

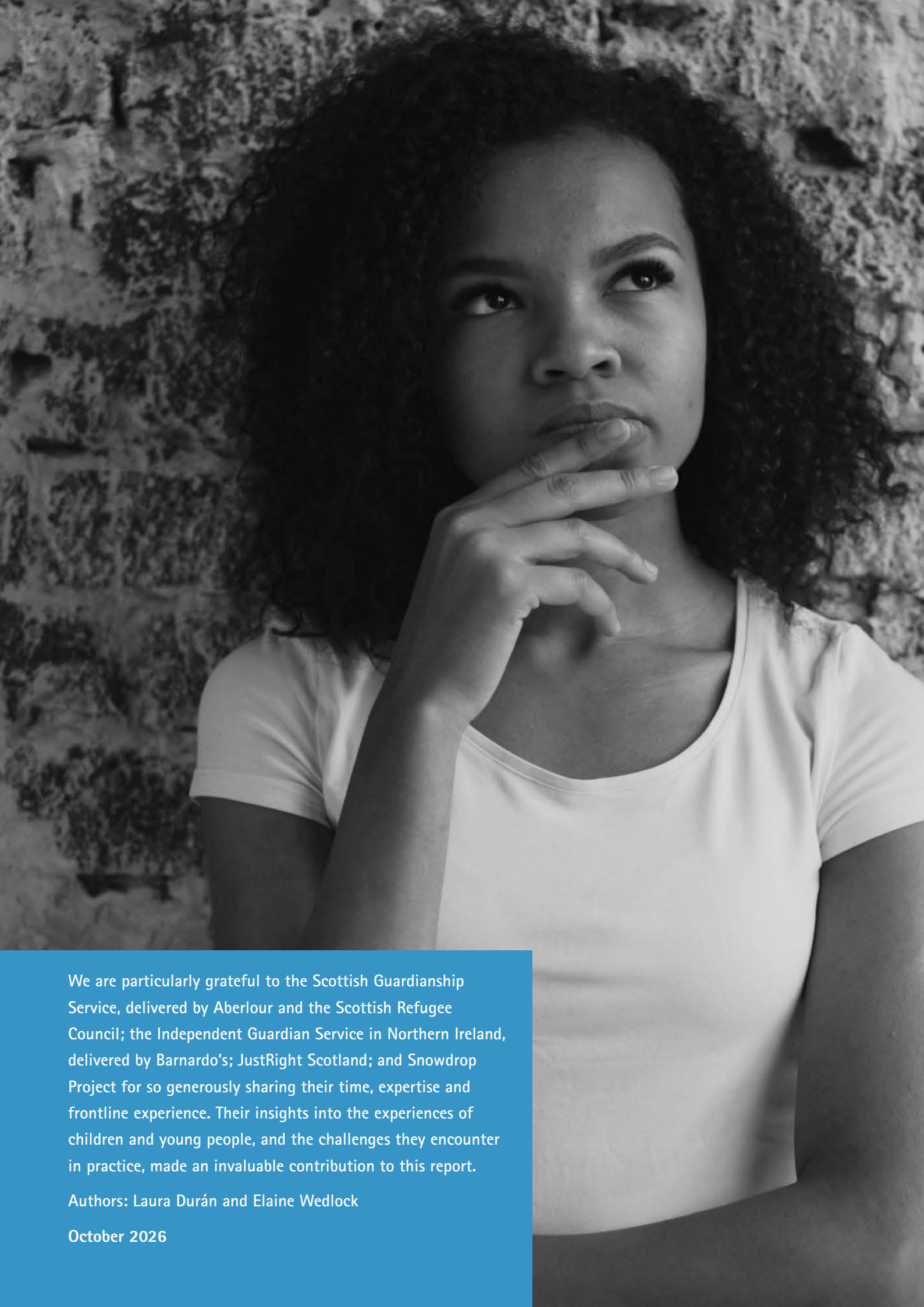


# Child Trafficking in the UK a Snapshot: 2026

Independent  
**Anti-Slavery**  
Commissioner



Every Child Protected  
Against Trafficking



We are particularly grateful to the Scottish Guardianship Service, delivered by Aberlour and the Scottish Refugee Council; the Independent Guardian Service in Northern Ireland, delivered by Barnardo's; JustRight Scotland; and Snowdrop Project for so generously sharing their time, expertise and frontline experience. Their insights into the experiences of children and young people, and the challenges they encounter in practice, made an invaluable contribution to this report.

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## FOREWORDS

We are seeing a shocking rise in children being exploited in communities across the UK who need our care and support to identify them and help their recovery. Our response must keep pace with the changing ways perpetrators reach, recruit, control and exploit children. Increasingly, this includes the use of the online world and emerging technologies, including AI, to reach children at greater scale and speed. Exploitation is becoming more complex, increasingly enabled by technology and, in some cases, harder to detect.

As Independent Anti-Slavery Commissioner, I have a UK-wide responsibility to encourage good practice in preventing and responding to modern slavery and human trafficking. An important part of that role is using evidence to understand where our systems are working, where children are being let down and where change is needed.

This report, produced jointly with ECPAT UK, brings together evidence on the UK's response to child trafficking at a time of significant legislative and policy change. There has been important progress in recent years. The recognition of child criminal exploitation in legislation, the national expansion of Independent Child Trafficking Guardians across England and Wales, and reforms to multi-agency safeguarding all create opportunities to strengthen the response. But legislation and policy must ultimately be judged by what they mean for children in practice.

Children who have experienced trafficking may disclose gradually, provide incomplete accounts or struggle to explain what has happened to them. The circumstances of their exploitation may also mean that offending forms part of their experience as a victim. Our systems must be capable of recognising these realities, rather than allowing them to become barriers to identification and protection.

This is particularly important as the Government introduces new legislation affecting how the credibility of victims' accounts is assessed. We must not create a system in which a child's credibility is undermined simply because time has passed, because they cannot recall or vocalise every detail, or because the circumstances of their exploitation resemble those experienced by other children.

These can be features of exploitation and trauma, not reasons to deny a child protection.

The evidence in this Snapshot reveals a deeply concerning picture. In the year ending March 2025, children's social care recorded more than 30,000 episodes involving trafficking, criminal or sexual exploitation in England. Yet during 2025, only 7000 were referred to the Government's support framework for identifying victims of exploitation and offering them additional care. There is a significant gap between the scale of exploitation being identified in children's social care records and the number of children being referred into the system designed to identify and support victims, while the true scale of exploitation may be greater still.

Despite the scale and seriousness of this abuse, too few perpetrators are being brought to justice. In 2025, there were just 34 completed prosecutions in England and Wales in cases flagged for both modern slavery or human trafficking and child abuse, with only 17 resulting in a conviction. Children are being failed at both ends of the system: in identifying and protecting victims, and in holding those who exploit them to account.

The findings also reinforce the need to anticipate emerging threats rather than continually responding once exploitation has taken hold. This is particularly important for children, whose relationships and experiences increasingly move between physical and digital environments. Our safeguarding response must keep pace with that changing reality.

Throughout all of this, one principle should remain constant, children who have been trafficked must be recognised as children first.

I hope this Snapshot provides an evidence base not only for scrutiny, but for action. As the nature of child exploitation changes, so too must our response. We need a system capable of recognising exploitation earlier, responding to the realities of children's experiences and ensuring that every child receives the protection they need.

**Eleanor Lyons,**  
Independent Anti-Slavery Commissioner

ECPAT UK has been documenting the UK's response to child trafficking through our Snapshot reports since 2010. Each edition provides an opportunity to take stock: to recognise where progress has been made, but also to ask the more difficult question of whether that progress has translated into greater safety and stronger protection for children who are trafficked and exploited.

Since our last Snapshot, there have been important developments. Child criminal exploitation (CCE) has been recognised in law through a new standalone offence, the Independent Child Trafficking Guardian service has expanded across England and Wales, and there has been renewed attention across the UK to improving child protection, multi-agency working and the prevention of exploitation.

These changes are welcome. But this report also shows how far we still have to go.

The number of children identified as potential victims remains extremely high, and the nature of exploitation continues to evolve. Children are being exploited in their communities and online, for criminal activity, sexual exploitation, labour and other forms of abuse. Too often, our systems respond after significant harm has already occurred rather than intervening early enough to prevent it.

There are also troubling inequalities in who receives protection. Our analysis of National Referral Mechanism (NRM) data raises serious questions about the very different identification outcomes experienced by children depending on their nationality. Children exploited through criminal activity can still be treated first as offenders rather than victims and can even be excluded from trafficking protections because of offending that may be connected to their exploitation. Foreign national children who have been formally

recognised as victims can reach adulthood without the secure immigration status they need to recover and build their futures. Thousands of children are known by local authorities to be victims of criminal and sexual exploitation but are not being referred into the NRM.

We still know far too little about what happens to those responsible for exploiting children. We have detailed data on thousands of children entering the trafficking identification system, but nowhere near the same visibility of whether their exploiters are investigated, prosecuted and convicted. Children should not carry the burden of a system that is better at counting victims than holding perpetrators to account.

The legislative and policy choices being made now will have consequences for children for years to come. There is an opportunity to build on the progress made and create a response that connects prevention, protection and prosecution. But there is also a real risk of moving backwards if immigration status, offending or difficulties in disclosing abuse become barriers to children being recognised and protected.

Children who are trafficked need more than recognition after the harm has happened. They need adults and systems that intervene earlier, believe and identify them fairly, provide safety and stability for as long as they need it, and pursue those responsible for their exploitation.

The recommendations in this Snapshot set out practical steps towards achieving that. The challenge now is to turn growing recognition of child exploitation into consistent protection for every child.

**Patricia Durr,**  
Chief Executive Officer, ECPAT UK



## EXECUTIVE SUMMARY



Child trafficking and exploitation remain significant and evolving forms of child abuse across the UK. The number of children referred to the National Referral Mechanism (NRM) – the system designed to identify and support victims of modern slavery and human trafficking – has continued to rise, while the nature of exploitation has become increasingly complex and overlapping. Criminal exploitation is now the most commonly recorded form of exploitation among children referred to the NRM, but children also experience sexual exploitation, labour exploitation, domestic servitude and combinations of different forms of harm. Exploitation increasingly crosses the boundaries between home, school, neighbourhoods, transport networks and online spaces.

The period since the last Snapshot has also seen substantial change in the legal and policy landscape. The Crime and Policing Act 2026 introduced a standalone offence of child criminal exploitation and new prevention orders, giving explicit legal recognition to the exploitation of children through criminal activity. The Children's Wellbeing and Schools Act 2026 has strengthened aspects of multi-agency safeguarding in England, while Scotland and Northern Ireland have continued to develop their own approaches to trafficking and child exploitation.

Other reforms create risks for trafficked children. Children continue to be caught within immigration enforcement and criminal justice processes, including age-disputed children prosecuted for offences connected to their arrival in the UK.

The Immigration and Asylum Bill proposes further changes to the modern slavery system, including new credibility provisions, changes to the public order disqualification, restrictions on trafficking-specific

immigration leave and the removal of the Secretary of State's duty to secure support for child victims. Of particular concern are the credibility provisions, which risk creating further barriers to identification by penalising children who delay disclosing exploitation, provide inconsistent accounts or omit important information because of trauma, fear or difficulties recognising and articulating their experiences. Requiring decision-makers to treat these factors as damaging to credibility fails to recognise the realities of how children disclose abuse and exploitation. The UK Government must remove these provisions from the Bill to ensure that trafficking identification reflects these realities. Taken together, the proposed reforms risk making children's access to trafficking protection increasingly dependent on their immigration status, offending history and ability to disclose exploitation within prescribed processes and timescales.<sup>1</sup>

Preventing exploitation before harm occurs remains one of the weakest parts of the response. There has been important progress through initiatives such as the Prevention Programme, the County Lines Programme, online safety reforms and the growing use of contextual safeguarding.<sup>2</sup> Schools, youth services, communities and businesses are increasingly recognised as part of the safeguarding response rather than exploitation being treated solely as a matter for social care and policing. However, prevention remains uneven and heavily dependent on local leadership, funding and specialist capacity. Resources continue to be concentrated on responding once children have already experienced significant harm, rather than on sustained early intervention. There remains no cross-government child exploitation strategy bringing together prevention across the different forms and contexts of exploitation.<sup>3</sup>

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<sup>1</sup> Home Office. (2026). [Immigration and Asylum Bill: Explanatory Notes](#); Home Office. (2026). [Modern Slavery: Statutory Guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and Non-Statutory Guidance for Scotland and Northern Ireland](#).

<sup>2</sup> The Children's Society. (2025). [Prevention Programme 2023–25: A Focused Evaluation Report](#); Home Office. (2026). [County Lines Programme](#); [Online Safety Act 2023](#); Firmin, C. et al. (2022). [Contextual Approaches to Schools: Developing Safeguarding Pathways and Practices for School Contexts](#).

<sup>3</sup> Justice and Care et al. (2026). [Decade of Dignity: A Strategic Vision for Eradicating Modern Slavery in the UK](#); The Children's Society. (2025). [Prevention Programme: Impact Report 2023–2025](#).

Weaknesses also remain once a child comes to the attention of authorities, with significant discrepancies between the number of children identified by local authorities as experiencing child sexual or criminal exploitation and those formally identified through the NRM. New analysis of NRM data undertaken for this Snapshot also identifies substantial differences in formal identification outcomes between groups of children. In 2025, almost half of Sudanese/South Sudanese and Iranian children referred to the NRM received a negative Reasonable Grounds decision, compared with 6% of UK children. Afghan and Eritrean children also experienced substantially higher negative decision rates. The differences persisted when age, gender, referring organisation and broad form of exploitation were taken into account. This suggests that the disparities cannot be attributed simply to differences in the characteristics of children being referred or the types of exploitation recorded. Although foreign national children may have experienced exploitation overseas, and there may be less evidence for decision-makers to rely on, this alone does not explain the differences in identification outcomes. The findings raise questions about whether children are being identified fairly and consistently, and whether nationality, immigration status or other factors may be influencing decisions.<sup>4</sup>

Identification through the NRM is also only one part of protection. Children require safe accommodation, education, specialist support, independent advocacy and stability beyond their eighteenth birthday. Reforms to children's social care and the national expansion of the Independent Child Trafficking Guardian service create opportunities to strengthen that response, but pressures on local services, shortages of appropriate placements and differences in access to specialist support remain significant.

For foreign national children, formal recognition as a victim does not provide security about their future as it should. Only a very small number of child victims confirmed through the NRM who require immigration leave have received trafficking-specific leave, and further proposed legislative changes in the Immigration and Asylum Bill would remove recovery from physical or psychological harm as an independent statutory basis for granting it. Insecure status undermines recovery and makes the transition to adulthood particularly precarious, when changes in accommodation, social care, immigration support and other entitlements can occur simultaneously.<sup>5</sup>

The NRM and wider child protection system can also fail children whose exploitation involves offending. Children continue to be criminalised for conduct arising from trafficking and exploitation, despite the statutory defence under section 45 of the Modern Slavery Act 2015 and the wider non-punishment principle.<sup>6</sup> The Snapshot's analysis shows that 17 children have been disqualified from NRM protection on public order grounds since this provision came into force.<sup>7</sup> Thirteen were flagged for county lines and 16 had already received a positive Reasonable Grounds decision. The same criminal exploitation that brings a child within the trafficking framework can therefore contribute to their exclusion from its protections.<sup>8</sup>

<sup>4</sup> Home Office, Modern Slavery Research & Analysis. (2026). National Referral Mechanism and Duty to Notify Statistics, 2014–2026. 21st Edition. UK Data Service. SN: 8910.

<sup>5</sup> Helen Bamber Foundation, ATLEU and ECPAT UK. (2025). Road to Nowhere: The impact of insecure immigration status on survivors of trafficking; Home Office. (2026). Temporary Permission to Stay: considerations for Victims of Human Trafficking or Slavery.

<sup>6</sup> Council of Europe Convention on Action against Trafficking in Human Beings (adopted 16 May 2005, entered into force 1 February 2008) CETS No 197, art 26.

<sup>7</sup> The Nationality and Borders Act 2022 (Commencement No. 4 and Transitional Provision) Regulations 2023 came into force on 30 January 2023.

<sup>8</sup> Home Office, Modern Slavery Research & Analysis. (2026). National Referral Mechanism and Duty to Notify Statistics, 2014–2026. 21st Edition. UK Data Service. SN: 8910.

Finally, the growing identification of children as victims has not been matched by comparable transparency about what happens to those responsible for exploiting them. Investigations and prosecutions remain affected by failures to identify exploitation early, inconsistent professional understanding, complex and lengthy investigations, limited specialist capacity and continued reliance on victim testimony with little support. Despite detailed statistics on children entering the NRM, child-specific data on trafficking and exploitation investigations, prosecutions and convictions are not routinely published. It is therefore difficult to determine whether increasing identification of children is translating into greater accountability for perpetrators.<sup>9</sup>

The overall picture is one of progress in recognising child trafficking and exploitation, but a continuing gap between recognition and protection. The next phase of reform needs to connect prevention, identification, protection and prosecution: intervening before exploitation becomes entrenched, identifying children fairly regardless of nationality or immigration status, ensuring that offending arising from exploitation does not become a barrier to protection, providing children with the stability required for long-term recovery, and placing greater responsibility on the systems tasked with identifying and pursuing those who exploit them.

## Key findings

1. **Prevention remains fragmented and inconsistent.** Despite significant developments in responses to child exploitation, prevention still depends heavily on local priorities, funding and specialist capacity. Children's access to early intervention, exploitation prevention and contextual safeguarding therefore varies considerably across the UK, with no overarching cross-government strategy bringing together the different forms and contexts of child exploitation.
2. **Foreign national children face substantially higher rates of refusal within the NRM.** In 2025, almost half of Sudanese/South Sudanese (47.5%) and Iranian (47.4%) children referred to the NRM received a negative Reasonable Grounds decision, compared with 6.3% of UK children. Afghan (37.0%) and Eritrean (28.1%) children also experienced substantially higher negative decision rates. Further analysis found that these disparities persisted when differences in children's age, gender, referring organisation and broad form of exploitation were taken into account. Cases of foreign national children exploited overseas may have less evidence available to decision makers, yet this did not fully explain the difference in refusal rates. The findings raise concerns about the consistency of NRM decision-making and warrant further investigation into whether nationality, immigration status or other factors influence children's identification as victims.
3. **Children are being excluded from trafficking protection on public order grounds, including children affected by criminal exploitation.** Nineteen children have been considered for public order disqualification and 17 were disqualified since the provisions came into force on 30 January 2023. Thirteen of those 17 were flagged for county lines and 16 had already received a positive Reasonable Grounds decision, meaning that the NRM had found reasonable grounds to believe they were victims of modern slavery before they were subsequently excluded from protection.

<sup>9</sup> House of Commons Home Affairs Committee. (2023). [Human Trafficking](#); Crown Prosecution Service. (2025). [Modern Slavery, Human Trafficking and Smuggling](#).

**4. Identification as a victim does not provide foreign national children with secure immigration status.**

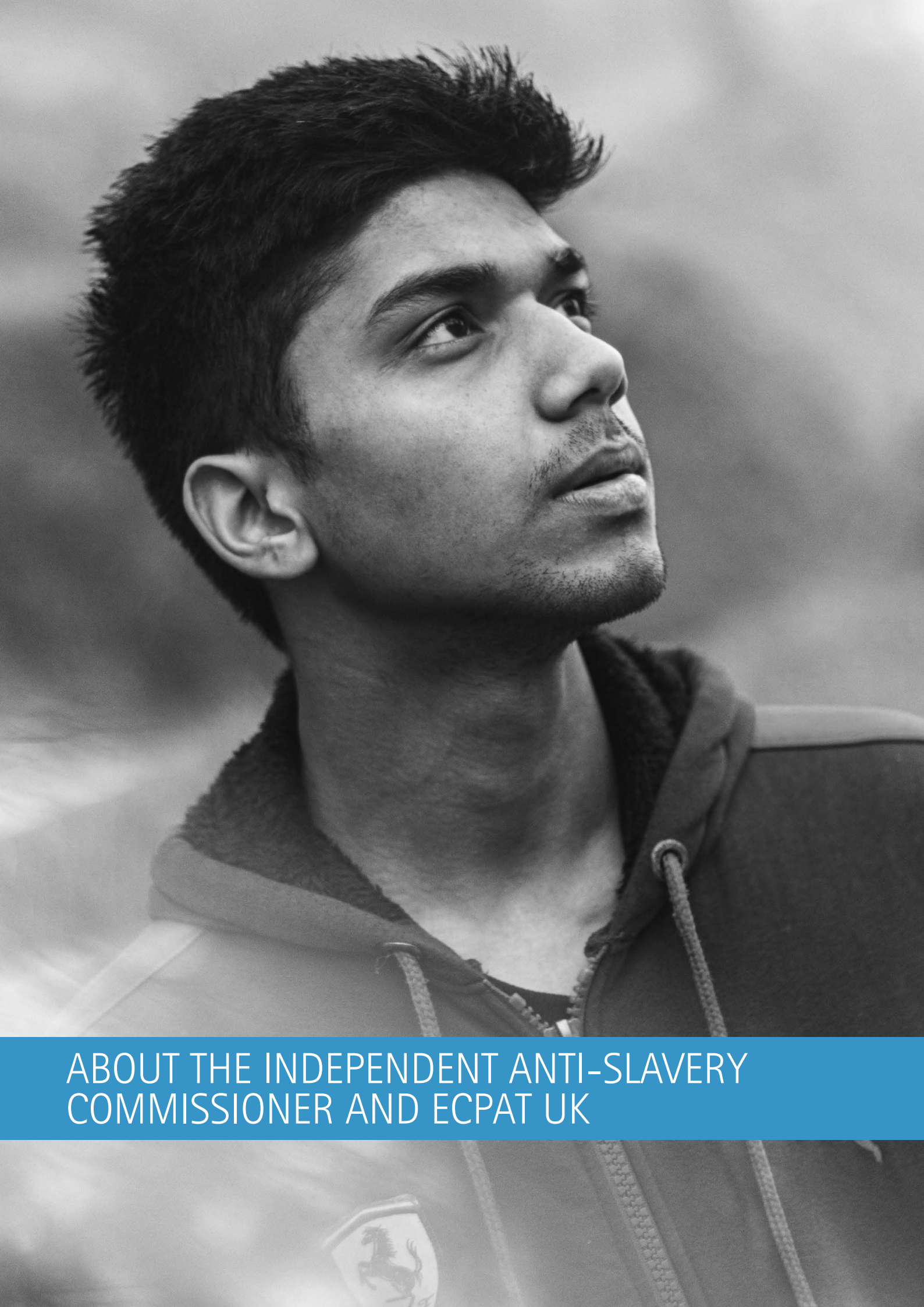
Only a very small proportion of confirmed child victims who require immigration leave receive trafficking-specific leave, leaving many without the longer-term security needed for recovery, education and transition to adulthood. Article 14(2) of European Convention of action Against Trafficking (ECAT) requires residence permits for child victims to be issued in accordance with their best interests. However, the UK's current framework does not provide a specific entitlement to immigration leave based on a trafficked child's best interests. The Immigration and Asylum Bill would further restrict access by removing recovery from physical or psychological harm as a statutory basis for granting Victims of Trafficking or Slavery (VTS) leave, without introducing a child-specific best-interests route to residence.

**5. The identification of increasing numbers of child victims has not been matched by transparent evidence of perpetrators being brought to justice.**

More than 7,000 children were referred to the NRM in 2025, yet there remains no routinely published child-specific data showing how many trafficking and exploitation investigations result in prosecution or conviction. Existing evidence identifies persistent barriers including failures to identify exploitation early, inconsistent professional understanding, complex and lengthy investigations, reliance on victim testimony and limited specialist support capacity.

### Priority recommendations

1. The UK Government must develop a cross-government child exploitation strategy with prevention at its core, establishing a national framework for preventing all forms of child exploitation, strengthening coordination across government, education and early intervention, embedding contextual safeguarding, addressing exploitation in online environments, and setting clear outcomes against which prevention activity can be evaluated.
2. The Home Office must urgently investigate and address the substantial disparities in NRM identification outcomes between UK and foreign national children, including whether nationality, immigration status, experiences of exploitation overseas or other factors are resulting in discriminatory barriers to identification.
3. The UK Government must ensure that no child is disbelieved as a result of credibility grounds or disqualified from trafficking identification or protection on public order grounds, including where offending may be connected to their exploitation, and that access to protection is not determined by a child's nationality or immigration status.
4. The Home Office must introduce a specific route to secure immigration status for confirmed child victims of trafficking where remaining in the UK is in their best interests, granting a minimum of five years' leave with a route to settlement.
5. The UK Government must develop a cross-criminal justice strategy to improve the investigation, prosecution and conviction of child trafficking and exploitation offences and address the significant disparity between the number of children identified as victims and perpetrators brought to justice.



ABOUT THE INDEPENDENT ANTI-SLAVERY  
COMMISSIONER AND ECPAT UK

### About the Independent Anti-Slavery Commissioner

The Independent Anti-Slavery Commissioner (IASC) is a statutory role established by the Modern Slavery Act 2015 to encourage good practice in the prevention, detection, investigation and prosecution of modern slavery offences, and in the identification and support of victims. The Commissioner has a UK-wide remit and works with government, law enforcement, local authorities, businesses, civil society and other partners to strengthen the response to modern slavery and human trafficking. The Commissioner also supports research to improve understanding of modern slavery and how it can be more effectively addressed.

The IASC is independent of government and provides evidence, advice and recommendations to improve policy and practice. Its current Strategic Plan focuses on three overarching priorities: preventing modern slavery and victimisation; improving the identification, care and support of victims; and strengthening the investigation and prosecution of those responsible for exploitation. Across these priorities, the IASC seeks to improve knowledge and understanding, strengthen collaboration and ensure that the voices and experiences of survivors inform the UK's response to modern slavery.

### 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. Our vision is 'Children everywhere enjoy their rights to be protected and to lives free from trafficking and exploitation'. We promote and uphold children's rights to protection, prevention, and participation.

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 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 exploitation as outlined in national legislation and the international legal framework.



## CHAPTER 1: CHILD TRAFFICKING IN THE UK

## Definitions

Child trafficking is defined in the United Nations (UN) Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (the Palermo Protocol) as the recruitment, transportation, transfer, harbouring or receipt of a child under the age of 18 for the purpose of exploitation.<sup>10</sup> Unlike the definition of trafficking for adults, there is no requirement to demonstrate the use of force, coercion, deception or other "means" where the victim is a child. International law recognises that children cannot consent to their own exploitation.<sup>11</sup>

Child trafficking is a form of child abuse and a serious violation of children's rights. It can involve movement across international borders, within the UK, or over very short distances. Transportation is only one element of the trafficking process and, in some cases, may not occur at all. A child may instead be recruited, harboured or received for the purpose of exploitation. Children may be exploited through criminal exploitation, sexual exploitation, labour exploitation, domestic servitude, begging, organ removal, child marriage and other practices similar to slavery.

Research undertaken by ECPAT UK through the *More than Words* research project found strong consensus among professionals that the UK requires a clearer, overarching statutory definition of child exploitation to ensure consistent identification and responses across safeguarding, criminal justice and immigration systems.<sup>12</sup> Current legislative and policy frameworks often treat different forms of exploitation separately, creating siloed approaches and inconsistent practice.

A persistent problem is the misunderstanding that movement is the defining feature of child trafficking. In England, Wales and Northern Ireland, the narrower interpretation of trafficking has contributed to inconsistent identification of child victims, with professionals often placing disproportionate emphasis on whether a child has been transported rather than whether they have been recruited or harboured.<sup>13</sup> This risks excluding children whose exploitation does not involve movement from being recognised as victims and limits their access to specialist protection and support.

Similarly, existing government definitions of child criminal exploitation (CCE) and child sexual exploitation (CSE) continue to require evidence of coercion, deception or manipulation. While these factors are commonly present in children's experiences, requiring them as part of the definition creates a higher threshold than is required under international law.<sup>14</sup> This is inconsistent with the Palermo Protocol and the European Convention on Action against Trafficking in Persons (ECAT) in Human Beings, both of which recognise that children cannot legally consent to the exploitation and therefore do not require proof of "means" in child trafficking cases.

There are further opportunities to strengthen the definition of CSE and CCE. The Independent Inquiry into Child Sexual Abuse recommended that the Department for Education review and update its guidance on child sexual exploitation, and the Government has since committed to revising this guidance to ensure it reflects the latest evidence and practice within its consultation on wider safeguarding reforms.<sup>15</sup> Additionally, the commencement of the new CCE offence under the Crime and Policing Act

<sup>10</sup> Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime.

<sup>11</sup> Article 3 (c)

<sup>12</sup> Durán, L. et al. (2025). *More than Words: How definitions impact on the UK's response to child trafficking and exploitation*.

<sup>13</sup> Ibid.

<sup>14</sup> Ibid.

<sup>15</sup> Independent Inquiry into Child Sexual Abuse. (2022). *Child sexual exploitation by organised networks investigation report*; Home Office. (2025). *Tackling child sexual abuse: progress update*.

2026 will be accompanied by both statutory guidance for law enforcement and non-statutory guidance for frontline practitioners. These developments present a significant opportunity to establish definitions of child exploitation that are consistent across legislation, safeguarding and criminal justice frameworks, align with the UK's international obligations, and support the earlier and more consistent identification of children who have experienced exploitation.

*More than Words* also found that children's experiences are frequently interpreted through assumptions about who is perceived to be a "typical" victim.<sup>16</sup> Participants described how factors such as a child's age, gender, nationality or ethnicity can influence whether professionals recognise their cases as child trafficking, contributing to disparities in identification and access to protection. A child-centred understanding of exploitation must therefore move beyond narrow interpretations and stereotypes to recognise the full range of children's lived experiences and their rights to protection.

In 2025, the Government consulted on reforms to the identification of victims of modern slavery, including the operation of the National Referral Mechanism (NRM) and the definitions used to identify victims.<sup>17</sup> ECPAT UK welcomed the opportunity to contribute, including proposals to strengthen and clarify the definition of child exploitation. While the Government has indicated that responses informed the legislative proposals contained in the Immigration and Asylum Bill and that wider non-legislative reforms to the NRM will follow, there remains little clarity about how the findings of the consultation, particularly those relating to child definitions, will be taken forward.

This includes significant concerns about proposals in the consultation about simplifying the identification process for UK children, given the important role that formal trafficking identification plays in recognising children's rights and ensuring consistent access to specialist protection and support.

### Latest data and trends

In 2025, there were 23,407 referrals to the NRM, the UK's framework for identifying and supporting potential victims of modern slavery, of which 7,045 (30%) related to people who were children at the time of referral.<sup>18</sup> The figures in this Snapshot use age at referral throughout unless otherwise stated. Children referred to the NRM were predominantly older teenagers. Of the 7,045 children referred in 2025, 5,888 (84%) were aged 15 to 17 at the point of referral, while 1,157 (16%) were aged 14 or younger.<sup>19</sup> The concentration of referrals among older children may reflect patterns of exploitation affecting older children specifically or those that become more visible to professionals during adolescence, but it also highlights the need to ensure that younger children experiencing exploitation are identified at an early stage, rather than only once harm has escalated or become more readily recognised by services.

As in previous years, the majority of children referred to the NRM were boys. Of the 7,045 children referred in 2025, 5,655 (80%) were male and 1,390 (20%) were female.<sup>20</sup> This gender profile continues to reflect the high proportion of children identified as experiencing criminal exploitation, although it is important to recognise that girls remain significantly under-identified across several forms of exploitation, particularly child criminal exploitation.<sup>21</sup>

<sup>16</sup> Durán, L. et al. (2025). *More than Words: How definitions impact on the UK's response to child trafficking and exploitation*.

<sup>17</sup> Home Office. (2026). *Call for evidence outcome: Identification of victims of modern slavery*.

<sup>18</sup> Home Office, Modern Slavery Research & Analysis. (2026). *National Referral Mechanism and Duty to Notify Statistics, 2014–2026*. 21st Edition. UK Data Service. SN: 8910.

<sup>19</sup> Ibid.

<sup>20</sup> Ibid.

<sup>21</sup> BBC News. (2026). *Drug gangs exploited and raped us as teens, then police failed us, women tell BBC*.

While the NRM provides the UK's official data on children identified as potential victims of modern slavery, data collected through the Department for Education's Children in Need census in England presents a different picture of the scale of exploitation identified by children's social care. The Children in Need data records factors identified at the end of an assessment that social workers consider relevant to a child's circumstances, rather than formal trafficking decisions.<sup>22</sup> Each factor is counted once per episode of need, although an individual child may have more than one episode during the reporting year and therefore may be counted more than once for the same factor.

In the year ending 31 March 2025, children's social care recorded trafficking as a factor in 2,250 episodes, CCE in 16,250 episodes and CSE in 12,400 episodes.<sup>23</sup> The separate categorisation of trafficking, CCE and CSE is itself problematic, as it reinforces an artificial distinction between trafficking and other forms of child exploitation. Under international law, children who are recruited, harboured or transported for the purpose of exploitation are child victims of trafficking, regardless of whether coercion or deception is involved. Recording these forms of exploitation separately, without adequately recognising where they overlap, risks obscuring the extent of child trafficking identified within children's social care.

Although these datasets are not directly comparable, they highlight the significant number of children recognised by children's social care as experiencing exploitation compared with those who are formally referred into the NRM. This disparity reinforces

longstanding concerns that many exploited children are identified within safeguarding systems but are not consistently recognised or referred as potential victims of trafficking and modern slavery.

UK nationals continued to make up the majority of children referred. 4,333 children (61.5%) were UK nationals, including children recorded as holding UK and another nationality.<sup>24</sup> However, more than a third of children referred were foreign nationals: 2,697 (38.3%) had neither UK nor Irish nationality.<sup>25</sup> Of these foreign national children, 336 were EU nationals, equivalent to 12.5% of foreign national children and 4.8% of all child referrals.<sup>26</sup> Nationals of countries outside the UK, Ireland and European Union (EU) accounted for 2,361 children, or one-third (33.5%) of all children referred to the NRM.<sup>27</sup> The largest nationality groups among foreign national children included Sudanese/South Sudanese (453), Eritrean (367), Vietnamese (334), Somali (306), Afghan (135), Iranian (114), Romanian (112) and Ethiopian (106). There were also 76 Albanian children.<sup>28</sup>

The profile of organisations identifying and referring children also differed markedly from the NRM population as a whole. Local authorities made 4,175 child referrals (59%), followed by police with 1,653 (23%) and government agencies with 1,164 (17%).<sup>29</sup> Only 53 referrals (less than 1%) were made by NGOs and third-sector First Responders. Within government agencies, 579 referrals were made by UK Visas and Immigration, 540 by UK Border Force, 41 by Immigration Enforcement and four by the National Crime Agency.<sup>30</sup> The prominence of local authorities reflects their central safeguarding responsibilities and their role as First Responders for children.

<sup>22</sup> Department for Education. (2025). Children in need: 2024 to 2025.

<sup>23</sup> Department for Education. (2025). Children in need: 2024 to 2025. Factors identified at the end of assessment.

<sup>24</sup> Home Office, Modern Slavery Research & Analysis. (2026). National Referral Mechanism and Duty to Notify Statistics, 2014–2026. 21st Edition. UK Data Service. SN: 8910.

<sup>25</sup> For this analysis, children with more than one nationality were assigned to a single nationality group to reflect the different immigration implications for children in the UK. All children with UK nationality, including dual UK nationals, were counted as UK nationals. Children with Irish nationality who did not also hold UK nationality were counted as Irish nationals, reflecting

the rights of Irish citizens in the UK under the Common Travel Area as different from other EU national children. Other nationality groups therefore exclude children who also held UK or Irish nationality. This allows the analysis to distinguish children whose nationality may give rise to immigration status and protection issues from those with UK or Irish citizenship.

<sup>26</sup> Home Office, Modern Slavery Research & Analysis. (2026). National Referral Mechanism and Duty to Notify Statistics, 2014–2026. 21st Edition. UK Data Service. SN: 8910.

<sup>27</sup> Ibid.

<sup>28</sup> Ibid.

<sup>29</sup> Ibid.

<sup>30</sup> Ibid.

While NRM statistics provide the clearest national picture of child trafficking in the UK, they represent only those children who have been identified and referred. Many child victims remain unidentified or are recognised only as victims of other forms of abuse. As highlighted in *More than Words*, inconsistencies in professional understanding of exploitation and trafficking continue to influence identification and referral practices, meaning the true scale of child trafficking in the UK is significantly higher than official NRM statistics suggest.<sup>31</sup>

## Forms of exploitation

Children experience a wide range of forms of exploitation, and research consistently shows that these experiences frequently overlap and evolve over time. While legal and policy frameworks often distinguish between forms of exploitation such as child criminal exploitation, child sexual exploitation and labour exploitation, children's lived experiences rarely fit neatly within these categories. Increasingly, researchers and practitioners advocate understanding child exploitation as a continuum of abuse, recognising that the same child may experience multiple forms of exploitation simultaneously or at different points over the course of their exploitation, while remaining sensitive to the distinct dynamics and harms associated with different forms of exploitation.<sup>32</sup>

Child criminal exploitation is a form of child abuse involving the use, procuring or offering of a child for any criminal activity. This can include the cultivation, supply or transportation of drugs, theft, fraud,

financial crime, acquisitive crime and other offending. While exploitation for drug supply and distribution remains one of the most visible manifestations of CCE, evidence demonstrates that children are exploited for a much wider range of criminal activity, including within family networks and increasingly through online environments. There may never be any direct contact with those exploiting the child. The 2025 NRM data illustrates both the prevalence of different forms of exploitation and the extent of overlap between them. Criminal exploitation alone was recorded for 3,482 children, almost half (49%) of all child referrals.<sup>33</sup> A further 599 children were recorded as experiencing criminal exploitation alongside at least one other form of exploitation, including 319 children recorded as experiencing both labour and criminal exploitation and 230 experiencing both sexual and criminal exploitation.<sup>34</sup> The prominence of criminal exploitation in NRM referrals reinforces the importance of recognising children who come to the attention of police and other agencies because of offending behaviour as potential victims of exploitation.

Child sexual exploitation is a form of child sexual abuse in which a child is exploited through sexual activity for the benefit of another person or group. It encompasses both contact and non-contact abuse, including online exploitation, the production of child sexual abuse material, live-streamed abuse and exploitation facilitated through social media and digital technologies. In 2025, 631 children were referred to the NRM for sexual exploitation alone, while at least 361 further referrals recorded sexual exploitation in combination with one or more other

<sup>31</sup> Durán, L. et al. (2025). *More than Words: How definitions impact on the UK's response to child trafficking and exploitation*.

<sup>32</sup> Brodie, I. (2021). *Child exploitation: definitions and language*; Dunhill, A., Gordon, F., Kidd, A., Kirk, T. and Lundy, L. (2020). *Responses to child victims of modern slavery in the United Kingdom: a children's rights perspective*; Harvey, J. H., Hornsby, R. A. and Sattar, Z. (2015). *Disjointed Service: An English Case Study of Multi-agency Provision in Tackling Child Trafficking*; Cockbain, E. and Olver, K. (2019). *Child Trafficking: Characteristics, Complexities, and Challenges*

<sup>33</sup> Home Office, Modern Slavery Research & Analysis. (2026). *National Referral Mechanism and Duty to Notify Statistics, 2014–2026*. 21st Edition. UK Data Service. SN: 8910.

<sup>34</sup> Ibid.

forms of exploitation.<sup>35</sup> Research has highlighted the increasingly blurred boundaries between online and offline exploitation, with digital technologies enabling exploitation to move across online and physical environments and creating new challenges for safeguarding responses.<sup>36</sup>

Children are also exploited for labour across a range of settings and sectors, including agriculture, construction, hospitality, manufacturing, hand car washes and nail bars. Labour exploitation alone accounted for 1,066 child referrals in 2025, with a further 565 children recorded as experiencing labour exploitation alongside another form of exploitation.<sup>37</sup> Domestic servitude, in which children may be exploited within private households through excessive domestic work, isolation and other abusive practices, was recorded as the sole exploitation type for 68 children, with further children experiencing domestic servitude alongside other forms of exploitation.<sup>38</sup> Organ harvesting was recorded in four child referrals, three of which involved other forms of exploitation.<sup>39</sup> Although not identified in the NRM data as standalone exploitation categories, children may also be exploited through begging, child marriage and financial exploitation. These forms of exploitation remain comparatively under-identified and under-researched.

A significant proportion of referrals could not be placed within any of the specified exploitation categories. For 974 children, representing 14% of all child referrals in 2025, the form of exploitation was recorded as 'not specified or unknown'.<sup>40</sup> Disclosure in child trafficking cases is often gradual and the nature or full extent of a child's exploitation may not be known when safeguarding concerns first arise.

The data also demonstrates the limitations of treating forms of exploitation as discrete categories. More than 800 children were recorded as experiencing two or more forms of exploitation in 2025.<sup>41</sup> These combinations included criminal and labour exploitation, sexual and criminal exploitation, labour and domestic servitude, and cases involving three or more recorded forms. The categories describe what was known and recorded about a child's exploitation rather than necessarily capturing the entirety of their experience.

Research, policy and practice increasingly recognise that responses should seek to understand children's experiences of exploitation as a whole rather than attempting to fit them within rigid categories. This approach supports earlier identification, more effective safeguarding and a more child-centred response, while recognising that different forms of exploitation may require distinct knowledge and responses. It also aligns with calls for an overarching child exploitation strategy that is consistent across safeguarding, criminal justice and modern slavery frameworks.

<sup>35</sup> Ibid.

<sup>36</sup> Chiu, J. and Quayle, E. (2022). Understanding online grooming: An interpretative phenomenological analysis of adolescents' offline meetings with adult perpetrators. *Child Abuse & Neglect*, 128, 105600.

<sup>37</sup> Home Office, Modern Slavery Research & Analysis. (2026). National Referral Mechanism and Duty to Notify Statistics, 2014-2026. 21st Edition. UK Data Service. SN: 8910.

<sup>38</sup> Ibid.

<sup>39</sup> Ibid.

<sup>40</sup> Ibid.

<sup>41</sup> Ibid.



## CHAPTER 2: KEY DEVELOPMENTS

The period since the last Snapshot has seen significant developments in the legal and policy framework affecting child victims of trafficking. New legislation has strengthened elements of the child protection response and introduced specific recognition of child criminal exploitation, while changes to immigration and modern slavery law and policy have created new risks for children. At the same time, developments in case law have continued to clarify the obligations of public authorities towards child victims.

## Legislation

### Crime and Policing Act 2026

The Crime and Policing Act 2026 introduced a package of measures relevant to the prevention and prosecution of child exploitation. Most significantly, it established CCE as a standalone criminal offence for the first time. The offence applies where an adult engages in conduct towards or in respect of a child, with the intention of causing them to commit a criminal offence and carries a maximum sentence of ten years' imprisonment. The Act also introduced CCE prevention orders, which allow courts to impose requirements and restrictions on adults who pose a risk of criminally exploiting children, including following an acquittal or on application without a criminal conviction.

The creation of a specific CCE offence is an important recognition that using children to commit crime is itself a form of exploitation and harm. Previously, perpetrators could be prosecuted through offences including modern slavery and human trafficking offences and encouraging or assisting crime, but there was no specific offence recognising CCE. The new framework also expressly recognises the power imbalance between adults and children and does not require proof that a child was compelled, coerced or deceived into the criminal activity. The offence is limited to perpetrators aged 18 and over and therefore does not apply where a child exploits or recruits another child, in recognition of the need to ensure that children are not further criminalised.

The Act also created standalone offences of internal concealment, addressing the practice of causing people to conceal drugs or other specified items inside their bodies for a criminal purpose. Where the victim is a child, it is an offence intentionally to cause them to internally conceal a specified item connected with criminal conduct. Unlike the corresponding offence involving an adult victim, there is no requirement to demonstrate compulsion, coercion, deception, manipulation or controlling behaviour. Apparent consent by the child is irrelevant. This is particularly significant in the context of criminal exploitation, where children may be concealing drugs internally, exposing them to serious physical and psychological harm.

A new offence of 'cuckooing' or home takeover was also introduced, criminalising the control of another person's home without their consent for specified criminal purposes. The legislation expressly provides that a person under 18 cannot consent to control of their home for these purposes. Cuckooing is frequently associated with county lines and criminal exploitation and can involve the exploitation both of vulnerable occupants whose homes are taken over and of children subsequently used to conduct criminal activity from those properties.

The Act also introduced a statutory aggravating factor requiring courts sentencing specified child sexual offences to treat grooming as increasing the seriousness of the offending where the offence was facilitated by or involved the grooming of a person under 18. The grooming does not itself have to be sexual and may have been undertaken by the offender or by another person. The measure therefore encompasses forms of networked exploitation where one individual grooms a child who is subsequently sexually abused by another, as well as circumstances where a child is groomed to recruit other children for exploitation. The reform implements a recommendation of the Independent Inquiry into Child Sexual Abuse following its investigation into CSE by organised networks.<sup>42</sup>

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<sup>42</sup> Independent Inquiry into Child Sexual Abuse. (2022). [Child sexual exploitation by organised networks investigation report](#)

Other measures implementing recommendations of the Independent Inquiry into Child Sexual Abuse include a new mandatory reporting duty for individuals undertaking specified roles involving children in England, an offence of obstructing a person from making a report under that duty, changes to Disclosure and Barring Service arrangements, and the removal of the three-year limitation period for personal injury claims brought by survivors in relation to child sexual abuse.<sup>43</sup>

### **Children's Wellbeing and Schools Act 2026**

The Children's Wellbeing and Schools Act 2026 introduced significant reforms to children's social care, child protection and multi-agency safeguarding in England. The Act strengthens the role of education and childcare in local safeguarding arrangements, requires safeguarding partners to establish Multi-Agency Child Protection Teams (MACPTs) and introduces new provisions intended to improve information sharing between agencies. It also includes reforms affecting children in care, care leavers and children in kinship care.

These reforms have relevance to child exploitation. Exploited children may be known to several services while the full picture of harm remains unidentified, and exploitation frequently crosses organisational and geographical boundaries. Stronger multi-agency arrangements and information sharing therefore have the potential to improve identification and protection. The MACPTs established under the Act are intended to support local authorities in discharging their section 47 Children Act 1989 child protection duties through joint working between social care, police, health and other relevant agencies.<sup>44</sup>

However, the extension of corporate parenting responsibilities to care leavers contains a significant exclusion for children subject to immigration control. Section 24 provides that the new corporate parenting duty does not apply to any function of the Secretary of State relating to immigration, asylum or nationality, or to the Secretary of State's general customs functions. The exclusion applies to the functions rather than to individual children, meaning that looked-after children and care leavers with insecure immigration status remain within the scope of corporate parenting duties when relevant authorities exercise other functions.<sup>45</sup> Nevertheless, the Home Office is not required to exercise its immigration, asylum and nationality functions in accordance with these new corporate parenting responsibilities. This is a significant missed opportunity to ensure that the wellbeing of looked-after children and care leavers is considered consistently across government decision-making, particularly given the profound impact that immigration status and nationality can have on children's safety, stability and long-term outcomes.

### **Border Security, Asylum and Immigration Act 2025**

The Border Security, Asylum and Immigration Act 2025 introduced new criminal offences and enforcement powers intended to address organised immigration crime and irregular migration. Section 21 created a new offence where a person travelling by sea from France, Belgium or the Netherlands to the UK acts in a way that causes or creates a risk of serious personal injury or death to another person during the journey.

The legislation was introduced against an existing pattern of criminalisation of people arriving irregularly in the UK. The Nationality and Borders Act 2022 had expanded the offence of illegal arrival and, by January 2026, 1,099 people had been convicted. Those prosecuted included people seeking asylum and victims of trafficking and torture, as well as children who had been wrongly treated as adults.<sup>46</sup>

<sup>43</sup> Home Office and Ministry of Justice. (2026). Crime and Policing Act 2026: overarching factsheet; Independent Inquiry into Child Sexual Abuse. (2022). Recommendations.

<sup>44</sup> UK Parliament. (2026). Children's Wellbeing and Schools Act 2026: Explanatory Notes.

<sup>45</sup> Department for Education. (2025). Written question HL9425: Children in Care and Care Leavers: Immigration. Answered 4 August 2025.

<sup>46</sup> Taylor, V. (2026). Over 1,000 people seeking sanctuary convicted of illegal arrival in the UK.

Research published by Humans for Rights Network, Captain Support UK and Refugee Legal Support in May 2025 documented the impact on age-disputed children. The organisations had identified 29 children with age disputes who had been arrested and charged since June 2022. Seventeen had subsequently had their ages accepted as under 18 by local authorities and at least 18 had spent time in adult prisons, sharing cells with adults. The research found that children continued to be arrested and charged with illegal arrival, and sometimes facilitation, after being identified as having their 'hand on the tiller' of a small boat. It also identified failures to recognise potential trafficking: potential victims were being convicted and imprisoned without referral to the NRM or consideration of the relationship between possible exploitation and the alleged offence.<sup>47</sup>

Individual cases demonstrate the consequences of prosecuting before disputes about age are properly resolved. In one case reported in January 2025, an Eritrean child who maintained that he was 16 was treated as an adult and charged with an immigration offence before a Merton-compliant assessment of his age had taken place, despite Home Office and Crown Prosecution Service (CPS) policy not to charge children with the offence. A subsequent National Age Assessment Board (NAAB) assessment also concluded that he was an adult.<sup>48</sup> The Youth Court ultimately determined that he had been 16 when he arrived and found his account of his age credible, while placing only minimal weight on the NAAB assessment. The Home Office subsequently accepted that he was a child and the CPS withdrew the charge. He had nevertheless been subject to criminal proceedings for more than seven months.<sup>49</sup>

These risks were therefore well documented when Parliament considered the Border Security, Asylum and Immigration Act 2025. Children's rights organisations warned that expanding immigration offences risked further criminalising children, including children who may have been trafficked or exploited. Evidence submitted during parliamentary scrutiny highlighted the particular risk that children could be exploited by adults to undertake conduct captured by the proposed offences, including steering small boats. The Joint Committee on Human Rights also raised concerns about the interaction between the new offences and the existing risk of children being wrongly identified as adults.<sup>50</sup>

Despite these concerns, the Act did not provide a general exemption for children from the new offences or require outstanding age disputes to be resolved before prosecution. The Government instead relied on existing criminal justice safeguards. Its Equality Impact Assessment acknowledged that children may be particularly vulnerable to coercion by organised crime groups and that this could place them at greater risk under the new offences. It maintained that the risk of inappropriate prosecution would be mitigated through prosecutorial practice, consideration of age and the circumstances in which an offence was committed, and the availability of protections including the section 45 Modern Slavery Act 2015 statutory defence.<sup>51</sup>

Early implementation has demonstrated the limitations of those safeguards. In March 2026, it was reported that a child had been charged with the new endangerment offence after allegedly piloting a small boat during a Channel crossing. The child had arrived in the UK earlier that year and was in local authority care. Despite being assessed as under 18, the CPS maintained

<sup>47</sup> Humans for Rights Network, Captain Support UK and Refugee Legal Support. (2025). [I Told Them the Truth: The criminalisation of people arriving to the UK on 'small boats'](#).

<sup>48</sup> Harrison, S., Mellon, G. and O'Mara, N. (2025). [Home Office concedes age dispute challenge and accepts child refugee wrongly assessed as adult in Criminal Court](#).

<sup>49</sup> Ibid.

<sup>50</sup> Joint Committee on Human Rights. (2025). [Legislative Scrutiny: Border Security, Asylum and Immigration Bill](#), Fourth Report of Session 2024–25, HL Paper 143, HC 789; Refugee and Migrant Children's Consortium. (2025). [Written evidence submitted to the Public Bill Committee: Border Security, Asylum and Immigration Bill](#).

<sup>51</sup> Home Office. (2025). [Border Security, Asylum and Immigration Act 2025: Equality Impact Assessment](#).

that prosecution was in the public interest because of the seriousness of the alleged offence. At Canterbury Crown Court, the judge questioned the decision to prosecute a child and stated that the CPS would need to demonstrate that it had followed the necessary protocols and taken account of relevant conventions concerning the criminalisation of children. The case was remitted to the Youth Court.<sup>52</sup> By July 2026, it was reported that the child had been found by the NAAB to be 16 but that the CPS was continuing the prosecution.<sup>53</sup>

The experience since 2022 demonstrates two related risks for children. First, children whose age is disputed can be arrested, charged and, in some cases, imprisoned with adults before their age has been properly determined. Secondly, under the new endangerment offence, confirmation that a person is a child does not itself prevent prosecution. The safeguards relied upon by the Government during the passage of the legislation have therefore not prevented children from entering or remaining within criminal proceedings.

Research on prosecutions for small boat offences has found that some people identified as steering boats do so because they cannot otherwise afford the crossing or are forced to steer, and that potential trafficking victims have been prosecuted without their possible exploitation being considered through the NRM.<sup>54</sup> Children may similarly be required, pressured or exploited by adults to undertake activities during their journeys. A child's apparent participation in conduct constituting an immigration offence should therefore prompt consideration of whether the conduct occurred in the context of trafficking or exploitation and of the safeguards intended to prevent the criminalisation of trafficked and exploited children.

### Immigration and Asylum Bill

The Immigration and Asylum Bill, introduced in June 2026, proposes significant changes to the immigration, asylum and modern slavery systems. Several provisions would directly affect the identification and protection of child victims of trafficking.

The provisions on *Identification of victims of slavery and human trafficking* would provide a statutory basis for public authorities nominated by the Secretary of State to make Reasonable Grounds and Conclusive Grounds decisions for children. Where a child turns 18 before a decision is made, the Secretary of State would remain the competent authority. This builds on the ongoing programme of devolved NRM decision-making for children, [considered later in this chapter](#).

The provisions on *Credibility of persons claiming to be victims* raise serious concerns for the identification of children. They would require NRM decision-makers to treat delays in disclosing trafficking, material inaccuracies, inconsistencies or omissions, inconsistencies with information provided in other proceedings, and certain similarities with another person's account as damaging to credibility unless there are 'good reasons'. There is no exemption or separate test for children. The Independent Anti-Slavery Commissioner has raised significant concerns about these provisions and has called for the credibility clause to be removed from the Bill.

These are precisely the features that can characterise a child's disclosure of abuse and exploitation. Children may disclose incrementally, retract or change accounts, omit information or initially deny exploitation because of trauma, fear, threats, grooming, loyalty to exploiters, distrust of authorities or because they do not understand that what has happened to them constitutes exploitation. The Home Office's own *Modern*

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<sup>52</sup> Bancroft, H. (2026). [Boy charged with endangering lives of migrants in Channel crossing under controversial new law](#).

<sup>53</sup> Taylor, V. (2026). [Over 1,000 people seeking sanctuary convicted of illegal arrival in the UK](#).

<sup>54</sup> Humans for Rights Network, Captain Support UK and Refugee Legal Support. (2025). [I Told Them the Truth: The criminalisation of people arriving to the UK on 'small boats'](#).

*Slavery Guidance* recognises many of these barriers to disclosure.<sup>55</sup> The legislation would therefore require behaviours that may themselves result from a child's exploitation to count against their credibility unless they can establish a good reason for them.

This is compounded by the Bill's new *Claim notices*. People liable to removal or deportation could be required to provide all relevant immigration, protection and trafficking information by a specified deadline. Trafficking information disclosed after that deadline must be treated as delayed for the purposes of assessing credibility.<sup>56</sup> A child or young person's identification as a victim should not depend on whether they were able to recognise, understand and disclose their exploitation within an immigration deadline.

The provisions on the *Recovery period following reasonable grounds decision* would allow the recovery period to end immediately where a negative Conclusive Grounds decision is made within the first 30 days following a positive Reasonable Grounds decision. A child could therefore lose the statutory recovery period less than 30 days after being identified as a potential victim, despite Article 13 ECAT providing for a recovery and reflection period of at least 30 days where there are reasonable grounds to believe a person is a victim.

The *Disqualification from protection provisions* would significantly extend the circumstances in which a child can be excluded from NRM protection. They sit alongside the proposed commencement of section 29 of the Illegal Migration Act 2023, which would make public order disqualification mandatory where the statutory conditions are met and substantially widen the conviction-based definition of a threat to public order. In particular, foreign nationals sentenced to imprisonment would no longer need to have received

a sentence of at least 12 months to fall within the provision. The Bill would extend this further by including suspended sentences. It would also narrow the safeguard against disqualification to circumstances where there is an 'immediate and significant' risk of trafficking or re-trafficking in the UK.<sup>57</sup>

The Bill introduces a child exemption, but only for children who have a right of abode or existing leave to remain other than trafficking-specific Victim of Trafficking or Slavery (VTS) Leave. Children with insecure immigration status would remain subject to public order disqualification. Where they are disqualified, protection from removal and any entitlement to VTS leave would cease and no Conclusive Grounds decision would be made. Children experiencing the same exploitation and offending could therefore receive different trafficking protections according to their immigration status.

For children exploited through criminal activity, the conviction used to exclude them from trafficking protections may itself be connected to their exploitation. The application of public order disqualification to children to date, including children affected by criminal exploitation and county lines, is examined in [Chapter 4](#).

The *Removal of duty to grant leave to remain to assist recovery* proposal would remove recovery from physical or psychological harm as a statutory basis for granting VTS leave, leaving compensation and cooperation with investigations or criminal proceedings as the remaining grounds. Its implications for children, including the very small number currently granted trafficking-specific leave and the child-specific residence provisions of ECAT, are examined in [Chapter 4](#).

<sup>55</sup> Home Office. (2026). [Modern Slavery: Statutory Guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and Non-Statutory Guidance for Scotland and Northern Ireland](#).

<sup>56</sup> The Bill expressly provides that relevant trafficking information supplied after a claim-notice deadline is treated as delayed for the purposes of the credibility provisions.

<sup>57</sup> The combined effect of the proposed commencement of section 29 and the Bill includes mandatory disqualification where the statutory conditions are met, the wider conviction threshold, inclusion of suspended sentences and the new child exemption.

The provisions concerning *Independent Child Trafficking Guardians* would formally adopt the term 'guardian', place aspects of direct and indirect support on a statutory footing and require public authorities to involve guardians in relevant discussions and decisions. They would also remove the Secretary of State's existing duty to report to Parliament on implementation of the statutory guardianship provisions. These changes and the expansion of the ICTG service across England and Wales are considered in [Chapter 4](#).

The *Assistance and support for identified potential victims provisions* would remove children from the Secretary of State's statutory duty under section 50A of the Modern Slavery Act 2015 to secure necessary assistance and support for potential victims during their recovery period. The Government states that this reflects 'operational realities', because child victims are already supported and safeguarded by local authorities and other agencies under children's legislation.<sup>58</sup>

Child trafficking is child abuse and children should be cared for and safeguarded through the child protection system rather than a parallel Home Office system. However, the existence of children's social care duties does not establish that every trafficked child receives the specific assistance required under Article 12 ECAT, nor that local authorities have the resources to provide it. There is currently no dedicated funding attached to a child's identification as a potential victim of trafficking. Children living with their families therefore attract no additional local authority funding because of their trafficking-specific needs.

There is also no national mechanism for establishing whether children referred into the NRM actually receive their ECAT entitlements. NRM data does not show whether a child becomes looked after, is supported as a child in need or through child protection procedures, or what trafficking-specific assistance they receive. Being known to children's services does

not itself establish that a child has received safe accommodation, psychological and medical treatment, material assistance or other support necessary for recovery. The Bill would therefore remove an express statutory duty on the Secretary of State without an equivalent trafficking-specific funding or accountability mechanism to establish whether children receive the assistance to which they are entitled.

Other parts of the Bill are not specific to trafficking but will affect some child victims. The Bill would replace most immigration and asylum appeals currently heard by the First-tier Tribunal with a new Independent Immigration Appeals Authority, while the new claim-notice and late-claims regime would place greater emphasis on when protection and trafficking information is disclosed. This has particular relevance for trafficked children and young people whose exploitation may only emerge over time.

The Bill would also significantly reform the statutory approach to Article 8 of the European Convention on Human Rights (ECHR) concerning family and private life, including by defining the 'core cohabiting family' for these purposes. These changes may affect trafficked and separated children whose immigration cases engage family relationships, private life and their best interests. Alongside the new credibility rules and claim notices, they add to an increasingly complex immigration framework through which non-British child victims may have to navigate recognition, protection and secure status.

The Bill therefore combines provisions that put devolved NRM decision-making and elements of the ICTG model on a statutory footing with measures that risk penalising children for how and when they disclose exploitation, creating different access to trafficking protection according to immigration status, and removing an existing statutory support duty for child victims.

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<sup>58</sup> Home Office. (2026). *Immigration and Asylum Bill: Explanatory Notes*, para 326.

## Government policy

During 2025–26, the Government pursued a Modern Slavery Action Plan covering prevention, victim identification and support, law enforcement and exploitation in the labour market. By March 2026, work relevant to children included a cross-sector Data and Evidence Group, whose initial focus was child exploitation; reform of the NRM identification system; expansion of devolved NRM decision-making for children; procurement of a new national Independent Child Trafficking Guardian service; and changes intended to improve the transition through the NRM for young people turning 18. The Government also reported progress towards reducing the NRM decision-making backlog and work towards a national framework for modern slavery investigations. The longer-term direction of some of this work remains developing, particularly alongside the significant legislative changes proposed in the Immigration and Asylum Bill.

### Reform of victim identification and devolved NRM decision-making

In July 2025, the Home Office launched a call for evidence on the *Identification of victims of modern slavery*, examining definitions of modern slavery, initial identification and referral, and formal decision-making within the NRM. The summary of responses, published in February 2026, identified particular issues for children. Respondents emphasised that children require a different approach to identification, including recognition that children cannot consent to exploitation and that proof of coercion or deception should not be required. Many supported devolved, multi-agency decision-making for children, alongside national oversight to maintain consistency.<sup>59</sup>

This builds on the Home Office's devolved NRM decision-making pilot, introduced in 2021 to test whether decisions about child victims are better made

within existing safeguarding structures. Under the model, Reasonable Grounds and Conclusive Grounds decisions are made through multi-agency structures involving the local authority, police and health rather than solely by a Home Office competent authority.<sup>60</sup> The pilot began with ten sites, expanded to 20 in 2023 and entered a further phase of expansion in 2025. Northern Ireland joined the programme in 2026, with separate decision-making guidance reflecting its legal and safeguarding framework.

The model offers an opportunity to bring trafficking identification closer to the child protection system and to professionals who know the child and are responsible for their safeguarding. As it expands, adequate resourcing, specialist knowledge, training and national quality assurance will be important to avoid variation between areas and ensure that children receive consistent identification and protection. The Immigration and Asylum Bill would provide a statutory basis for the Secretary of State to designate public authorities to make NRM decisions for children, as discussed above.<sup>61</sup>

### Wider reforms affecting child victims

Several wider reforms will also shape the response to child trafficking and exploitation. The Children's Wellbeing and Schools Act 2026 and associated social care reforms are considered in [Chapter 4](#), while the Youth Justice White Paper and Crime and Policing Act 2026 reforms are particularly relevant to children affected by criminal exploitation.

The statutory Independent Inquiry into Grooming Gangs, established in April 2026 following Baroness Casey's National Audit, will examine institutional responses to group-based child sexual exploitation and abuse in England and Wales. Its terms of reference expressly recognise that this form of exploitation can include trafficking children for sexual exploitation.<sup>62</sup>

<sup>59</sup> Home Office. (2026). [Identification of victims of modern slavery: call for evidence summary of responses](#).

<sup>60</sup> Home Office. (2026). [Piloting devolving decision making for child victims of modern slavery](#).

<sup>61</sup> Home Office. (2026). [Decision making guidance for pilot sites Northern Ireland](#).

<sup>62</sup> Home Office. (2026). [Independent Inquiry into Grooming Gangs: terms of reference](#).

### Developments in Scotland

Scotland's revised *Trafficking and Exploitation Strategy*, published in July 2025, adopts a public health approach spanning primary prevention, early intervention and recovery and prevention of re-trafficking. A Delivery Plan for 2026–28, published in August 2026, sets out actions across victim identification and support, disruption and prosecution, data and evidence, and prevention. Measures particularly relevant to children include work to prevent the criminalisation of exploited children, review transitions for child victims, monitor devolved NRM decision-making, embed contextual safeguarding, strengthen responses to online exploitation and improve data and information sharing.<sup>63</sup>

There has also been significant policy activity on child sexual and criminal exploitation. A national review led by four inspectorates has examined local responses to group-based child sexual abuse and exploitation and child criminal exploitation, including identification, information sharing, safeguarding, disruption and prosecution. In February 2026, the Scottish Government announced a separate statutory public inquiry into group-based child sexual abuse and exploitation, chaired by Professor Alexis Jay, alongside a Scottish Truth Project to enable victims and survivors to share their experiences and inform future improvements.<sup>64</sup>

### Developments in Northern Ireland

Northern Ireland's cross-departmental *Child Criminal Exploitation Action Plan*, led by the Departments of Justice, Health and Education, provides a framework for recognising CCE as child abuse and strengthening prevention, protection and the pursuit of perpetrators. Its commitments include professional training and guidance, risk assessment tools, clearer child protection pathways, improved data on the nature and scale of exploitation, and awareness-raising for children, parents and carers.<sup>65</sup> Criminal Justice Inspection Northern Ireland's February 2026 inspection of the criminal justice response to CCE has provided further scrutiny of how children experiencing criminal exploitation are recognised and protected, following its earlier work on child sexual exploitation.<sup>66</sup>

Recent scrutiny has also highlighted wider safeguarding challenges for some groups of children. In September 2026, the Northern Ireland Commissioner for Children and Young People published *Rights Without Borders*, examining the experiences and rights of asylum-seeking and refugee children. The report identified inconsistent access to safeguarding and welfare support and called for clearer responsibility and more coordinated responses across government departments and agencies.<sup>67</sup> These issues are particularly relevant to unaccompanied and separated children who may also be vulnerable to trafficking and exploitation.

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<sup>63</sup> Scottish Government. (2025). *Scotland's Trafficking and Exploitation Strategy 2025*; Scottish Government. (2026). *Scotland's Trafficking and Exploitation Strategy Delivery Plan 2026–2028*

<sup>64</sup> Care Inspectorate. (2026). *National review of group-based child sexual abuse and exploitation and child criminal exploitation: key findings*; Scottish Government. (2026). *Public inquiry into group-based child sexual abuse*.

<sup>65</sup> Department of Justice, Department of Health and Department of Education. (2024). *Child Criminal Exploitation Action Plan*.

<sup>66</sup> Criminal Justice Inspection Northern Ireland. (2026). *An Inspection of Child Criminal Exploitation in Northern Ireland*; Criminal Justice Inspection Northern Ireland. (2025). *Child Sexual Exploitation Follow-Up Review: An assessment of the criminal justice system's response*.

<sup>67</sup> Northern Ireland Commissioner for Children and Young People. (2026). *Rights Without Borders: Examining Safeguarding Rights for Asylum Seeking and Refugee Children in Northern Ireland through the Lens of the UNCRRC*.

The UK Government and devolved administrations must ensure that the child criminal exploitation offence and prevention orders introduced by the Crime and Policing Act 2026 are implemented consistently across the UK, supported by the statutory guidance, specialist training and monitoring to ensure that children are identified and protected as victims of exploitation and perpetrators are held accountable.

The UK Government must amend immigration legislation to prevent children from being prosecuted for offences connected to their arrival in the UK, and ensure that where age is disputed no prosecution proceeds until age has been determined through an appropriate child-sensitive age assessment process.

The UK Government must remove provisions in the Immigration and Asylum Bill that require delayed disclosure, inconsistencies and omissions to be treated as damaging to credibility, ensuring that trafficking identification reflects the ways victim disclose abuse and exploitation.

The UK Government must ensure that every child identified as a potential victim receives the assistance and support required under ECAT, and must not remove existing statutory duties to secure trafficking-specific support for children without equivalent duties, adequate funding and mechanisms to monitor whether children receive their entitlements.



## CHAPTER 3: PREVENTION

Over the last decade, child exploitation has moved higher up the safeguarding and public protection agenda. Developments including the Modern Slavery Act 2015, the County Lines Programme, the Online Safety Act 2023 and investment in prevention initiatives have contributed to greater recognition of the different contexts in which exploitation occurs. Contextual safeguarding has also influenced professional understanding of harm beyond the family home, including within peer groups, schools, neighbourhoods, transport networks and online spaces.

Approaches differ across the four nations of the UK, reflecting different legislation, policy and service structures. However, common challenges remain. Preventative support is uneven, access to specialist services often depends on where a child lives, and resources continue to be concentrated on responding to harm after it has occurred. The UK also lacks a national child exploitation strategy bringing together prevention across safeguarding, education, health, youth services, policing and the online environment.

### Prevention landscape

Child exploitation is associated with a complex range of individual, familial and structural factors. Adversity, family instability, school exclusion and persistent absence, poor mental health, poverty and socioeconomic disadvantage, exposure to violence and harm beyond the family home can all increase vulnerability to exploitation. Research on child trafficking and contextual safeguarding has consistently demonstrated the limitations of approaches focused solely on individual children or criminal justice responses. Effective prevention

requires action across children's social care, education, youth services, health and community safety, alongside disruption of those responsible for exploitation.<sup>68</sup>

Early intervention can both reduce harm and prevent children reaching the point at which crisis intervention is required. Yet spending patterns across children's services have increasingly shifted towards acute and statutory intervention, particularly residential care, while preventative and early-help services have experienced sustained pressure.<sup>69</sup>

There has nevertheless been important investment in programmes aimed at improving early identification, awareness and multi-agency responses. These include the Home Office-funded Prevention Programme and #LookCloser campaign delivered by The Children's Society, the County Lines Programme and National County Lines Coordination Centre, and the Child Exploitation Disruption Toolkit.<sup>70</sup> These initiatives demonstrate increasing recognition that exploitation must be identified earlier and addressed across professional and community settings. However, much national activity continues to focus on disruption and responding to exploitation once harm has occurred, rather than primary prevention.

### The Children's Society Prevention Programme

The Home Office-funded Prevention Programme, delivered by The Children's Society since 2019, is one of the most established national initiatives focused specifically on preventing child exploitation in England and Wales. It works across child criminal exploitation, child sexual exploitation, modern slavery and emerging forms of exploitation, including child financial exploitation, through professional learning, partnership working, systems change and public awareness.

<sup>68</sup> Celiksoy, E., Wroe, L., Bunting, L., Firmin, C. et al. (2024). [Prevention and Identification of Children and Young Adults Experiencing, or at Risk of, Modern Slavery in the UK](#); Firmin, C. et al. (2022). [Contextual Approaches to Schools: Developing Safeguarding Pathways and Practices for School Contexts](#). Contextual Safeguarding Network.

<sup>69</sup> The Children's Society. (2023). [The Well-Worn Path](#); Institute for Government. (2023); [Performance Tracker 2023: Children's Social Care](#).

<sup>70</sup> The Children's Society. (2025). [Prevention Programme 2023–25: A Focused Evaluation Report](#); The Children's Society. (2026). [#LookCloser Campaign](#); Home Office. (2026). [County Lines Programme data](#); National Police Chiefs' Council. (2026). [National County Lines Coordination Centre](#); Home Office. (2022). [Child Exploitation Disruption Toolkit](#).

Between April 2023 and March 2025, the programme delivered 730 activities and recorded approximately 680,000 engagements. Almost 60% of activities focused on systems change, including work to improve safeguarding processes, disrupt perpetrators and influence professional practice. Its evaluation found evidence of increased knowledge and confidence among professionals, with 93% of respondents attending #LookCloser learning sessions reporting that they felt better prepared to identify signs of child exploitation.<sup>71</sup>

The evaluation also identified changes in professional practice, including more child-centred language, improved information sharing and multi-agency working, greater use of disruption approaches and efforts to challenge victim-blaming attitudes. However, embedding longer-term change remained dependent on factors including local leadership, workforce capacity, commissioning and continuity of funding.<sup>72</sup>

The programme's #LookCloser campaign has been its most visible strand. It seeks to increase recognition of exploitation among professionals, businesses and the public, including people working in hotels, transport, retail and the night-time economy who may encounter children while they are being exploited. This reflects an important principle of prevention: opportunities to identify exploitation extend well beyond traditional safeguarding services.

## Education and prevention

Schools and colleges are central to prevention. Regular contact with children creates opportunities to identify changes in behaviour, attendance or circumstances at an early stage, while education can equip children to recognise grooming, coercion, unhealthy relationships and online risks.

Statutory guidance, *Keeping Children Safe in Education*, identifies CSE, CCE and serious violence as safeguarding concerns and recognises indicators including going missing and persistent absence from education. It also makes clear that children who have been exploited may require additional support to remain in education.<sup>73</sup>

Contextual safeguarding has further developed understanding of the role schools can play in responding to harm outside the family home. Rather than focusing exclusively on risks within an individual child or family, contextual approaches consider the peer groups, places and social environments in which harm occurs. In some areas this has led to contextual assessments, school safety meetings and closer collaboration between schools, children's social care, youth services, police and safeguarding partnerships.<sup>74</sup>

Alongside these safeguarding responsibilities, Relationships, Sex and Health Education and wider Personal, Social, Health and Economic Education (PSHE) provide opportunities to address healthy relationships, consent, grooming, coercion and online safety.<sup>75</sup> However, the quality and availability of preventative education remain inconsistent. Children who are excluded, persistently absent or outside mainstream education can also be among those most vulnerable to exploitation while having reduced access to the protective relationships and prevention education that schools can provide.

<sup>71</sup> The Children's Society. (2025). *Prevention Programme 2023–25: A Focused Evaluation Report*.

<sup>72</sup> Ibid.

<sup>73</sup> Department for Education. (2026). *Keeping Children Safe in Education 2026*.

<sup>74</sup> Firmin, C. et al. (2022). *Contextual Approaches to Schools: Developing Safeguarding Pathways and Practices for School Contexts*; Contextual Safeguarding Network; Contextual Safeguarding Network. (n.d.). *Schools: Scale-Up Toolkit*.

<sup>75</sup> Department for Education. (2021). *Relationships Education, Relationships and Sex Education (RSE) and Health Education: Statutory Guidance*.

### Child criminal exploitation and county lines

The County Lines Programme and National County Lines Coordination Centre represent one of the most substantial national responses to child criminal exploitation. The programme combines policing and disruption with safeguarding referrals and specialist support for children and young people affected by county lines.<sup>76</sup>

Between April 2025 and March 2026, the five County Lines Programme Taskforces reported 2,217 line closures, 3,303 arrests and 3,735 safeguarding referrals. Across all County Lines Programme-funded law enforcement activity between July 2024 and March 2026, 6,939 safeguarding referrals were made and 882 children and young people received support through the dedicated specialist support service.<sup>77</sup>

An independent evaluation of the programme found evidence of reductions in some drug and violence-related harms in areas receiving targeted investment, including reductions in weapon-related hospitalisations and drug-related hospitalisations in exporter force areas. It also found substantial increases in law enforcement activity.<sup>78</sup>

The programme reflects greater recognition that children involved in county lines may be victims of exploitation requiring safeguarding and support. However, enforcement and disruption cannot substitute for prevention. Home Office estimates suggest that approximately 15,500 children were identified as involved in or at risk of CCE in the year ending March 2025, a figure the Government acknowledges is likely to significantly underestimate the scale of harm.<sup>79</sup> Preventing criminal exploitation

therefore also requires investment in the conditions and services that protect children before exploitation becomes established, including education, youth services, family support and trusted relationships.

### Survivor involvement in prevention

Children and adults with lived experience of trafficking and exploitation have an important role in shaping prevention. Research commissioned by the Modern Slavery and Human Rights Policy and Evidence Centre found that meaningful lived-experience engagement can improve understanding of how exploitation occurs, strengthen trust and engagement, and help ensure that anti-trafficking policies and programmes respond to the realities experienced by victims and survivors.<sup>80</sup>

ECPAT UK's Youth Advisory Group (YAG) enables young people with experience of trafficking and exploitation to contribute directly to research, policy, campaigns and organisational strategy. Young people have helped identify gaps in safeguarding responses and shape recommendations on the issues affecting children experiencing exploitation.<sup>81</sup>

The Independent Anti-Slavery Commissioner has also sought to strengthen survivor participation. In 2026, the Commissioner convened Lived Experience Advisory Panel summits bringing together survivors and representatives of lived-experience groups, including ECPAT UK's YAG, to identify priorities, share learning and inform wider policy discussions.<sup>82</sup> Meaningful participation requires more than consultation: children and survivors should have opportunities to influence how problems are defined, which interventions are developed and how their effectiveness is assessed.

<sup>76</sup> Home Office. (2026). [County Lines Programme data](#); National Police Chiefs' Council. (2026). [National County Lines Coordination Centre](#).

<sup>77</sup> Ibid.

<sup>78</sup> Home Office. (2025). [Evaluation of the County Lines Programme](#).

<sup>79</sup> Home Office. (2026). [County Lines Programme data](#).

<sup>80</sup> Asquith, W., Kiconco, A. and Balch, A. (2022). [A Review of Promising Practices in the Engagement of People with Lived Experience to Address Modern Slavery and Human Trafficking](#). Modern Slavery and Human Rights Policy and Evidence Centre.

<sup>81</sup> ECPAT UK. (2026). [Supporting Young People: Youth Advisory Group](#).

<sup>82</sup> Independent Anti-Slavery Commissioner. (2026). [Survivor engagement](#).

## Online prevention

Online environments are increasingly integrated into the ways children are groomed, recruited, controlled and exploited. Social media, gaming platforms, messaging services and livestreaming applications can enable offenders to contact children, develop relationships and facilitate exploitation. The distinction between online and offline exploitation is therefore increasingly artificial, with children's experiences often moving between both.

The Online Safety Act 2023 introduced statutory duties requiring regulated services to assess and mitigate risks to children. Ofcom's child safety regime requires services likely to be accessed by children to assess risks and introduce proportionate measures to protect them from harmful content. Its *Protection of Children Codes* include measures relating to safer service design, governance, reporting and age-appropriate protections.<sup>83</sup> This represents an important shift from relying primarily on voluntary action by technology companies towards statutory regulation.

Prevention activity has also expanded beyond regulation. The National Crime Agency (NCA)'s Child Exploitation and Online Protection (CEOP) Education programme provides resources for children, parents and professionals on online sexual abuse and exploitation.<sup>84</sup> In 2025, the NCA launched a campaign focused on financially motivated sexual extortion targeting teenage boys following evidence of low awareness of the risks and routes to reporting.<sup>85</sup>

Charities have similarly developed resources on online grooming and exploitation. The National Society for the Prevention of Cruelty to Children (NSPCC) and Childline provide information and support on grooming and online safety, while The Children's Society has highlighted emerging forms of child financial exploitation, including the recruitment of children through online platforms to move money, facilitate fraud or become involved in other financially motivated offending.<sup>86</sup>

These developments are important, but significant gaps remain. Safeguarding systems do not always reflect the extent to which online and offline exploitation overlap, while technology and offender methods can change considerably faster than policy and professional practice. Evidence about the effectiveness of many online prevention interventions also remains limited.

<sup>83</sup> Ofcom. (2026). *Protection of Children Duties under the Online Safety Act*; Ofcom. (2025). *Online Safety Regulatory Documents and Guidance: Protection of Children Codes of Practice*.

<sup>84</sup> National Crime Agency. (2026). *CEOP Education*.

<sup>85</sup> National Crime Agency. (2025). *National Crime Agency launches online campaign to tackle 'sextortion' among young teenage boys*.

<sup>86</sup> NSPCC. (2026). *Keeping children safe online*; NSPCC. (2026). *Grooming*; The Children's Society. (2026). *What is financial exploitation?*.

### The need for a national child exploitation strategy

The prevention landscape has developed considerably but remains fragmented. The Children's Society Prevention Programme, contextual safeguarding, county lines interventions, education, youth work and online safety regulation all demonstrate different elements of an effective response. Too often, however, these operate as separate initiatives rather than as part of a coherent national framework.

This fragmentation contributes to significant geographical variation. Access to specialist prevention activity can depend on local leadership, commissioning decisions, workforce capacity and short-term funding. It also makes it harder to address forms of exploitation that cut across established policy and service boundaries.

A national child exploitation strategy should bring together the prevention of sexual, criminal, financial and other forms of exploitation within a common child protection framework. It should establish clear national priorities for primary prevention and early intervention, while recognising the roles of social care, education, health, youth services, policing, communities and technology companies. Prevention cannot depend principally on identifying children once exploitation is already established. A sustainable approach requires investment in the services, relationships and environments that reduce vulnerability and increase safety before harm occurs.

The UK Government must develop a cross-government child exploitation strategy with prevention at its core, establishing a national framework for preventing all forms of child exploitation, strengthening coordination across government, education and early intervention, embedding contextual safeguarding, addressing exploitation in online environments, and setting clear outcomes against which prevention activity can be evaluated.

The UK Government must provide sustained investment in early help, youth services and specialist child exploitation services to ensure that children and families can access preventative support before exploitation occurs or becomes entrenched, reducing geographical inequalities in provision and reliance on short-term funding.



## CHAPTER 4: PROTECTION

## Identification

Identification is a critical first step in protecting children who have experienced trafficking and exploitation. Children who are not identified may be left without recognition of the harm they have experienced, appropriate safeguarding and specialist support, and may remain at risk of further exploitation. Identification can be particularly challenging for children, who may not recognise their experiences as exploitation, may be fearful of disclosing abuse, or may disclose information gradually as relationships of trust develop.

The NRM is the UK's framework for formally identifying potential victims of trafficking and modern slavery. Where a First Responder has concerns that a child may be a victim, a referral must be made to the NRM and the child's consent is not required.<sup>87</sup> The NRM operates a two-stage decision-making process. At the Reasonable Grounds (RG) stage, the decision maker considers whether there are reasonable grounds to believe that the child is a victim of modern slavery. Following a positive RG decision, a Conclusive Grounds (CG) decision determines whether, on the balance of probabilities, there is sufficient information to conclude that the child is a victim.<sup>88</sup>

These decisions have important consequences for children. However, formal identification through the NRM should operate alongside, rather than replace, the wider child protection response. The statutory guidance makes clear that safeguarding the child must take priority, and the identification and protection of children from trafficking and exploitation requires coordinated action across local authorities, police, First Responders and other agencies.<sup>89</sup>

Analysis of NRM data for children referred in 2025 raises important questions about how children are being identified through this process. The following analysis examines both Reasonable Grounds and Conclusive Grounds decisions, including the reasons recorded for negative decisions and differences in outcomes according to children's nationality and circumstances. Attention is given to whether patterns in the data indicate that some groups of children may face greater barriers to formal identification.

### Reasonable Grounds decisions

Of the 7,045 children referred to the NRM in 2025, 1,060 (15%) received a negative Reasonable Grounds (RG) decision.<sup>90</sup> A further 182 children had no recorded RG decision.<sup>91</sup> There were substantial differences in negative decision rates by nationality. The chart below shows the largest nationality groups, using mutually exclusive categories so that children with UK nationality, including dual nationals, are counted as UK nationals.

<sup>87</sup> Home Office. (2026). Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland.

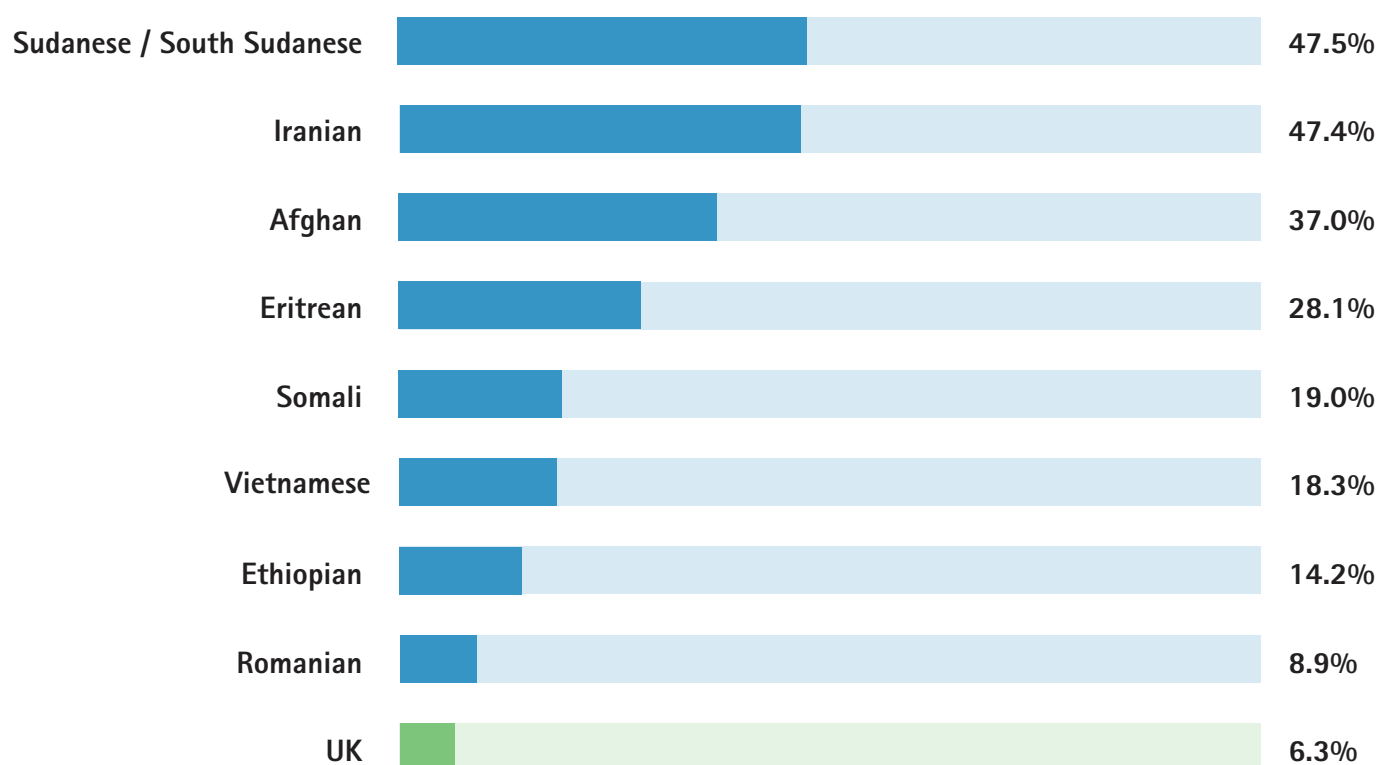
<sup>88</sup> Ibid.

<sup>89</sup> Ibid.

<sup>90</sup> Home Office, Modern Slavery Research & Analysis. (2026). National Referral Mechanism and Duty to Notify Statistics, 2014–2026. 21st Edition. UK Data Service. SN: 8910.

<sup>91</sup> Ibid.

Figure 1: Negative Reasonable Grounds decision rate by nationality, children referred in 2025



*Note: The negative RG rate is the percentage of children within each nationality group who received a negative Reasonable Grounds decision out of all children of that nationality referred to the NRM in 2025. Data table can be found in [Annex 1](#).*

Almost half of Sudanese/South Sudanese and Iranian children received a negative RG decision, compared with 6% of UK children.<sup>92</sup> Afghan and Eritrean children also had substantially higher negative decision rates. The differences were not explained simply by age or gender, substantial disparities remained when older children and boys were examined separately and were also evident among children referred by the same type of first responder and for the same broad form of exploitation.

Across all children referred to the NRM in 2025, regardless of nationality, the location of the

exploitation was strongly associated with the likelihood of receiving a negative decision. Among children whose exploitation was recorded as taking place in the UK, 8% received a negative RG decision, compared with 34% of children whose exploitation occurred overseas and 32% of those exploited both in the UK and overseas.<sup>93</sup> However, location alone did not account for the differences between nationalities. Among children whose exploitation occurred overseas, negative RG rates ranged from 13% for Ethiopian children and 19% for Somali children to 49% for Sudanese/South Sudanese children, 54% for Afghan children and 63% for Iranian children.<sup>94</sup>

<sup>92</sup> Ibid.

<sup>93</sup> Ibid.

<sup>94</sup> Ibid.

### Reasons for negative decisions

The reasons recorded for negative RG decisions provide further insight into how children were being refused identification. Of the 1,060 children who received a negative RG decision, 709 (67%) were found not to meet the definition of modern slavery, while 342 (32%) were refused because there was insufficient information to meet the required standard of proof.<sup>95</sup> Credibility was very rarely cited: eight decisions (less than 1%) recorded both that the child was not credible and had not met the definition, while only one negative decision was based on credibility alone. This may change if the proposed changes to the consideration of credibility under the Immigration and Asylum Bill are enacted, as discussed in [Chapter 2](#).

There were differences according to the circumstances of the referral. Insufficient information was considerably more common among children whose reported exploitation occurred overseas, accounting for 48% of negative decisions, compared with 18% where exploitation occurred in the UK.<sup>96</sup> Older children were also more likely to receive an insufficient-information decision: this accounted for 36% of negative decisions for 15–17-year-olds, compared with 13% for children aged 14 or younger.<sup>97</sup> Similarly, insufficient information accounted for 35% of negative decisions for boys compared with 17% for girls.<sup>98</sup>

The pattern for children whose exploitation type was recorded as 'not specified or unknown' is particularly notable. Of the 420 negative RG decisions in this group, 344 (82%) were made on the basis that the circumstances did not meet the definition of modern slavery, compared with 72 (17%) because there was insufficient information.<sup>99</sup> Where the nature of a child's potential exploitation has not been specified or remains unknown, the predominance of decisions that the definition has not been met, rather than that there

is insufficient information, raises questions about how uncertainty and incomplete information are being approached at the Reasonable Grounds stage.

These findings do not establish why these disparities occur or demonstrate that nationality itself determines decision-making. Differences in the circumstances and evidence available in individual cases may contribute to the patterns. Nevertheless, the scale and consistency of the disparities raise important questions about how the Reasonable Grounds test is being applied to children, particularly those exploited overseas, and whether some groups of children face greater barriers to identification. Further scrutiny is needed of how evidence is gathered and assessed, how cases involving uncertain or emerging indicators of exploitation are approached, and whether decision-making is operating consistently across different groups of children.

### Conclusive Grounds decisions

Of the 7,045 children referred to the NRM in 2025, 4,260 had received a positive Conclusive Grounds (CG) decision and 1,015 a negative CG decision.<sup>100</sup> A further 1,769 children had no recorded CG decision, and one child was recorded as disqualified on public order grounds.<sup>101</sup> Because a quarter of children referred in 2025 had no recorded CG decision, comparing negative decisions as a proportion of all referrals can be misleading. The analysis below therefore considers the negative CG rate among children who had received either a positive or negative CG decision.

There were substantial differences by nationality. Among children with a recorded positive or negative CG decision, 44% of Sudanese/South Sudanese children and 40% of Iranian children received a negative decision, compared with 16% of UK children.<sup>102</sup> Negative decision rates were also higher for Eritrean children (32%), Afghan and Somali children (both 28%), and Ethiopian children (25%).<sup>103</sup>

<sup>95</sup> Ibid.

<sup>96</sup> Ibid.

<sup>97</sup> Ibid.

<sup>98</sup> Ibid.

<sup>99</sup> Ibid.

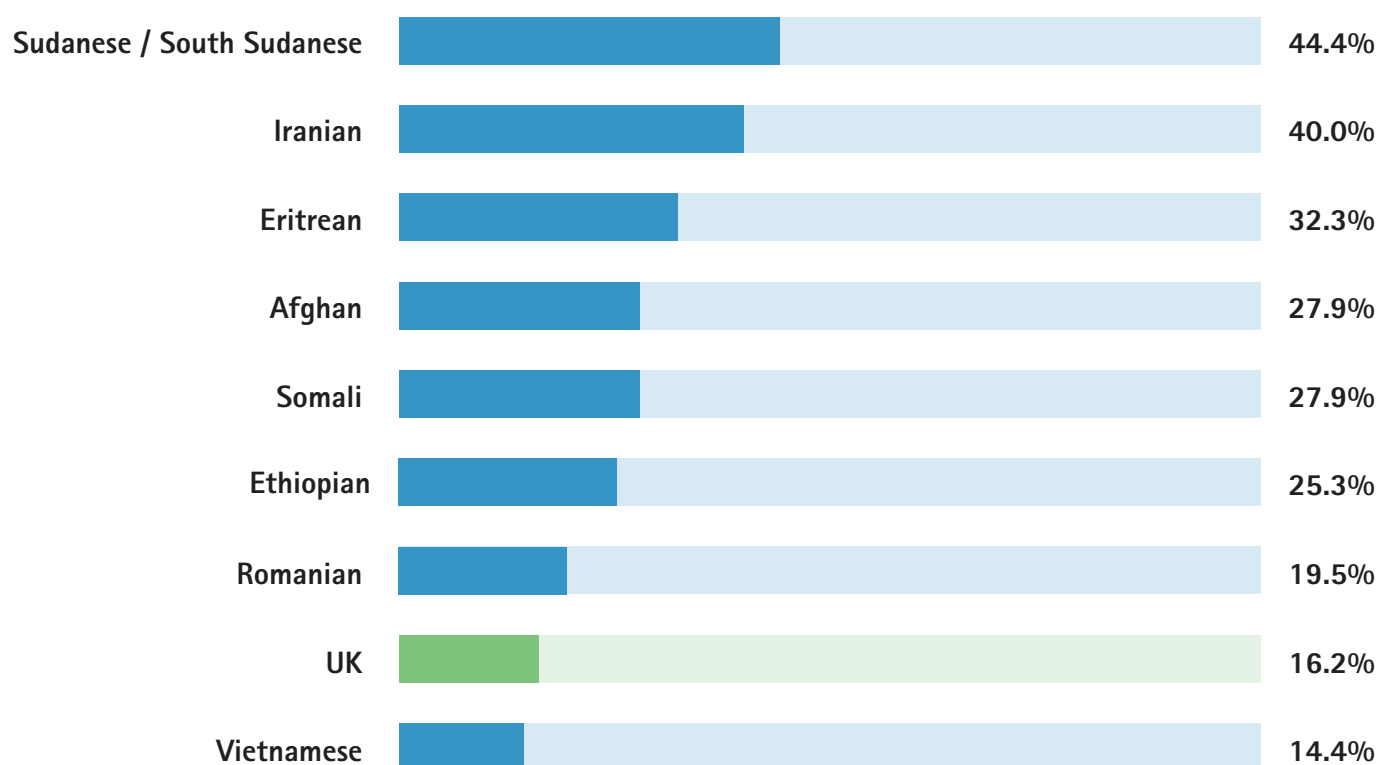
<sup>100</sup> Ibid.

<sup>101</sup> Ibid.

<sup>102</sup> Ibid.

<sup>103</sup> Ibid.

**Figure 2: Negative Conclusive Grounds decision rate by nationality, children referred in 2025**  
 Children referred to the NRM in 2025



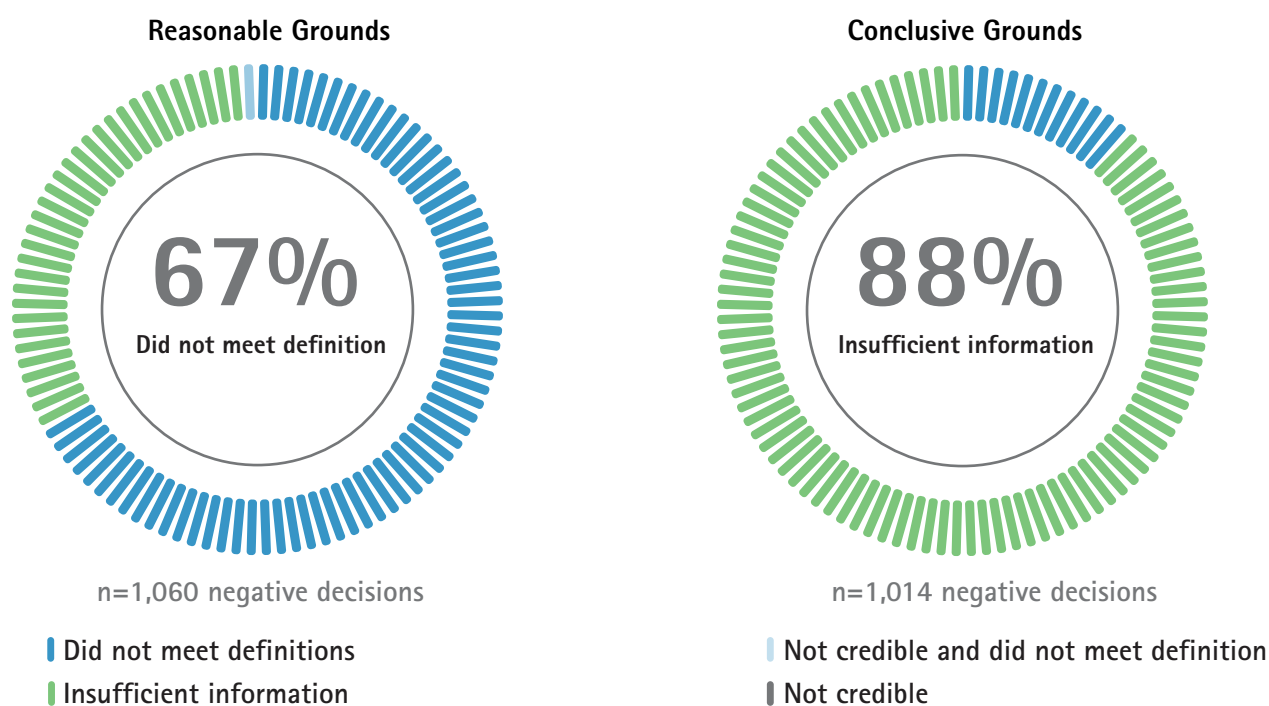
*\*The negative CG rate is the percentage of children within each nationality group who received a negative decision among those who had received either a positive or negative CG decision. Children without a recorded CG decision are excluded. Data table can be found in [Annex 1](#).*

These figures should be interpreted with some caution because the proportion of children without a recorded CG outcome also varied considerably between nationality groups. For example, more than half of Sudanese/South Sudanese and Iranian children referred in 2025 had no CG decision recorded, compared with around one in six UK children. The figures therefore describe outcomes among children whose cases had reached a CG decision and should not be interpreted as the eventual outcomes of the entire 2025 referral cohort.

#### Reasons for negative decisions

The reasons for negative CG decisions differed markedly from those recorded at the Reasonable Grounds stage. A reason was recorded for 1,014 negative CG decisions. Of these, 894 (88%) were negative because there was insufficient information to meet the required standard of proof, while 117 (12%) were found not to meet the definition of modern slavery. Credibility was cited in only three cases: two were recorded as both not credible and not meeting the definition, and one as not credible alone.

Figure 3: Reasons for negative RG and CG decisions for children referred to the NRM in 2025



*Note: Percentages are rounded. The figure covers recorded decision reasons for the 2025 child referral cohort, rather than all decisions issued during 2025. The CG figures exclude cases without a recorded reason. Data table can be found in [Annex 1](#).*

This contrasts sharply with negative RG decisions for the same cohort. At the RG stage, 67% of negative decisions were because the circumstances were considered not to meet the definition and 32% because there was insufficient information. At the CG stage this pattern was effectively reversed, with insufficient information accounting for almost nine in ten negative decisions.

Insufficient information dominated negative CG decisions across different circumstances. It accounted for 91% of negative decisions where exploitation occurred overseas and 88% where exploitation occurred in the UK. This suggests that, unlike at the RG stage, the predominance of insufficient-information decisions at CG cannot be explained primarily by children having experienced exploitation overseas.

There was also a notable difference in how cases where the exploitation type was recorded as 'not specified or unknown' were decided at the two stages. Of the 182 negative CG decisions in this group, 152 (84%) were attributed to insufficient information and 30 (16%) to not meeting the definition. At the RG stage, the opposite pattern was evident: 82% of negative decisions for children with an unspecified or unknown exploitation type were made because they were considered not to meet the definition, while 17% were attributed to insufficient information.

This raises questions about how uncertainty in a child's account or the available evidence is treated at different stages of the identification process. Where the form of potential exploitation was not specified or remained unknown, uncertainty at the RG stage was predominantly associated with a finding that the definition had not been met; among cases reaching a negative CG decision, it was predominantly associated with insufficient information.

The high proportion of insufficient-information decisions for children at CG stage also stands out against the wider NRM. Across all negative CG decisions made by the Home Office in 2025, including adults and children, 78% were attributed to insufficient information and 16% to not meeting the definition. In this cohort of children referred during 2025, insufficient information accounted for 88% of negative CG decisions with a recorded reason.<sup>104</sup>

These findings do not establish why these differences occur. Cases may differ in the evidence available, the nature and location of exploitation, the time taken to reach a decision and other factors not captured by this analysis. However, the scale of the nationality differences, alongside the predominance of negative decisions based on insufficient information, warrants further scrutiny of the quality and completeness of information provided by First Responders, the support and guidance available to them, and how NRM decision-makers gather and assess additional evidence at the Conclusive Grounds stage. Further investigation is needed to establish whether gaps in these processes contribute to the disparities in identification outcomes for children.

### Public Order Disqualification

Since the public order disqualification provisions came into force, 19 children at the point of referral into the NRM have been considered for disqualification on public order grounds. Seventeen were subsequently disqualified.<sup>105</sup> Although the numbers remain small, the characteristics of these children raise particular concerns about the interaction between criminal exploitation and exclusion from modern slavery protections.

All 17 children who were disqualified were boys. Sixteen were aged 15 to 17 at referral and one was aged under 15. Six were UK nationals or held UK nationality alongside another nationality. Fifteen were referred in England and two in Wales. All had been exploited in the UK, with one also recorded as having experienced exploitation overseas. Every referral was made by either the police or a local authority.

Criminal exploitation features prominently. Thirteen of the 17 children were flagged for 'county lines'. Eleven had criminal exploitation recorded either alone or in combination with another exploitation type: eight were recorded as experiencing criminal exploitation only, two labour and criminal exploitation, and one sexual, labour, domestic and criminal exploitation. Four were recorded as experiencing labour exploitation only or an unspecified or unknown form of exploitation. The county lines flag for some children whose recorded exploitation type does not include criminal exploitation also indicates inconsistencies within the underlying NRM data and should be treated with caution.

Sixteen of the 17 children who were ultimately disqualified had received a positive Reasonable Grounds decision. The remaining child had no recorded Reasonable Grounds decision in the dataset. This means that, in almost every case, the NRM had already determined that there were reasonable grounds to believe the child was a victim of modern slavery before they were subsequently excluded from protection on public order grounds.

<sup>104</sup> Home Office. (2026). Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2025

<sup>105</sup> Home Office, Modern Slavery Research & Analysis. (2026). National Referral Mechanism and Duty to Notify Statistics, 2014–2026. 21st Edition. UK Data Service. SN: 8910. DOI: 10.5255/UKDA-SN-8910-21.

The data is limited and cannot establish why individual children were considered for or received a public order disqualification. They nevertheless demonstrate that the measure is being applied to children and children identified as experiencing county lines and other forms of criminal exploitation. This creates a particular

tension where the conduct giving rise to public order concerns may itself be connected to the exploitation for which the child was referred to the NRM. The changes to the public order disqualification proposed in the Immigration and Asylum Bill, including their implications for children, are considered further in [Chapter 2](#).

The Home Office must urgently investigate and address the substantial disparities in NRM identification outcomes between UK and foreign national children, including whether nationality, immigration status, experiences of exploitation overseas or other factors are resulting in discriminatory barriers to identification.

The Home Office must ensure that children are not refused identification on the basis that their circumstances do not meet the definition of modern slavery where the nature of their potential exploitation has not yet been established.

The Home Office must strengthen the process for gathering evidence before Conclusive Grounds decisions are made, ensuring that children and the professionals supporting them are given sufficient opportunity and support to provide relevant information before a negative decision is reached on the basis of insufficient information.

## Access to Education

Access to education is an important part of the protection and recovery of children who are at risk or are exploited. Schools can provide stability, trusted relationships with adults and opportunities for concerns to be identified, while prolonged absence, exclusion or disengagement from education can increase children's vulnerability and reduce contact with professionals able to recognise and respond to exploitation.

The relationship between education and protection from trafficking was considered by the Court of Appeal in *R (RWU) v Governing Body of A Academy*. The case concerned a 15-year-old boy who had been permanently excluded from school following escalating behavioural concerns, including possession of cannabis and a significant amount of cash. After the exclusion he was arrested on several occasions and was subsequently referred to the NRM as a potential

victim, receiving a positive Reasonable Grounds decision.

The Court considered when the positive operational duty under Article 4 ECHR is triggered in the context of a child at risk of exploitation. It confirmed that the relevant threshold is whether state authorities knew, or ought to have known, of circumstances giving rise to a credible suspicion that the child had been trafficked, or faced a real and immediate risk of trafficking. Importantly, the Court recognised that schools are public authorities with a role in fulfilling the State's protective obligations and that school can constitute a protective environment for children vulnerable to human trafficking. Where the Article 4 protection duty is triggered in relation to a child facing permanent exclusion, the school must recognise and consider that duty, although this does not mean that permanent exclusion will necessarily be unlawful.

On the facts of the case, the Court upheld the finding that the Article 4 positive operational duty had not been triggered at the time of the permanent exclusion. The child's subsequent arrests, NRM referral and positive Reasonable Grounds decision could not retrospectively determine what the school knew, or ought to have known, months earlier. However, the Court found that the Article 4 duty arose subsequently, following the child's referral into the NRM. The judgment therefore illustrates both the importance of recognising indicators of exploitation within education and the significance of timely referral to the NRM. Schools should raise concerns with children's services, which are designated First Responder Organisations with responsibility for referring potential child victims into the NRM. Formal identification should not be a prerequisite for safeguarding action, but an NRM referral provides formal recognition that there are concerns a child may be a victim of trafficking and can ensure that these concerns are visible to agencies making decisions about their education, safeguarding and wider welfare.

Delays in recognising and referring a potential child victim can mean that significant decisions are taken without their trafficking or exploitation being properly understood.

Losing access to mainstream education for a child already vulnerable to exploitation is often detrimental. During subsequent proceedings, police identified access to education as one of the principal concerns for the child's safety, while the child had been out of full-time education for several months.<sup>106</sup> Schools, local authorities, police and other safeguarding partners therefore need mechanisms to identify possible trafficking and exploitation at an early stage and ensure that decisions about exclusion, alternative provision and reintegration take account of the child's safeguarding needs. Where there are indicators that a child may be exploited, exclusion from school should not result in a corresponding loss of protective oversight or delay access to the NRM and specialist support.

The Department for Education must strengthen statutory guidance on suspension and permanent exclusion to require explicit consideration of trafficking and exploitation risks, including the protective role of education, when decisions are made about children who are experiencing or at risk of exploitation.

<sup>106</sup> *R (RWU) v A Governing Body of A Academy, Order of Hill J*, 18 September 2024, observations [3]–[4].

## Independent Child Trafficking Guardians

Independent Child Trafficking Guardians provide independent support and advocacy to children who have been trafficked or may be at risk of trafficking, helping them navigate complex systems including social care, immigration, asylum, criminal justice and the NRM. The models differ considerably across the UK, including in their statutory basis, eligibility criteria and the nature and duration of support available to children.

### England and Wales

In England and Wales, the Independent Child Trafficking Guardians (ICTG) service provides Direct Support to children who do not have an individual with parental responsibility for them in the UK, and Indirect Support through advice and guidance to professionals supporting children who do. Children with an individual with parental responsibility may exceptionally receive Direct Support where their vulnerability and risk factors indicate that this is required.<sup>107</sup> Guardians can advocate for children across social care, health, education, immigration and criminal justice processes and play an important role in ensuring that agencies understand trafficking and respond to the child's needs and best interests.

Until 2026, the service remained available in only around two-thirds of local authorities, despite section 48 of the Modern Slavery Act 2015 providing for independent child trafficking advocates more than a decade earlier yet not being commenced. In July 2026, the Government announced £25 million over four years to expand the service to every local authority in England and Wales, with Barnardo's continuing as the provider. The expansion will extend the service

from 160 local authorities to the remaining 179, all of which are in England. In the year to March 2025, the service supported 2,730 potential child victims of modern slavery, an increase of 10% on the previous year. More than half were UK nationals and criminal exploitation was the most commonly identified form of exploitation.<sup>108</sup>

Nationwide coverage is a significant and long overdue development, ending the geographical disparity under which a child's access to specialist independent support depended on where they lived. However, geographical expansion alone does not ensure equal access to meaningful guardianship. Under the current model, Direct Support can be delivered through a combination of face-to-face and remote contact, while most children who have someone with parental responsibility in the UK receive support indirectly through the professionals around them.<sup>109</sup> Given the importance of consistent, trusted relationships to disclosure, recovery and protection from further exploitation, the quality, intensity and independence of support available to children will require close scrutiny as the service expands.

There also remain significant gaps for children whose age is disputed. Current *Interim guidance for ICTGs* provides for support where a person is presumed to be a child pending definitive assessment, but excludes people considered adults by the Home Office in an initial visual assessment at port by two officials who consider that their physical appearance and demeanour very strongly suggest that they are significantly over 18.<sup>110</sup> This can leave potential child victims without ICTG assistance to access children's services and an appropriate age assessment conducted by Local Authority social workers at the point when independent advocacy may be most important.

<sup>107</sup> Home Office. (2024). [Interim guidance for independent child trafficking guardians.](#)

<sup>108</sup> Home Office. (2026). [£25 million to deliver vital support for child trafficking victims.](#)

<sup>109</sup> Home Office. (2024). [Interim guidance for independent child trafficking guardians.](#)

<sup>110</sup> Home Office. (2026). [Assessing Age Guidance.](#)

Evidence of incorrect initial age determinations demonstrates the safeguarding risks. Recent Home Office data shows that nearly one in six people initially assessed to be adults between July and December 2025 were subsequently assessed to be children, with further age assessment decisions still outstanding.<sup>111</sup> For potential trafficking victims, an incorrect age decision can also affect access to the NRM, disclosure of exploitation and protection from further trafficking. The ICTG framework should enable Guardians to support putative children to access children's services and remain involved until their age has been properly determined.

Further changes to the statutory framework are proposed in the Immigration and Asylum Bill. These would formally rename the role in the Modern Slavery Act 2015 from an independent child trafficking advocate to an independent child trafficking guardian and amend section 48 so that a Guardian could provide representation or support, or both, either directly to a child or indirectly through people providing services or making decisions about them. The Bill also proposes to remove the requirement for the Secretary of State to report to Parliament on implementation of section 48 of the Modern Slavery Act 2015 once it is commenced.<sup>112</sup> These proposals are considered further in [Chapter 2](#). The legislation should ensure that national expansion strengthens rather than dilutes children's access to direct, independent and consistent advocacy.

### Northern Ireland

Northern Ireland's Independent Guardian Service (IGS) operates on a statutory basis under section 21 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. Revised guidance was issued by the Department of

Health in July 2026. The service supports children who have been or may have been trafficked and are not in contact with a person with parental responsibility, as well as separated children at risk of harm. Eligibility also extends to circumstances where a person with parental responsibility is implicated in an offence or is otherwise not acting in the child's best interests, and support can continue beyond 18 in specified circumstances.<sup>113</sup>

Demand continues to place considerable pressure on the service. There were 209 open cases in 2024 and 195 in 2025, while 146 cases were open during the first six months of 2026. The service received 212 referrals between January 2024 and June 2026, including 107 cases involving a young person with an active NRM referral. Demand now exceeds available capacity, and a waiting list is in operation. The most common nationalities among separated children accessing the service were Somali, Vietnamese, Sudanese and Eritrean.<sup>114</sup>

Northern Ireland joined the devolved child NRM decision-making pilot in January 2026. An Independent Guardian attends each NRM panel, representing the child's views and contributing specialist trafficking expertise. The service has subsequently received referrals involving children from Northern Ireland whose parents or other people with parental responsibility are implicated in their exploitation or are not acting in their best interests. Seven such referrals followed referral to the devolved NRM panel during the first six months of 2026. These were not referrals the service commonly received before the pilot, suggesting that closer integration of guardianship with NRM decision-making may help identify children experiencing exploitation within their families or communities, as well as separated children.

<sup>111</sup> Helen Bamber Foundation, Humans for Rights Network and Refugee Council. (2024). [Forced Adulthood: The Home Office's incorrect determination of age and how this leaves child refugees at risk](#).

<sup>112</sup> UK Parliament. (2026). [Immigration and Asylum Bill: Explanatory Notes](#).

<sup>113</sup> Department of Health Northern Ireland. (2026). [Independent Guardian Service Guidance: Section 21 of the Human Trafficking and Exploitation \(Criminal Justice and Support for Victims\) Act \(Northern Ireland\) 2015](#).

<sup>114</sup> [Barnardo's Independent Guardian Service](#).

However, delays in receiving confirmation of NRM decisions from the Home Office have continued despite the introduction of devolved decision-making. The effectiveness of the model also depends on the capacity of the Guardian service itself. Independent Guardians are intended to establish sustained relationships with children, communicate their views and advocate for them across social care, asylum, NRM and age assessment processes. A waiting list risks delaying precisely the independent relationship that the statutory model is intended to provide.

### Scotland

Guardianship Scotland has operated as Scotland's statutory Independent Child Trafficking Guardian service since April 2023 and is delivered by Aberlour and the Scottish Refugee Council on behalf of the Scottish Government. Under section 11 of the Human Trafficking and Exploitation (Scotland) Act 2015, local authorities must refer eligible children to the service as soon as reasonably practicable. The Scottish model provides specialist support to unaccompanied children who may have experienced or be vulnerable to trafficking, including assistance with trafficking, asylum, welfare, criminal justice and age assessment processes.<sup>115</sup> Scotland's statutory framework also contains an explicit presumption that a person should be treated as a child for relevant support and services where there are reasonable grounds to believe they may be under 18 until their age is formally determined.<sup>116</sup>

Guardianship Scotland reports that NRM decision-making times have improved. However, administrative and communication problems continue to affect children. NRM referrals may, for example, be made by First Responders when children first arrive in Kent before they are subsequently transferred to Scotland through the National Transfer Scheme. Requests from the Single Competent Authority (SCA) for further information may then continue to be directed to the original First Responder rather than the professionals now supporting

the child. Where requests go unanswered, this can contribute to negative decisions.

Guardians can submit a Form of Authority to the SCA to establish their involvement, obtain relevant information and contribute to the child's case. However, decisions are sometimes made before Guardian involvement has been established, requiring reconsideration requests that can be complex and time-consuming. Guardianship Scotland has also identified difficulties with lengthy and unclear SCA communications, uncertainty about which professionals have received correspondence, and decisions being communicated within emails rather than through clearly identifiable formal decision letters. Better coordination between the SCA, First Responders, local authorities and Guardians is needed to ensure that administrative failures do not affect children's identification and protection.<sup>117</sup>

Criminal exploitation has also become an increasing area of work. Guardianship Scotland reports greater awareness among local authorities of the need to consider children's criminal activity through an exploitation and safeguarding lens, with increasing numbers of NRM referrals for criminal exploitation. Guardians have worked with young people and multi-agency professionals to identify circumstances in which involvement in drug supply, illegal tobacco sales and other offending may indicate exploitation rather than simply criminal conduct. This has supported referrals into the NRM and helped shift professional responses towards safeguarding and protection.

The service's national reach also places it in a distinctive position to identify links between cases and emerging patterns of trafficking across different local authority areas. Developing this intelligence function could strengthen understanding of trafficking routes, methods of exploitation and organised networks, but Guardianship Scotland has identified that doing so would require additional capacity and resources.

<sup>115</sup> Scottish Government. (2026). [Child protection](#)

<sup>116</sup> Scottish Government. (2025). [Scotland's Trafficking and Exploitation Strategy](#).

<sup>117</sup> [Guardianship Scotland](#).

Guardianship Scotland also reports that more young people are receiving temporary permission to stay as victims of human trafficking or slavery (VTS), but that grants are frequently for 12 months or less. Short periods of leave provide limited security for children and young people attempting to recover from trafficking and plan for education, accommodation and their future. As recommended in the previous Snapshot, confirmed child victims should be granted a period of immigration leave, where this is in their best interests, of at least five years with a route to settlement.

Across the UK, independent guardianship provides a safeguard that is distinct from the responsibilities of social workers, immigration authorities and other professionals involved in a child's life. The expansion of ICTGs across England and Wales is an important step towards ending geographical inequality in access to that support. However, the different models across the four nations continue to provide children with substantially different entitlements depending on where they live. National coverage must therefore be accompanied by sufficient resources, access for age-disputed children, meaningful direct relationships with Guardians where needed, effective involvement in NRM and other decisions affecting children, and independent oversight of the quality of the services provided.

The Home Office must ensure that the national expansion of the Independent Child Trafficking Guardian service across England and Wales provides all unaccompanied and trafficked children with a direct and independent guardian, with sufficient resources to maintain meaningful relationships with children and effectively advocate for their best interests.

The Home Office must ensure that all potential child victims whose age is disputed can access Independent Child Trafficking Guardian support until their age has been determined through an appropriate age assessment, including children initially treated as adults by the Home Office.

The Home Office must ensure that Independent Guardians across the UK are promptly informed of and able to contribute to NRM decisions affecting children they support, with effective communication between the Single Competent Authority, First Responders, local authorities and Guardian services.

The Northern Ireland Executive must ensure that Northern Ireland's Independent Guardian Service is sufficiently resourced to meet demand and eliminate waiting lists, so that eligible children have timely access to the independent support and advocacy provided for in legislation.

The Scottish Government must provide Guardianship Scotland with sufficient long-term resources to deliver its statutory functions and develop its capacity to identify and share intelligence on emerging trafficking patterns, routes and forms of exploitation across Scotland.

## Immigration and asylum

Immigration status remains a significant protection issue for child victims of trafficking who do not otherwise have a secure right to remain in the UK. A positive Conclusive Grounds decision confirming that a child is a victim of trafficking does not itself provide immigration status or a route to settlement. For children approaching adulthood, insecure or short-term status can undermine their recovery, stability and ability to plan for education, accommodation and the transition from children's services.

The Victims of Human Trafficking or Slavery (VTS) route provides temporary permission to stay for confirmed victims who do not otherwise have immigration status in the UK.<sup>118</sup> Under the current framework, the Home Office must consider whether leave is necessary to assist recovery from physical or psychological harm arising from exploitation, enable the victim to seek compensation, or enable their cooperation with a public authority in an investigation or criminal proceedings relating to their exploitation.<sup>119</sup> Children are subject to the same statutory conditions as adults, despite the distinct requirements of Article 14(2) of the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT). This requires residence permits for child victims, where legally necessary, to be issued in accordance with their best interests and, where appropriate, renewed on the same conditions. The Convention's Explanatory Report makes clear that children's best interests take precedence over the grounds governing residence permits for adults.<sup>120</sup> The VTS framework contains no equivalent child-specific entitlement.

The Immigration and Asylum Bill would further restrict access to trafficking-specific immigration leave. The clause would amend section 65 of the Nationality and Borders Act 2022 by removing the duty to grant leave where this is necessary to assist a confirmed victim's recovery from physical or psychological harm caused by their exploitation. If enacted in its current form, recovery would cease to be an independent statutory basis for granting VTS leave, leaving compensation and cooperation with investigations or criminal proceedings as the remaining statutory grounds.

For children, this would further widen the gap between domestic legislation and the requirements of ECAT. A child's need for recovery and stability is independent of whether a criminal investigation takes place, whether the authorities require their cooperation or whether they pursue compensation. Children may be unable or unwilling to participate in proceedings, while investigations may never commence or may end for reasons entirely outside their control. The clause does not replace the recovery ground with a child-specific best-interests test or otherwise establish an entitlement to leave where remaining in the UK is necessary in a child's best interests.

These changes must also be considered alongside the Bill's other modern slavery provisions discussed in [Chapter 2](#). In particular, the proposed public order disqualification provisions would exempt only children with a right of abode or existing leave to remain other than VTS. Children without such status would remain at risk of disqualification and the associated loss of access to trafficking-specific protections, including consideration for VTS leave. This would create different levels of protection for child victims depending on their immigration status.

<sup>118</sup> Home Office. (2026). [Temporary Permission to Stay: considerations for Victims of Human Trafficking or Slavery. Version 11.0.](#)

<sup>119</sup> [Nationality and Borders Act 2022, section 65.](#)

<sup>120</sup> Council of Europe. (2005). [Convention on Action against Trafficking in Human Beings, Article 14\(2\)](#); Council of Europe. (2005). [Explanatory Report to the Council of Europe Convention on Action against Trafficking in Human Beings, paragraph 186.](#)

There remains a significant gap in the available data on trafficking-specific immigration leave for children. Although figures on grants of VTS leave to children were specifically requested for this report, the Home Office stated that it was unable to provide them. The latest available evidence remains the findings of Road to Nowhere, which found that only a very small proportion of confirmed child victims who required immigration leave were granted VTS.<sup>121</sup> Without updated figures, it is not possible to assess whether access to trafficking-specific leave has improved or how many confirmed child victims continue to depend on other immigration routes to secure their status.

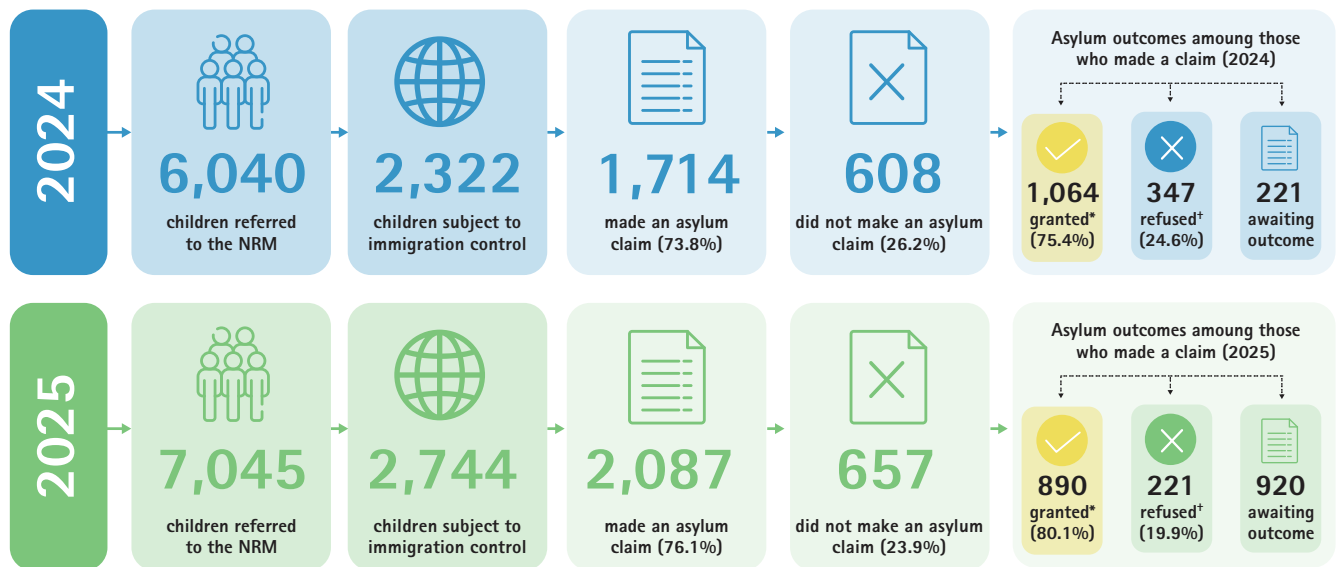
New Home Office data obtained for this report provides further information on the immigration position of children referred into the NRM. Between January 2024 and June 2026, 6,322 children who were under 18 at the point of referral and subject to immigration control were referred into the NRM. A positive trafficking decision does not determine a child's immigration outcome. Of the 2,322 children subject to immigration control who were referred into the NRM in 2024, 1,020 (43.9%) had received a positive Conclusive Grounds decision by 1 July 2026. Of the 2,744 children referred in 2025, 1,285 (46.8%) had received a positive Conclusive Grounds decision by the same date. These figures reflect the position at the date of extraction and will include children whose NRM cases were still awaiting a Conclusive Grounds decision.

Three quarters (4,757; 75.2%) had made an asylum claim. This proportion remained broadly consistent across the two complete years covered by the data: 1,714 of 2,322 children referred in 2024 (73.8%) and 2,087 of 2,744 in 2025 (76.1%). For many foreign-national children in the NRM, trafficking identification therefore takes place alongside a separate asylum process.

Among children who had claimed asylum, the majority of those whose claims had received a grant or refusal were granted protection. For children referred into the NRM in 2024, 1,064 had received a grant of asylum, humanitarian protection or other leave and 347 had been refused, equivalent to a grant rate of 75.4% and refusal rate of 24.6% among claims with a recorded grant or refusal. For the 2025 cohort, 890 had received a grant and 221 had been refused, giving a grant rate of 80.1% and refusal rate of 19.9% among decided claims. These rates are not conclusive, 221 claims from the 2024 cohort and 920 from the 2025 cohort were still awaiting an outcome on 1 July 2026. The large number of outstanding claims, particularly among children referred in 2025, means that the eventual grant and refusal rates for these cohorts may differ substantially.

<sup>121</sup> Helen Bamber Foundation, ATLEU and ECPAT UK. (2025). [Road to Nowhere: The impact of insecure immigration status on survivors of trafficking.](#)

Figure 4: Asylum claims and outcomes among children subject to immigration control referred into the NRM, 2024 – 2025



Notes: Granted combines Grant Asylum, Grant Humanitarian Protection (HP) and Grant Other Leave. Refused combines Refused – No Right of Appeal (No RoA), Refused – Right of Appeal (RoA) and Refused – Third Country Unit (TCU). Grant and refusal rates are calculated among asylum claims with a recorded grant or refusal. Claims awaiting an outcome, suspended or withdrawn are excluded from the calculation.

The large number of outstanding claims, particularly among children referred in 2025 means these are not final grant or refusal rates for the cohorts. Data table can be found in [Annex 1](#).

Child victims of trafficking should not have to rely on the asylum system to secure their immigration status as the main option. The availability of safeguarding support and alternative immigration routes cannot substitute for trafficking-specific leave determined by a child's best interests, particularly where access to asylum or other forms of leave is uncertain and the legislative proposals will leave confirmed child victims without secure immigration status. For those who do rely on the asylum system to secure their immigration status, there is also uncertainty about the longer-term protection that a successful asylum claim will provide. Under the Government's *Restoring Order and Control* reforms, refugee protection is moving towards a 'Core Protection' model, under which initial leave

is reduced to 30 months and the route to settlement substantially extended.<sup>122</sup> Unaccompanied children seeking asylum are currently excluded from the 30-month leave provisions and continue to receive five years' leave where they are granted protection, including where they turn 18 before a decision is made. However, this is an interim position while the Government considers the appropriate long-term policy for this group.<sup>123</sup> The future position for unaccompanied children granted protection therefore remains unresolved. This uncertainty is particularly significant for child victims of trafficking, for whom secure status and the ability to plan beyond childhood is essential for longer-term recovery and protection from further exploitation.

<sup>122</sup> Home Office. (2025). *Restoring Order and Control: A statement on the government's asylum and returns policy*

<sup>123</sup> Home Office. (2026). *Refugee protection to be reviewed every 30 months*. The Government confirmed that unaccompanied children would continue to receive five years' leave while it considers the appropriate long-term policy for this group.

Recent litigation arising from the UK–France Treaty on the Prevention of Dangerous Journeys has further demonstrated the importance of effective trafficking identification within expedited immigration processes. In *AYA and others v Secretary of State for the Home Department*, the High Court considered the September 2025 amendment to the *Modern Slavery Statutory Guidance* which removed the ability of people facing removal to an ECAT and ECHR signatory state, including France, to request reconsideration of a negative Reasonable Grounds or Conclusive Grounds decision. The Court held that the decision to amend the guidance in this way was unlawful.<sup>124</sup> The litigation included cases in which alleged trafficking had not been fully considered and demonstrated the potentially serious consequences of restricting access to reconsideration where removal decisions are being taken rapidly.

The cases also exposed the interaction between age disputes, trafficking identification and removal. Some of the claimants maintained that they were children despite having been treated as adults for immigration purposes, while also raising trafficking concerns. An incorrect age assessment has far reaching consequences for child victims, it affects the safeguarding framework, trafficking protections and procedures applied to them while removal is being pursued. The litigation reinforces the need for trafficking and age issues to be resolved through lawful and effective procedures before removal takes place.

Recent immigration litigation has also demonstrated how experiences of trafficking during childhood can remain relevant to immigration decisions after a young person reaches adulthood. In *RH v Secretary of State for the Home Department*, the Upper Tribunal considered the deportation of a recognised victim of trafficking who had been subjected to forced criminal exploitation while still a child. The Tribunal found that his childhood experiences, previous exploitation and continuing vulnerabilities contributed to a significant risk of re-trafficking and concluded that his removal to Slovakia would expose him to a real risk of treatment contrary to Article 4 ECHR.<sup>125</sup> The case illustrates the importance of immigration decision-making taking account of the continuing effects of trafficking experienced during childhood, including vulnerability to re-trafficking, rather than treating those protection needs as ending when a child reaches adulthood.

For child victims, immigration status should form part of a longer-term protection and recovery framework, with decisions grounded in the child's rights, needs and best interests rather than dependent on their engagement with criminal proceedings or pursuit of compensation. Secure and durable status is particularly important as children approach adulthood, when changes in care, support and immigration entitlements can increase instability and vulnerability. An approach centred on best interests would provide greater continuity between childhood and adulthood and better reflect the child-specific requirements of ECAT.

The Home Office must introduce a specific route to secure immigration status for confirmed child victims of trafficking where remaining in the UK is in their best interests, granting a minimum of five years' leave with a route to settlement.

The Home Office must ensure that no child or potential child victim of trafficking is removed from the UK while their age, trafficking identification or related protection needs remain unresolved, with effective access to reconsideration and other procedural safeguards.

<sup>124</sup> *AYA and others v Secretary of State for the Home Department* [2026] EWHC 1742 (Admin).

<sup>125</sup> *RH v Secretary of State for the Home Department* (Upper Tribunal (Immigration and Asylum Chamber), UI-2024-005173, 5 September 2025).

## Children's social care

Children's social care has the central role in preventing, identifying and responding to child trafficking and exploitation. Local authorities are responsible for safeguarding all children in their area, including children harmed outside the family home, children in care, unaccompanied children and children whose exploitation may initially present through offending, going missing, homelessness or other indicators of harm. Yet services are operating under sustained financial and workforce pressures, while preventative provision has reduced substantially.

Since 2010/11, local authority spending on early intervention services in England has fallen by more than £2 billion, a reduction of 42%, while spending on residential care reached a record £3 billion in 2024/25. The reductions have been greatest in the most deprived areas, where early intervention spending per child has fallen by more than 50%. More than 1,000 children's centres and 750 youth centres have closed since 2010.<sup>126</sup> For children vulnerable to exploitation, reduced access to early help and trusted community services can mean fewer opportunities to identify emerging risks before exploitation becomes entrenched. Children experiencing exploitation do not always disclose what is happening to them and may instead come to attention through changes in behaviour, school absence, going missing, offending or concerns about relationships with peers and adults.

The Government has begun to reinvest in youth provision through its Young Futures programme. This includes plans for 50 Young Futures Hubs across England by March 2029, bringing together youth services with mental health and wellbeing, education, employment, social care and crime prevention support. The programme forms part of a £70 million investment in local youth

services and has an explicit focus on reaching young people vulnerable to being drawn into crime.<sup>127</sup> The investment is welcome and could provide important opportunities for earlier identification and support for children at risk of criminal and other forms of exploitation. However, its reach remains considerably smaller than the scale of youth and early intervention provision lost over the previous decade.

Significant reform of children's social care in England began under the previous Government's *Stable Homes, Built on Love* strategy and has largely continued under the current Government through *Keeping Children Safe*, *Helping Families Thrive*, the *Children's Social Care National Framework* and the *Children's Wellbeing and Schools Act 2026*.<sup>128</sup> The legislative reforms are discussed in [Chapter 2](#). The Government is seeking to rebalance the system towards earlier intervention through Family Help and to strengthen child protection through new MACPTs. The reforms also place greater emphasis on harm occurring outside the home, which is particularly important for children experiencing trafficking, criminal exploitation and sexual exploitation.

The Family Help model brings together targeted early help and support for children in need under section 17 of the *Children Act 1989*, with a Family Help Lead Practitioner intended to provide greater continuity for children and families. MACPTs will bring together specialist practitioners from safeguarding partners to support child protection decision-making where concerns escalate.<sup>129</sup> These reforms provide an opportunity to improve responses to exploitation, particularly where risks arise outside the family and cannot be addressed solely through interventions with parents. Their effectiveness will depend on practitioners having the expertise and capacity to identify exploitation, understand coercion and control, assess risks beyond the home and intervene without requiring children to demonstrate or disclose exploitation before support is provided.

<sup>126</sup> NSPCC, Action for Children, Barnardo's, National Children's Bureau and The Children's Society. (2026). *Children's services spending reports*.

<sup>127</sup> Department for Culture, Media and Sport. (2026). *Young Futures Hubs and Transformation Programme*.

<sup>128</sup> Department for Education. (2023). *Stable Homes, Built on Love: strategy and consultation*. Department for Education. (2024). *Keeping children safe, helping families thrive*. Department for Education. (2026). *Children's social care national framework*.

<sup>129</sup> Department for Education. (2024). *Keeping children safe, helping families thrive*.

The Department for Education's 2026 consultation on revisions to *Working Together to Safeguard Children* and the Children's Social Care National Framework explicitly considers extra-familial harm and exploitation alongside the development of MACPTs.<sup>130</sup> It also proposes changes to the definition and guidance on CSE. This work follows continuing concerns about inconsistent understanding and application of the existing CSE definition. Definitions shape whether children are recognised as victims of exploitation as well as the safeguarding response they receive. ECPAT UK's *More than Words* research found that inconsistent, misunderstood and overly restrictive definitions can create barriers to identification, particularly where professionals feel they are expected to establish coercion, manipulation or deception before recognising exploitation. The research called for a clear, overarching definition of child exploitation that reflects the overlap between different forms of exploitation and trafficking and does not impose additional thresholds based on how a perpetrator secured a child's compliance.<sup>131</sup> This is particularly relevant to the proposed revised CSE definition, which should not make the identification of exploitation dependent on demonstrating particular 'means' used by the perpetrator. For children, the focus should be on the exploitative abusive act and the harm experienced, recognising that children cannot consent to their own exploitation.

#### Accommodation and care

Safe and stable accommodation is fundamental to protecting children from trafficking and re-trafficking. Placement instability, inappropriate accommodation and moves away from children's communities and support networks can increase vulnerabilities and make effective safeguarding more difficult. The shortage of suitable placements therefore has particular consequences for child victims of exploitation, whose

placements need to respond to risks associated with traffickers, criminal networks, locations, peers and going missing.

The Government is expanding Regional Care Co-operatives (RCCs), which bring local authorities together to plan and commission placements across wider areas. Five additional RCCs were announced in July 2026, alongside the existing pathfinders, meaning that more than 100 local authorities are expected to be participating in a co-operative by the end of 2026.<sup>132</sup>

Better regional planning has the potential to improve access to appropriate placements, including for children with complex safeguarding needs. However, placement sufficiency cannot be measured simply by the number of available beds. For trafficked and exploited children, commissioning must consider whether placements can safely manage exploitation risks, maintain important relationships, provide access to specialist support and education, and avoid placing children in locations where they remain accessible to those exploiting them.

Concerns also remain about children being accommodated outside the regulated care system. The number of children placed in unregistered children's homes increased substantially between 2020/21 and 2023/24, and Ofsted has raised concerns about the quality of such provision.<sup>133</sup> The Children's Wellbeing and Schools Act 2026 strengthens Ofsted's enforcement powers against providers operating unregistered children's homes, while proposed reforms to local authority inspection would place greater scrutiny on councils' use of unregistered provision. These measures are particularly relevant to children at risk of exploitation. Accommodation without appropriate safeguarding, staffing and regulatory oversight can leave already vulnerable children exposed to further harm.

<sup>130</sup> Department for Education. (2026). [Improving help and child protection: revised framework](#).

<sup>131</sup> Durán, L. et al. (2025). [More than Words: How definitions impact on the UK's response to child trafficking and exploitation](#).

<sup>132</sup> Department for Education. (2026). [Regional care co-operatives](#).

<sup>133</sup> Ofsted. (2024). [Unregistered children's homes](#).

The distinction between different forms of local authority support can also have long-term consequences. In 2026, the High Court judgment in *R (FZW) v Bristol City Council* reaffirmed that a local authority cannot avoid its duties under section 20 of the Children Act 1989 by describing accommodation that it is in substance provided under section 20 as support under section 17. The case concerned a young Eritrean woman who became homeless as a child after family arrangements broke down. The Court found that she should have been treated as a looked-after child and was consequently entitled to care-leaver support.<sup>134</sup> The judgment has particular significance for separated and migrant children and homeless 16- and 17-year-olds, including potential victims of trafficking. The statutory route through which a child is supported can determine whether they acquire looked-after status and the associated protections and entitlements that continue beyond their eighteenth birthday.

#### Outdated guidance for trafficked children

While the wider child protection system is undergoing substantial reform, some of the guidance most directly relevant to trafficked children has not kept pace. The *statutory guidance Children who run away or go missing from home or care* was last updated in January 2014.<sup>135</sup> The statutory guidance on *Care of unaccompanied migrant children and child victims of modern slavery* has not been updated since 2017.<sup>136</sup> Most strikingly, the dedicated practice guidance *Safeguarding children who may have been trafficked* dates from 2011.<sup>137</sup>

The 2011 trafficking guidance predates the Modern Slavery Act 2015, the current NRM framework and Independent Child Trafficking Guardian service, as well as major developments in understanding child criminal exploitation, online exploitation and extra-familial harm. The 2017 guidance for unaccompanied and trafficked children predates substantial changes to the National Transfer Scheme, age assessment and the immigration and modern slavery systems. The missing children guidance was developed at a time when policy attention was predominantly focused on CSE and still refers to safeguarding structures that have since been replaced. Yet going missing remains a key indicator that a child may be experiencing exploitation and can also expose children to further trafficking and harm.

This creates a considerable gap between the Government's current reform programme and the specialist framework available to practitioners responsible for trafficked children.

Updating *Working Together*, the Children's Social Care National Framework and guidance on CSE and extra-familial harm is welcome, but these reforms should be accompanied by an urgent review of the specialist guidance on trafficking, unaccompanied children and missing children. Practitioners need a coherent framework that reflects contemporary forms of exploitation, current legislation and the NRM, age disputes, criminal exploitation, immigration and asylum processes, ICTGs and the particular risks faced by children who go missing from care.

<sup>134</sup> *R (FZW) v Bristol City Council* [2026] EWHC 1956 (Admin).

<sup>135</sup> Department for Education. (2014). *Children who run away or go missing from home or care: statutory guidance*.

<sup>136</sup> Department for Education. (2017). *Care of unaccompanied migrant children and child victims of modern slavery: statutory guidance for local authorities*.

<sup>137</sup> Department for Education and Home Office. (2011). *Safeguarding children who may have been trafficked: practice guidance*.

Children's social care reform provides an important opportunity to move towards earlier and more coordinated responses to exploitation. This will require more than structural change. Family Help and MACPTs must have the expertise and resources to identify and respond to trafficking and exploitation; commissioning

reforms must deliver safe and appropriate placements; and children must receive the statutory support to which they are entitled regardless of nationality or immigration status. Specialist guidance must also be brought into line with the system practitioners are now expected to operate.

The Department for Education must ensure that children's social care reform is backed by sustained investment in early intervention and youth services, so that local authorities have the capacity to identify and respond to trafficking and exploitation before harm becomes entrenched.

The Department for Education must ensure that Family Help and Multi-Agency Child Protection Teams have the specialist expertise, training and resources to identify and respond to all forms of child trafficking and exploitation.

The Department for Education must adopt a clear and consistent approach to defining child exploitation across statutory safeguarding guidance, recognising that children cannot consent to their own exploitation and ensuring that identification does not depend on demonstrating coercion, manipulation, deception or other means used by a perpetrator.

The Department for Education must ensure that reforms to the commissioning of children's social care deliver sufficient safe, regulated and appropriate placements for trafficked and exploited children, with placement decisions reflecting risks from traffickers, going missing and re-exploitation alongside children's need for continuity of education, relationships and specialist support.

The Department for Education and Home Office must urgently update statutory and practice guidance on trafficked and unaccompanied children and children who go missing, to reflect current legislation, the NRM and ICTG service, contemporary forms of exploitation, extra-familial harm, age disputes and changes to the immigration and asylum system.

### Criminalisation of child victims

Children who have been trafficked may come into contact with the criminal justice system for offences committed due to the exploitation. This is not limited to children whose identified form of exploitation is CCE. Children trafficked for domestic servitude, sexual exploitation, labour exploitation or other purposes may also commit offences connected to their trafficking, including immigration and document offences, or offences committed under the direction or control of their exploiters. The principle that trafficked children should not be punished for unlawful activity they were compelled or otherwise required to undertake as a consequence of their trafficking applies across all forms of exploitation.

The increasing prevalence of CCE means that identified children exploited for criminal activity are likely to account for the majority of trafficked children at risk of criminalisation. CCE can involve children being used to transport or sell drugs, move money, commit theft or fraud, conceal prohibited items or undertake violence and other criminal activity for the benefit of others. 'County lines' remains one of its most recognised manifestations, but CCE is considerably broader and continues to evolve, including through recruitment and control online.<sup>138</sup> The Crime and Policing Act 2026 introduced a standalone offence of CCE considered in [Chapter 2](#). However, greater recognition of CCE in UK law does not in itself ensure that trafficked children are protected from prosecution for offending arising from their exploitation.

Recent evidence continues to identify failures at the earliest stages of identification. A 2025 inspection of Cleveland Police found a lack of referrals to the

NRM in cases where children had, or appeared to have, been criminally exploited, alongside failures to initiate strategy discussions when required.<sup>139</sup> More recent research into policing responses to children's exploitation in drug markets similarly identifies continuing difficulties in translating recognition of vulnerability and exploitation into consistent treatment of children as victims.<sup>140</sup> Where trafficking is not identified when a child first comes into contact with police or other agencies, protections intended to prevent their criminalisation may never be engaged.

The NRM itself cannot substitute for an effective safeguarding and criminal justice response, it is the first step but must be followed by effective protection responses. Home Office research published in 2026 found considerable frustration among safeguarding professionals about how the NRM operated in cases of county lines and serious youth violence. Participants described uncertainty about its purpose and highlighted cases in which a positive NRM decision had been made but children remained exposed to exploitation and continued criminal activity. The research concluded that an NRM referral should trigger a dual response: safeguarding the child and investigating those responsible for their exploitation. It also identified inconsistent treatment between different forms of exploitation, with children experiencing CSE more readily receiving a safeguarding response while children experiencing CCE and county lines could continue to encounter criminalisation and enforcement.<sup>141</sup> Although the fieldwork for this study predates its 2026 publication, more recent evidence indicates that difficulties in translating identification through the NRM into protection including protection from criminalisation, persist.

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<sup>138</sup> Home Office and Ministry of Justice. (2026). [Crime and Policing Act 2026: child criminal exploitation, cuckooing \(home takeover\) and internal concealment factsheet](#).

<sup>139</sup> HMICFRS. (2025). [Cleveland: National child protection inspection](#).

<sup>140</sup> Youth Endowment Fund. (2026). [Policing's Response to Children's Exploitation in Drug Markets: Exploratory Study Report](#).

<sup>141</sup> McManus, M. et al. (2026). [Deep dive exploration of safeguarding partnership responses to county lines and serious youth violence](#).

### Section 45 and the non-punishment principle

The protection of trafficked children from punishment for offences arising from their exploitation is not specific to CCE. Article 26 of the ECAT establishes the non-punishment principle for victims involved in unlawful activities to the extent that they have been compelled to do as a consequence of the trafficking. In England and Wales, section 45 of the Modern Slavery Act 2015 provides a statutory defence for victims of slavery and trafficking who commit certain offences as a consequence of their exploitation. For children, the defence applies where the offence was committed as a direct consequence of being, or having been, a victim of slavery or relevant exploitation and a reasonable person in the same situation, with the child's relevant characteristics would have committed the act. Unlike the adult defence, there is no requirement to demonstrate compulsion.<sup>142</sup> The statutory defence is unavailable for offences listed in Schedule 4 of the Act, including the common law offences of murder and manslaughter.<sup>143</sup> However, children accused of these offences must still have their circumstances of exploitation considered in accordance with the non-punishment principle and Crown Prosecution Service guidance, including when determining whether prosecution is in the public interest.<sup>144</sup>

There remains very limited evidence about how consistently this protection operates in practice. An evidence review of section 45 identified significant gaps in data on use of the defence, alongside inconsistent understanding among criminal justice professionals and concerns about the offences excluded through Schedule 4.<sup>145</sup> A significant barrier

to understanding the scale of this issue is the absence of publicly available data on the use of the Section 45 defence or the wider non-punishment principle in cases involving children. The CPS has advised the IASC that it does not currently hold such data, although it is actively exploring ways to improve the collection of data and evidence relating to modern slavery casework

The Group of Experts on Action against Trafficking in Human Beings (GRETA)'s fourth evaluation of the UK in 2026 expressed continuing concern that trafficking victims were being prosecuted and convicted for offences committed as part of their exploitation and noted the absence of data capable of demonstrating how effectively the non-punishment principle is being applied. GRETA again called on the UK Government to remove the 'reasonable person' test from the section 45 defence for children, to ensure that coercion or other 'means' are not taken into account in applying the child defence, and to facilitate the removal of convictions where victims have been wrongly convicted for offences committed in the context of trafficking.<sup>146</sup>

Case law has demonstrated that the distinct test applying to children has not always been properly understood. In *ADG and another v R*, the Court of Appeal quashed the convictions of two children for conspiracy to supply Class A drugs after the jury had incorrectly been directed that they needed to establish compulsion. The Court confirmed that compulsion is not an element of the child defence and that requiring it imposed a more onerous test than Parliament had provided.<sup>147</sup>

<sup>142</sup> Council of Europe Convention on Action against Trafficking in Human Beings (adopted 16 May 2005, entered into force 1 February 2008) CETS No 197, art 26; Modern Slavery Act 2015, s 45(4).

<sup>143</sup> Modern Slavery Act 2015, Schedule 4.

<sup>144</sup> Crown Prosecution Service. Modern Slavery and Human Trafficking: Offences and Defences, Including the Section 45 Defence

<sup>145</sup> Heys, A. and Jovanovic, M. (2022). Section 45 of the Modern Slavery Act: evidence review.

<sup>146</sup> Group of Experts on Action against Trafficking in Human Beings (GRETA). (2026). Evaluation Report: United Kingdom, Fourth Evaluation Round.

<sup>147</sup> *ADG and another v R* [2023] EWCA Crim 1309.

Section 45 is not the entirety of the protection against criminalisation. Where the statutory defence is unavailable, including because an offence appears in Schedule 4, prosecutors must still consider whether prosecution is appropriate under the CPS four-stage approach and the non-punishment principle. In *R (AB) v Uxbridge Youth Court*, a 14-year-old who had been charged with robbery and battery subsequently received a positive Conclusive Grounds decision. The prosecution initially continued, but judicial review proceedings established that the CPS had incorrectly applied the four-stage test by applying the public interest approach for adults rather than children. The Director of Public Prosecutions conceded the error and agreed to reconsider the case.<sup>148</sup> The case demonstrates the importance of protections outside section 45, particularly for children accused of offences excluded from the statutory defence.

Recent cases also demonstrate the potentially long-term consequences where trafficking is not identified at the time of offending. In *R v Kwiatkowska*, the Court of Appeal considered a series of convictions in light of subsequent evidence of trafficking involving sexual and criminal exploitation beginning in childhood. The Court allowed appeals against her 2011 and 2015 convictions while dismissing appeals relating to later convictions.<sup>149</sup> In September 2026, the Criminal Cases Review Commission (CCRC) referred the 2010 drug convictions of a man back to the Crown Court. He was 17 when convicted of possession of Class A drugs with intent to supply. More than a decade later, the NRM concluded that he had been recruited and transported by older gang members for criminal exploitation. The CCRC concluded that there was a real possibility that the Crown Court would find that his prosecution amounted to an abuse of process.<sup>150</sup>

These cases illustrate the consequences of failures to identify trafficking at the earliest opportunity. A child may acquire a criminal record before their exploitation is recognised, with the burden then falling on them years later to challenge convictions arising from conduct connected to that exploitation. The risk is particularly pronounced for children exploited for criminality because offending is itself the purpose or product of the exploitation, but the same principles apply wherever offending is connected to a child's trafficking. A child's offence should not obscure the circumstances in which it was committed or prevent agencies from considering whether they are a victim of trafficking.

#### Youth justice reform

The Government's 2026 Youth Justice White Paper, *Cutting Youth Crime. Changing Young Lives*, contains a number of developments that could strengthen protection from unnecessary criminalisation. It explicitly recognises the over-criminalisation of children in care and care leavers and commits to publishing a more ambitious refreshed National Protocol on Reducing the Unnecessary Criminalisation of Looked-after Children and Care Leavers.<sup>151</sup> The existing protocol already requires agencies to understand the needs of children who have been trafficked, including foreign-national children, and to recognise circumstances in which traffickers may have coerced children into criminal activity.<sup>152</sup> A strengthened protocol should ensure that trafficking and exploitation are systematically considered before decisions to arrest, charge or prosecute children are made.

<sup>148</sup> *R (AB) v Uxbridge Youth Court* [2023] EWHC 2951 (Admin).

<sup>149</sup> *R v Kwiatkowska* [2026] EWCA Crim 45.

<sup>150</sup> Criminal Cases Review Commission. (2026). Man exploited and trafficked by gangs as a child has convictions referred to Crown Court.

<sup>151</sup> Ministry of Justice. (2026). Cutting Youth Crime. Changing Young Lives: The youth justice system reform and delivery plan.

<sup>152</sup> Department for Education, Home Office and Ministry of Justice. (2018). The national protocol on reducing unnecessary criminalisation of looked-after children and care leavers.

The White Paper also reflects a wider shift towards recognising children experiencing CCE as victims and acknowledges structural disparities affecting children in the youth justice system, including those associated with care experience, poverty and race. Its emphasis on multi-agency working, information sharing and earlier intervention could support better identification of exploitation and access to safeguarding, ICTGs and the NRM. However, CCE should not become synonymous with county lines, nor should efforts to prevent the criminalisation of trafficked children be confined to children formally identified as victims of CCE. Children can be trafficked for multiple and overlapping purposes, and offending may occur at different points during their exploitation.

There is also a concerning tension within the White Paper in relation to foreign-national children. It states that foreign nationals who commit serious offences should be removed from the UK at the earliest opportunity and explicitly states that children are not exempt, with the Government intending to pursue the removal of foreign-national children who commit serious sexual or violent offences where it considers it safe to do so.<sup>153</sup> The White Paper does not explain in this section how trafficking, exploitation, NRM identification or modern slavery protections will be taken into account where the offence itself is connected to a child's exploitation.

Children cannot consent to their own exploitation, and trafficking can result in children committing serious offences, particularly where criminal exploitation is involved. A child may therefore simultaneously be a victim of trafficking and accused or convicted of a serious offence. The absence of a clear explanation

of how the proposed approach to foreign-national children will interact with the NRM, section 45, and the wider non-punishment principle raises concerns about whether trafficked children with insecure immigration status will receive the same protection from criminalisation as other children. This is particularly relevant in the context of wider changes to modern slavery protections and immigration law considered in [Chapter 2](#).

The explicit recognition of CCE, the new offence of CCE targeting exploiters and the commitment to reduce unnecessary criminalisation are important developments. Yet inspection findings, recent research, case law and GRETA's latest evaluation continue to show that trafficked children can move through safeguarding and criminal justice systems without their exploitation being identified or properly reflected in decisions about prosecution. Effective implementation of the non-punishment principle requires trafficking to be considered from the first contact with police through to charging decisions, regardless of the form of exploitation a child has experienced. It also requires consistent NRM referrals, specialist legal representation, correct application of child-specific protections and a criminal justice response focused on identifying and prosecuting those responsible for exploiting children.

The UK Government must ensure that trafficking and exploitation are identified and considered from a child's first contact with the criminal justice system and throughout decisions to arrest, charge and prosecute, so that children are protected from punishment for offences committed as a consequence of their exploitation.

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<sup>153</sup> Ministry of Justice. (2026). [Cutting Youth Crime. Changing Young Lives: The youth justice system reform and delivery plan.](#)

The UK Government must amend section 45 of the Modern Slavery Act 2015 to remove the 'reasonable person' test for children in line with GRETA's recommendations.

The Home Office and Ministry of Justice must collect and routinely publish disaggregated data on the application of section 45 and the wider non-punishment principle to children, including the characteristics of defendants, offences involved and outcomes, to enable scrutiny of whether trafficked children are being effectively protected from criminalisation.

The UK Government must ensure that the refreshed National Protocol on Reducing the Unnecessary Criminalisation of Looked-after Children and Care Leavers requires trafficking and exploitation to be considered before criminal justice action is taken and applies robust protections to children whose offending may be connected to exploitation.

The Crown Prosecution Service must ensure that prosecutors consistently apply child-specific protections and the non-punishment principle in all cases where trafficking or exploitation may be relevant, including where the offence is excluded from the section 45 statutory defence.

## Transition to adulthood

Turning 18 can represent a significant cliff edge for young people who have experienced trafficking and exploitation. The risks and effects of exploitation do not end at adulthood, but the legal frameworks, services and professionals responsible for supporting young people change substantially. Research by the Alliance for Youth Justice (AYJ) found that young adults who were criminally exploited as children remain at risk of exploitation while experiencing a sharp reduction in support and protection. The report also identified a significant shift in how young people may be perceived at 18, from vulnerable children requiring safeguarding to adults considered responsible for their behaviour, despite continuing exploitation, trauma and developmental vulnerability.<sup>154</sup>

The transition between child and adult safeguarding systems is particularly significant. Child safeguarding duties apply broadly to children at risk of significant harm, while adult safeguarding operates under different statutory thresholds. AYJ found that young adults affected by exploitation may not meet adult social care thresholds despite continuing to face serious risks. The report identified growing interest in Transitional Safeguarding approaches, which seek to provide more flexible and developmentally appropriate responses into young adulthood, but found that implementation remains inconsistent and is constrained by different legislative frameworks, thresholds and a lack of a national mandate.<sup>155</sup>

For children who have been looked after, leaving-care duties can provide important continuity. Local authorities have responsibilities to prepare eligible young people for adulthood and provide continuing

support through personal advisers and pathway planning. However, leaving-care entitlements alone do not necessarily provide the specialist response required following trafficking. AYJ found that care-experienced young people affected by criminal exploitation can continue to face gaps in housing and other support, particularly where they have been moved out of area, while voluntary-sector services may also end at 18 because of age restrictions or funding arrangements.<sup>156</sup> Not every child identified as a victim of trafficking will have the care history necessary to qualify for leaving-care entitlements, creating further differences in the protection available to young people with similar experiences of exploitation.

The Children's Wellbeing and Schools Act 2026 introduces measures intended to strengthen the transition from care to adulthood in England. The Act creates a new statutory Staying Close duty for eligible former relevant children under 25 where their welfare requires it, including support to find and maintain suitable accommodation and access services and opportunities.<sup>157</sup> These developments reflect wider recognition that young people leaving care may continue to need sustained relationships and support beyond 18. For young victims of trafficking, this continuity is particularly important where risks associated with exploitation remain unresolved and where their recovery from abuse is ongoing.

Transition within the trafficking identification and support system presents a separate challenge. Children do not consent to their own referral into the NRM and cannot withdraw themselves from it, but the NRM is consent-based for adults.<sup>158</sup> In February 2026, the Home Office introduced a revised process for children approaching 18 whose Conclusive Grounds decision is

<sup>154</sup> Alliance for Youth Justice. (2025). [From exploited to exploiter? Preventing the unjust criminalisation of victims of child criminal exploitation in the transition to adulthood.](#)

<sup>155</sup> Children's Wellbeing and Schools Act 2026, s 7.

<sup>156</sup> Alliance for Youth Justice. (2025). [From exploited to exploiter? Preventing the unjust criminalisation of victims of child criminal exploitation in the transition to adulthood.](#)

<sup>157</sup> Children's Wellbeing and Schools Act 2026, s 7.

<sup>158</sup> Home Office. (2026). [Modern Slavery: Statutory Guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and Non-Statutory Guidance for Scotland and Northern Ireland.](#) Version 4.8, paras 9.48–9.61.

unlikely to be made before their eighteenth birthday, referred to as 'age change cases'. This new process requires that the SCA should notify the relevant First Responder and professionals supporting the child, including the ICTG service where applicable, and provide information to support trauma-informed discussions with the young person before they turn 18. Once the young person turns 18, they must decide whether to consent to remain in the NRM or withdraw. They can provide this decision in writing directly to the SCA or verbally following an informed discussion with a professional from a First Responder Organisation, who must ensure that the young person understands the implications of their decision, document it and return the relevant form to the SCA. If the young person does not provide a decision, their NRM case will be suspended, although it can subsequently be reopened with their informed consent. Young people who are still awaiting a Conclusive Grounds decision can also consent to adult Modern Slavery Victim Care Contract support when they consent to remain in the NRM.<sup>159</sup> The Home Office has published accompanying information for young people approaching 18 explaining the transition process and the support potentially available as an adult.<sup>160</sup>

In England and Wales, ICTG support also ends at 18. This can mean the loss of an established and trusted specialist relationship at a point when a young person may still be waiting for a Conclusive Grounds or asylum decision, resolving an age dispute, engaging with criminal proceedings, moving between accommodation or education settings, or remaining at risk from traffickers. ECPAT UK and the IASC's position is that ICTG support should extend beyond the eighteenth birthday, in line with leaving-care

services, where a young person continues to need specialist trafficking support. The need for continuity is particularly clear where the issues for which the guardian has been advocating remain unresolved when the young person turns 18.

For young people who have experienced criminal exploitation, the consequences of the transition can also include an increased risk of criminalisation. AYJ found that older adolescents and young adults may increasingly be viewed as perpetrators rather than victims, including where exploitation that began in childhood continues after 18. In some cases, young people who have been exploited over a prolonged period may themselves become involved in recruiting or directing younger children, whether through coercion, as part of their continuing exploitation or as a strategy to reduce their own exposure to harm. This complex victim-perpetrator dynamic can be poorly recognised, with previous evidence of victimisation disregarded once a young adult is perceived to be involved in exploiting others.

Transition planning should therefore begin well before a young person turns 18 and to be based on their continuing needs and risks rather than an abrupt change in response at a fixed age. Social care, specialist trafficking support, immigration and legal advice, accommodation, education, health and criminal justice agencies may all need to be involved. A young person's eighteenth birthday should not result in trafficking-related vulnerabilities being reassessed solely through adult thresholds or the loss of specialist relationships that remain necessary for their protection and recovery.

<sup>159</sup> Ibid.

<sup>160</sup> Home Office. (2026). Information pack for young people in the NRM turning 18.

### Spotlight on practice: Transition Specialists

*The development of Child Trafficking Transition Specialists within the Independent Modern Slavery Advocate (IMSA®) pilot provides an example of specialist practice responding to some of the gaps young survivors currently experience as they move into adulthood.<sup>161</sup> It does not replace the need for continuity within statutory provision, including extending ICTG support where it continues to be required, but provides useful learning about the type of independent, relationship-based advocacy young survivors may need during this period.*

*First launched in 2021, the accredited IMSA® role is now being developed through a national pilot involving organisations across the four nations of the UK. Snowdrop Project has played a leading role alongside Hope for Justice, Survivors of Human Trafficking in Scotland (SOHTIS), survivors of modern slavery and the Bakhita Centre for Research on Slavery, Exploitation and Abuse at St Mary's University. Between September 2025 and May 2026, the pilot supported more than 200 people, including direct work with 32 young people.*

*Within the pilot, specialist Child Trafficking Transition IMSAs® work with young survivors aged 16 to 25. In areas where ICTGs operate, their work with young people begins at 18. The specialists can provide advocacy across immigration and age disputes, housing, healthcare and other services, helping young people navigate systems and entitlements that can change substantially as they enter adulthood.*

### Adam's story

*Adam\* was 16 when he first came into contact with Snowdrop Project. He had been groomed and trafficked to the UK and exploited to work in cannabis cultivation, where he was confined and physically restrained by his traffickers. When police found him, he was arrested alongside those exploiting him. His age was disputed and, without representation for his asylum claim, he was initially treated as an adult rather than as a child who may have been trafficked.*

*When Snowdrop first began working with Adam, he was frightened of his traffickers and barely spoke. Through specialist IMSA® advocacy, he was supported to have his trafficking experiences recognised, obtain legal representation for his asylum claim and resolve the dispute over his age.*

*Adam is now 18. He is learning English, attending college and beginning to think about employment and his future. His experience illustrates how trafficking, criminalisation, age disputes and immigration status can intersect, and the importance of sustained specialist advocacy that does not disappear simply because a young person reaches adulthood.*

*\*Name changed to protect the young person's identity.*

The Home Office must extend Independent Child Trafficking Guardian support beyond the age of 18, in line with leaving-care services, where young people continue to need specialist trafficking support, advocacy and continuity of an established relationship.

Local authorities must ensure that transition planning for young victims of trafficking begins well before their eighteenth birthday and coordinates social care, accommodation, specialist trafficking support, immigration and legal advice, education, health and criminal justice services according to each young person's continuing needs and risks.

<sup>161</sup> Hope for Justice. (2025). Avoiding the cliff edge: working with young survivors of modern slavery as they turn 18.



## CHAPTER 5: PROSECUTION

Holding perpetrators of child trafficking and exploitation to account is an essential part of protecting children and preventing further harm. The Modern Slavery Act 2015 provides a framework for prosecuting slavery and trafficking offences, with a maximum sentence of life imprisonment for the principal offences. Yet there is limited evidence that those responsible for exploiting children are consistently identified, investigated and prosecuted.

The gap between victim identification and criminal justice outcomes is difficult to assess. There is no routinely published dataset showing how many investigations, prosecutions and convictions involve child victims of trafficking and exploitation. This is not a new concern. In its inquiry into human trafficking, the House of Commons Home Affairs Committee concluded that the focus on identifying perpetrators of child trafficking was 'woefully inadequate' compared with the number of children being exploited.<sup>162</sup> While recognition of CCE and specialist knowledge within policing and prosecution have developed since then, substantial barriers continue to affect the investigation and prosecution of child trafficking and exploitation.

### Barriers to prosecuting child trafficking and exploitation

Effective prosecution depends first on children being recognised as victims. *More Than Words* found continuing inconsistency in how child trafficking and exploitation are defined and understood across safeguarding and criminal justice systems. Restrictive or inconsistent interpretations can mean that children are not identified as victims, affecting safeguarding decisions and opportunities to investigate those responsible for their exploitation.<sup>163</sup>

Investigations also depend heavily on how criminal justice agencies engage with victims. Research on barriers to prosecutions under the Modern Slavery Act 2015 found that fear of perpetrators, mistrust of authorities, stigma, shame and lengthy criminal justice processes can all affect survivors' willingness or ability to participate. Trauma may also affect memory, disclosure and communication. These issues can be particularly acute for children, whose accounts of exploitation may emerge gradually and whose relationships with those exploiting them may involve grooming, dependency, fear or perceived loyalty.<sup>164</sup>

Trafficking investigations can themselves be complex and resource intensive. Cases may involve multiple victims or perpetrators, organised criminal networks, digital evidence, movement across police force areas or international borders, and offending that takes place over long periods. Research examining police investigations in England has highlighted the challenge of simultaneously safeguarding victims and building complex criminal cases, while delays can further affect victim engagement.<sup>165</sup> These pressures sit within wider concerns about specialist law enforcement capacity. The Independent Anti-Slavery Commissioner has called for sustained specialist capability to investigate modern slavery and trafficking, alongside greater use of intelligence and evidence to identify and disrupt offenders.<sup>166</sup>

Investigations can also rely heavily on victims to provide evidence against those who have exploited them. Victim accounts will often remain important, but an investigation that depends predominantly on a child's disclosure and continued participation can place considerable pressure on the child and leave a case vulnerable if they disengage. Research on modern slavery prosecutions has therefore emphasised the importance of evidence-led investigations that make greater use of digital, financial, intelligence and other corroborating evidence.<sup>167</sup>

<sup>162</sup> House of Commons Home Affairs Committee. (2023). *Human Trafficking*. First Report of Session 2023–24, HC 124.

<sup>163</sup> Durán, L. et al. (2025). *More Than Words: How Definitions Impact on the UK's Response to Child Trafficking and Exploitation*.

<sup>164</sup> Heys, A. (2025). *Barriers to Prosecutions and Convictions under the Modern Slavery Act 2015*. Modern Slavery and Human Rights Policy and Evidence Centre.

<sup>165</sup> Pajon, L. and Walsh, D. (2025). *Investigating organised human trafficking crimes: case studies of police investigations in England*. *Police Practice and Research*, 26(2), pp. 136–152.

<sup>166</sup> Independent Anti-Slavery Commissioner. (2025). *Annual Report 2024–25*.

<sup>167</sup> Heys, A. (2025). *Barriers to Prosecutions and Convictions under the Modern Slavery Act 2015*. Modern Slavery and Human Rights Policy and Evidence Centre.

## Data on prosecutions

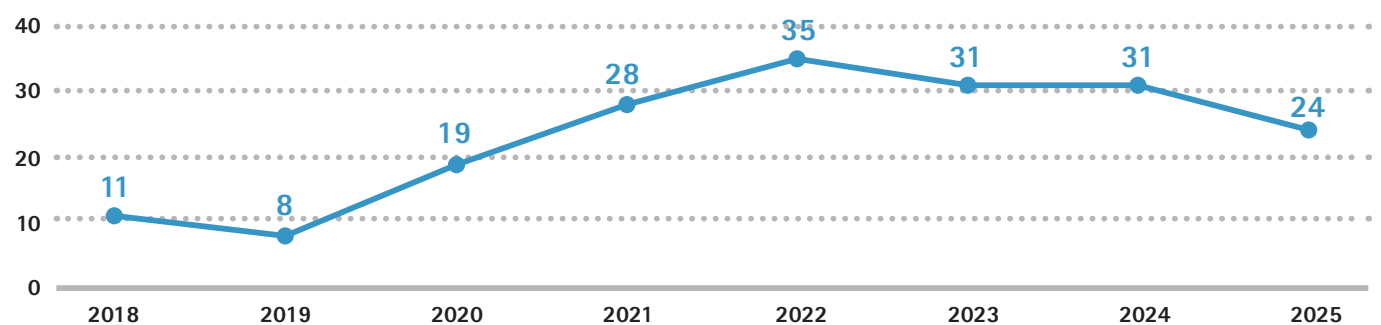
Assessing whether perpetrators are being held to account remains difficult because criminal justice data do not provide a clear picture of cases involving child victims. The CPS does not routinely publish a breakdown of modern slavery prosecutions and convictions by the age of the victim. Published NRM statistics can therefore show how many children are identified as potential victims, but cannot be readily linked to investigations,

charges, prosecutions or convictions arising from their exploitation.

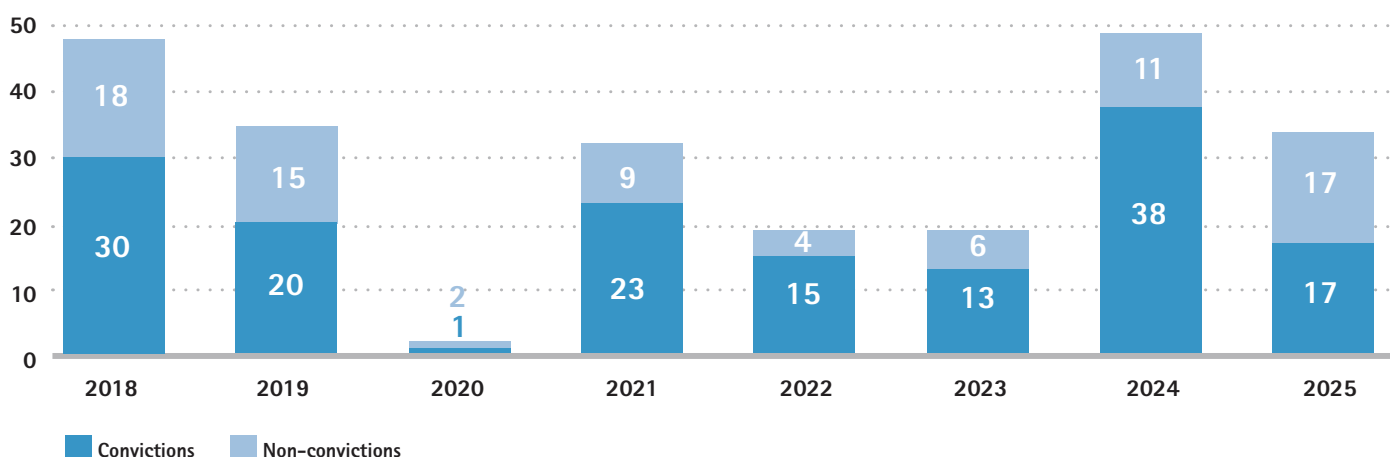
For this report, the Independent Anti-Slavery Commissioner requested data from the CPS under section 43 of the Modern Slavery Act 2015. This provides one of the few available sources of information on criminal justice outcomes in cases involving child trafficking and exploitation.

**Figure 5: Human trafficking/child abuse-flagged referrals and prosecution outcomes in England and Wales, 2018–2025**

### Referrals for a charging decision or early advice



### Completed prosecution outcomes



*Note: Referrals and completed prosecutions relate to different stages of the criminal justice process and should not be interpreted as outcomes for the same cases. Prosecutions dropped are included within non-convictions and should not be added separately to the total.*

The data show that the number of jointly flagged cases reaching prosecution has remained relatively small and has fluctuated considerably over time. In 2025, 34 completed prosecutions were recorded in cases carrying the human trafficking/modern slavery and child abuse monitoring flags. Seventeen resulted in conviction and 17 in a non-conviction outcome, including 11 prosecutions that were dropped. This compares with 49 completed prosecutions and 38 convictions in 2024. Across the period as a whole, there is no clear sustained increase in the number of completed prosecutions or convictions.

The figures relate to cases carrying both the CPS human trafficking/modern slavery and child abuse monitoring flags. As monitoring flags are applied at case level, where a case involves multiple defendants or offences the data cannot identify which individual defendant or offence the relevant flag relates to without examination of the case file.

The data also cannot be linked to children referred to the NRM and therefore cannot be used to calculate the proportion of identified child victims whose exploitation resulted in prosecution. Nevertheless, the small and fluctuating number of jointly flagged prosecutions, alongside the much larger number of children identified

through the NRM, reinforces the need for better child-specific criminal justice data capable of tracking what happens to cases involving child trafficking and exploitation.

The available evidence points to a substantial accountability gap between the scale of identified child trafficking and the number of cases reaching the criminal courts. Prosecution figures alone cannot measure the effectiveness of the response: cases may be disrupted through other offences or safeguarding and civil measures, and successful investigations will not always result in a trafficking charge. However, the absence of comprehensive child-specific data makes it difficult to establish what happens after a child is identified, how frequently perpetrators are investigated and prosecuted, or where cases are being lost within the criminal justice process.

Routine publication of data on investigations, prosecutions and convictions involving child victims would provide greater transparency and allow trends to be monitored over time. Data should distinguish the age of victims and, where possible, the form of exploitation and offences prosecuted. This would provide a stronger basis for assessing whether increased identification of child victims is being matched by effective action against those responsible for exploiting them.

The UK Government must develop a cross-criminal justice strategy to improve the investigation, prosecution and conviction of child trafficking and exploitation offences and address the significant disparity between the number of children identified as victims and perpetrators brought to justice.

The UK Government must strengthen specialist expertise across policing and prosecution services, improve the identification of child victims and address barriers to investigation and prosecution, ensuring that those who exploit children are consistently investigated and prosecuted using the full range of offences available.

The Crown Prosecution Service must routinely publish disaggregated data on investigations, prosecutions and convictions involving child victims of trafficking and exploitation, including the age of victims, forms of exploitation and offences prosecuted, to enable scrutiny of criminal justice outcomes and identify where cases are being lost.



## RECOMMENDATIONS



## Recommendations from the previous Snapshot that remain outstanding

### UK Government

1. The UK Government must develop a cross-government child exploitation strategy with prevention at its core, establishing a national framework for preventing all forms of child exploitation, strengthening coordination across government, education and early intervention, embedding contextual safeguarding, addressing exploitation in online environments, and setting clear outcomes against which prevention activity can be evaluated.
2. The UK Government must provide sustained investment in early help, youth services and specialist child exploitation services to ensure that children and families can access preventative support before exploitation occurs or becomes entrenched, reducing geographical inequalities in provision and reliance on short-term funding.
3. The UK Government must develop a cross-criminal justice strategy to improve the investigation, prosecution and conviction of child trafficking and exploitation offences and address the significant disparity between the number of children identified as victims and perpetrators brought to justice.
4. The UK Government must strengthen specialist expertise across policing and prosecution services, improve the identification of child victims and address barriers to investigation and prosecution, ensuring that those who exploit children are consistently investigated and prosecuted using the full range of offences available.

### Home Office

5. The Home Office must introduce a specific route to secure immigration status for confirmed child victims of trafficking where remaining in the UK is in their best interests, granting a minimum of five years' leave with a route to settlement.

6. The Home Office and Ministry of Justice must collect and routinely publish disaggregated data on the application of section 45 and the wider non-punishment principle to children, including the characteristics of defendants, offences involved and outcomes, to enable scrutiny of whether trafficked children are being effectively protected from criminalisation.
7. The Home Office must extend Independent Child Trafficking Guardian support beyond the age of 18, in line with leaving-care services, where young people continue to need specialist trafficking support, advocacy and continuity of an established relationship.

### Department for Education

8. The Department for Education must ensure that reforms to the commissioning of children's social care deliver sufficient safe, regulated and appropriate placements for trafficked and exploited children, with placement decisions reflecting risks from traffickers, going missing and re-exploitation alongside children's need for continuity of education, relationships and specialist support.

### Local authorities

9. Local authorities must ensure that transition planning for young victims of trafficking begins well before their eighteenth birthday and coordinates social care, accommodation, specialist trafficking support, immigration and legal advice, education, health and criminal justice services according to each young person's continuing needs and risks.

### Crown Prosecution Service

10. The Crown Prosecution Service must routinely publish disaggregated data on investigations, prosecutions and convictions involving child victims of trafficking and exploitation, including the age of victims, forms of exploitation and offences prosecuted, to enable scrutiny of criminal justice outcomes and identify where cases are being lost.

### Areas where there has been progress, but further action is needed

#### UK Government

11. The UK Government and devolved administrations must ensure that the child criminal exploitation offence and prevention orders introduced by the Crime and Policing Act 2026 are implemented consistently across the UK, supported by statutory guidance, specialist training and monitoring to ensure that children are identified and protected as victims of exploitation and perpetrators are held accountable.
12. The UK Government must ensure that the refreshed National Protocol on Reducing the Unnecessary Criminalisation of Looked-after Children and Care Leavers requires trafficking and exploitation to be considered before criminal justice action is taken and applies robust protections to children whose offending may be connected to exploitation.

#### Home Office

13. The Home Office must ensure that the national expansion of the Independent Child Trafficking Guardian service across England and Wales provides all unaccompanied and trafficked children with a direct and independent guardian, with sufficient resources to maintain meaningful relationships with children and effectively advocate for their best interests.
14. The Home Office must ensure that Independent Guardians across the UK are promptly informed of and able to contribute to NRM decisions affecting children they support, with effective communication between the Single Competent Authority, First Responders, local authorities and Guardian services.

#### Department for Education

15. The Department for Education must adopt a clear and consistent approach to defining child exploitation across statutory safeguarding guidance, recognising that children cannot consent to their own exploitation and ensuring that identification does not depend on demonstrating coercion, manipulation, deception or other means used by a perpetrator.

#### Devolved administrations

16. The Northern Ireland Executive must ensure that the Independent Guardian Service is sufficiently resourced to meet demand and eliminate waiting lists, so that eligible children have timely access to the independent support and advocacy provided for in legislation.
17. The Scottish Government must provide Guardianship Scotland with sufficient long-term resources to deliver its statutory functions and develop its capacity to identify and share intelligence on emerging trafficking patterns, routes and forms of exploitation across Scotland.

## New priorities arising from this Snapshot

### UK Government

18. The UK Government must amend immigration legislation to prevent children from being prosecuted for offences connected to their arrival in the UK and ensure that where age is disputed, no prosecution proceeds until age has been determined through an appropriate child-sensitive age assessment process.
19. The UK Government must remove provisions in the Immigration and Asylum Bill that require delayed disclosure, inconsistencies and omissions to be treated as damaging to credibility, ensuring that trafficking identification reflects the ways in which victims disclose abuse and exploitation.
20. The UK Government must ensure that every child identified as a potential victim receives the assistance and support required under ECAT, and must not remove existing statutory duties to secure trafficking-specific support for children without equivalent duties, adequate funding and mechanisms to monitor whether children receive their entitlements.
21. The UK Government must ensure that no child is disbelieved as a result of credibility grounds or disqualified from trafficking identification or protection on public order grounds, including where offending may be connected to their exploitation, and that access to protection is not determined by a child's nationality or immigration status.
22. The UK Government must amend section 45 of the Modern Slavery Act 2015 to remove the 'reasonable person' test for children in line with GRETA's recommendations.

### Home Office

23. The Home Office must urgently investigate and address the substantial disparities in NRM identification outcomes between UK and foreign national children, including whether nationality, immigration status, experiences of exploitation overseas or other factors are resulting in discriminatory barriers to identification.
24. The Home Office must ensure that children are not refused identification on the basis that their circumstances do not meet the definition of modern slavery where the nature of their potential exploitation has not yet been established.
25. The Home Office must strengthen the process for gathering evidence before Conclusive Grounds decisions are made, ensuring that children and the professionals supporting them are given sufficient opportunity and support to provide relevant information before a negative decision is reached on the basis of insufficient information.
26. The Home Office must ensure that all potential child victims whose age is disputed can access Independent Child Trafficking Guardian support until their age has been determined through an appropriate age assessment, including children initially treated as adults by the Home Office.
27. The Home Office must ensure that no child or potential child victim of trafficking is removed from the UK while their age, trafficking identification or related protection needs remain unresolved, with effective access to reconsideration and other procedural safeguards.

**Department for Education**

28. The Department for Education must strengthen statutory guidance on suspension and permanent exclusion to require explicit consideration of trafficking and exploitation risks, including the protective role of education, when decisions are made about children who are experiencing or at risk of exploitation.
29. The Department for Education must ensure that children's social care reform is backed by sustained investment in early intervention and youth services, so that local authorities have the capacity to identify and respond to trafficking and exploitation before harm becomes entrenched.
30. The Department for Education must ensure that Family Help and Multi-Agency Child Protection Teams have the specialist expertise, training and resources to identify and respond to all forms of child trafficking and exploitation.
31. The Department for Education and Home Office must urgently update statutory and practice guidance on trafficked and unaccompanied children and children who go missing, to reflect current legislation, the NRM and ICTG service, contemporary forms of exploitation, extra-familial harm, age disputes and changes to the immigration and asylum system.

**Crown Prosecution Service**

32. The Crown Prosecution Service must ensure that prosecutors consistently apply child-specific protections and the non-punishment principle in all cases where trafficking or exploitation may be relevant, including where the offence is excluded from the section 45 statutory defence.



## ANNEX 1: DATA TABLES

Figure 1: Negative Reasonable Grounds decision rate by nationality, children referred in 2025

| Nationality             | Children referred | Negative RG decisions | Negative RG rate |
|-------------------------|-------------------|-----------------------|------------------|
| Sudanese/South Sudanese | 453               | 215                   | 47.5%            |
| Iranian                 | 114               | 54                    | 47.4%            |
| Afghan                  | 135               | 50                    | 37.0%            |
| Eritrean                | 367               | 103                   | 28.1%            |
| Somali                  | 306               | 58                    | 19.0%            |
| Vietnamese              | 334               | 61                    | 18.3%            |
| Ethiopian               | 106               | 15                    | 14.2%            |
| Romanian                | 112               | 10                    | 8.9%             |
| UK                      | 4,333             | 274                   | 6.3%             |

Source: Home Office, Modern Slavery Research & Analysis. (2026). *National Referral Mechanism and Duty to Notify Statistics, 2014–2026*. 21st Edition. UK Data Service.

\*The negative RG rate is the percentage of children within each nationality group who received a negative Reasonable Grounds decision out of all children of that nationality referred to the NRM in 2025.

Figure 2: Negative Conclusive Grounds decision rate by nationality, children referred in 2025

| Nationality             | Positive CG | Negative CG | Negative CG rate* |
|-------------------------|-------------|-------------|-------------------|
| Sudanese/South Sudanese | 105         | 84          | 44.4%             |
| Iranian                 | 30          | 20          | 40.0%             |
| Eritrean                | 151         | 72          | 32.3%             |
| Afghan                  | 49          | 19          | 27.9%             |
| Somali                  | 145         | 56          | 27.9%             |
| Ethiopian               | 59          | 20          | 25.3%             |
| Romanian                | 70          | 17          | 19.5%             |
| UK                      | 3,058       | 589         | 16.2%             |
| Vietnamese              | 196         | 33          | 14.4%             |

Source: Home Office, Modern Slavery Research & Analysis. (2026). *National Referral Mechanism and Duty to Notify Statistics, 2014–2026*. 21st Edition. UK Data Service.

\*The negative CG rate is the percentage of children within each nationality group who received a negative decision among those who had received either a positive or negative CG decision. Children without a recorded CG decision are excluded.

Figure 3: Reasons for negative RG and CG decisions for children referred to the NRM in 2025

| Reason for negative decision                  | RG decisions | CG decisions |
|-----------------------------------------------|--------------|--------------|
| Did not meet the definition of modern slavery | 709 (67%)    | 117 (12%)    |
| Insufficient information                      | 342 (32%)    | 894 (88%)    |
| Not credible and did not meet the definition  | 8 (0.8%)     | 2 (0.2%)     |
| Not credible                                  | 1 (0.1%)     | 1 (0.1%)     |
| Total with a recorded reason                  | 1,060 (100%) | 1,014 (100%) |

Source: Home Office, Modern Slavery Research & Analysis. (2026). *National Referral Mechanism and Duty to Notify Statistics, 2014–2026*. 21st Edition. UK Data Service.

Note: Percentages are rounded. The table covers recorded decision reasons for the 2025 child referral cohort, rather than all decisions issued during 2025. The CG figures exclude cases without a recorded reason.

Figure 4: Asylum claims among children subject to immigration control referred into the NRM, 2024 – 2025

| Year of NRM referral | All child NRM referrals | Children subject to immigration control | Made asylum claim | No asylum claim | Asylum claim rate* |
|----------------------|-------------------------|-----------------------------------------|-------------------|-----------------|--------------------|
| 2024                 | 6,040                   | 2,322                                   | 1,714             | 608             | 73.8%              |
| 2025                 | 7,045                   | 2,744                                   | 2,087             | 657             | 76.1%              |
| Total                | 13,085                  | 5,066                                   | 3,801             | 1,265           | 75.0%              |

| Asylum claim/ outcome | 2024  | 2025 | Jan–Jun 2026 | Total |
|-----------------------|-------|------|--------------|-------|
| Awaiting outcome      | 221   | 920  | 717          | 1,858 |
| Granted*              | 1,064 | 890  | 177          | 2,131 |

| Asylum claim/<br>outcome        | 2024         | 2025         | Jan–Jun 2026 | Total        |
|---------------------------------|--------------|--------------|--------------|--------------|
| Refused <sup>†</sup>            | 347          | 221          | 41           | 609          |
| Suspended                       | 24           | 23           | 9            | 56           |
| Withdrawn                       | 58           | 33           | 12           | 103          |
| No asylum claim<br>made         | 608          | 657          | 300          | 1,565        |
| <b>Total children</b>           | <b>2,322</b> | <b>2,744</b> | <b>1,256</b> | <b>6,322</b> |
| <b>Grant rate<sup>*</sup></b>   | <b>75.4%</b> | <b>80.1%</b> | <b>81.2%</b> | <b>77.8%</b> |
| <b>Refusal rate<sup>*</sup></b> | <b>24.6%</b> | <b>19.9%</b> | <b>18.8%</b> | <b>22.2%</b> |

<sup>\*</sup> *Granted combines Grant Asylum, Grant Humanitarian Protection (HP) and Grant Other Leave.*

<sup>†</sup> *Refused combines Refused – No Right of Appeal (No RoA), Refused – Right of Appeal (RoA) and Refused – Third Country Unit (TCU).*

<sup>\*</sup> *Grant and refusal rates are calculated among asylum claims with a recorded grant or refusal. Claims awaiting an outcome, suspended or withdrawn are excluded from the calculation. The large number of outstanding claims, particularly among children referred in 2025 and January–June 2026, means these are not final grant or refusal rates for the cohorts.*

*Figures relate to children who were under 18 at the point of NRM referral and subject to immigration control. Years are based on the year of NRM referral rather than the year of the asylum decision. 2026 covers Q1 and Q2 only. Data were extracted on 1 July 2026.*

**Figure 5: Human trafficking/child abuse–flagged referrals and prosecution outcomes in England and Wales, 2018–2025**

| Measure                                              | 2018      | 2019      | 2020     | 2021      | 2022      | 2023      | 2024      | 2025      |
|------------------------------------------------------|-----------|-----------|----------|-----------|-----------|-----------|-----------|-----------|
| Referrals for a charging<br>decision or early advice | 11        | 8         | 19       | 28        | 35        | 31        | 31        | 24        |
| Convictions                                          | 30        | 20        | 1        | 23        | 15        | 13        | 38        | 17        |
| Non-convictions                                      | 18        | 15        | 1        | 9         | 4         | 6         | 11        | 17        |
| Prosecutions dropped                                 | 12        | 12        | 1        | 6         | 3         | 3         | 8         | 11        |
| <b>Total completed<br/>prosecutions</b>              | <b>48</b> | <b>35</b> | <b>2</b> | <b>32</b> | <b>19</b> | <b>19</b> | <b>49</b> | <b>34</b> |



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