



Changing childhoods.
Changing lives.

The Rt Hon Dame Karen Bradley MP

Chair of the Home Affairs Select Committee
House of Commons
London
SW1A 0AA

25 April 2025

Dear Dame Karen,

It was a great privilege to provide oral evidence at your Committee's recent non-inquiry session on the Modern Slavery Act: Ten-Year Review. I was very pleased to highlight the important work of our Independent Child Trafficking Guardianship (ICTG) Service and offer insights into the challenges and opportunities in addressing child trafficking, modern slavery, and child exploitation as we review the Act at this 10-year juncture.

My evidence emphasised the Act's positive impact on children and young people, particularly in the establishment of Independent Child Trafficking Guardians and the vital support the service provides to children and young people.

In our experience, the Modern Slavery Act's definitions of exploitation are modernised to accurately capture the diverse and evolving ways in which children are harmed, especially within the context of the digital world. This also necessitates ongoing training and education for professionals to enhance their ability to recognise indicators of exploitation and provide appropriate support, training that the National Counter Trafficking Service regularly provides with significant uptake across various sectors.

We find that effective cross-governmental and inter-agency collaboration at the local level is imperative in safeguarding children. I highlighted the improvements in information sharing and partnership work, specifically noting the positive impact of the devolved National Referral Mechanism (NRM) panels. We have observed the profound benefits of the devolved NRM panels in both the speed and the quality of decisions for children and young people in the NRM the roll-out of these panels will be, in our view, a game-changer for child victims.

I also emphasised the limitations on the service for children and young people, particularly around the transition of child victims to adult services, and the need to ensure that young people are empowered to make informed decisions about their continued involvement in the NRM as they turn 18. While the ICTG Service previously provided post-18 transitional support to these children, this is no longer the case, and we see a significant number of issues related to trafficking or exploitation occur at this critical juncture.

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In addition to these points raised, I would also like to provide the following supplementary evidence:

- **Child Criminal Exploitation offence**

We would support the introduction of a criminal offence of child criminal exploitation will aid the identification of victims, which would, in our view, see an increase in the provision and protection of child-specific, specialist support and advocacy services for children who are victims of criminal exploitation. Given that there is currently no statutory definition of child criminal exploitation, we see the offence poorly understood by police forces and children are often blamed and criminalised for their actions rather than being rightly safeguarded.

- **Section 45 defence**

Despite being exploited and trafficked children are unable to consent to their exploitation or a referral to the NRM, this fundamental understanding is sometimes misunderstood by several agencies, including the CPS and the Police. Even with this defence, children are still being criminalised. We have had experience of agencies seeing the s.45 defence as a 'get out of jail free card' and this is a language that is used at times on referrals to the ICTG Service.

- **Cross-governmental and inter-agency working**

Local authorities experience varying levels of need to support unaccompanied children and victims of child trafficking. Consequently, there is a disparity in the availability of best practice guidance and specialist training resources. Addressing the identified shortage of specialist foster carers and supported accommodation through a wider range of social care placements could be beneficial. We have also observed that central government departments operate with separate strategies, and there may be opportunities for improved coordination to enhance safeguarding for trafficked children, including unaccompanied asylum-seeking children.

- **Legal Aid**

Regarding legal aid, our experience indicates that uncertainty or delays in securing legal representation can contribute to detrimental mental health outcomes for the young people we support.

- **Missing Children**

Trafficked and unaccompanied children are particularly vulnerable to going missing shortly after placement, with a heightened risk within the first week and especially within the initial 48 hours. We note that Modern Slavery investigations can be paused when young people go missing, which coincides with a period of heightened risk of re-trafficking. Exploring strategies to mitigate this risk during the missing period could be valuable.



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Thank you for considering these additional points. We would be delighted to extend an invitation for you to visit our service later in the year, to engage with more of our young people and further explore important issues raised during the Select Committee non-inquiry session, and I look forward to working with you and the Committee in the future.

Yours sincerely,

A handwritten signature in black ink, appearing to read "E Hawley". The signature is fluid and cursive, with the first letter 'E' being large and prominent.

Emma Hawley
Assistant Director of Barnardo's National Counter Trafficking Centre