



Tackling Child Exploitation
Support Programme

A complex challenge: responding to child victims of modern slavery and human trafficking

Introduction

This discussion that follows is based on interviews with three experts in modern slavery and human trafficking:

- > **Lucy Dacey** (National Programme Manager for the national programme Disrupting Exploitation at The Children's Society)
- > **Phil Brewer** (Director of Intelligence at STOP THE TRAFFIK, Specialist Advisor at the Human Trafficking Foundation, TCE Programme Delivery Partner, and former Detective Superintendent for the Metropolitan Police, Modern Slavery and Kidnap Unit)
- > **Kate Garbers** (Independent Modern Slavery Consultant, Research Fellow Survivor Support at the Rights Lab, University of Nottingham, and former Director of Unseen UK)

This resource seeks to explore some of the key issues and areas of complexity in the fields of modern slavery, human trafficking and child exploitation.

Topics discussed by the interviewees included:

- > the interconnections between modern slavery, human trafficking and child exploitation, and how these are understood
- > the problems associated with the siloed systems that have been developed to address these different forms of harm
- > the key challenges for strategic responses to modern slavery, human trafficking and child exploitation at the local partnership level
- > the value in partnership working
- > the opportunities and challenges of using the national referral mechanism (NRM).

Understanding of Modern Slavery, Human Trafficking and Child Exploitation

The interviews with Lucy Dacey, Kate Garbers and Phil Brewer began by exploring their views of how modern slavery and human trafficking is understood, particularly in relation to child exploitation and extra-familial harm. All three participants saw modern slavery, human trafficking and child exploitation as being inextricably interconnected, with coercion and control underpinning them all. Lucy Dacey noted that, in practice, a child or young person often experiences more than one form of abuse and therefore rarely fits neatly under one label. Instead, lived experiences of abuse are much more complex and nuanced.

However, across the sector, the understanding of modern slavery and human trafficking was described by Lucy, Kate and Phil as being much more mixed.

The Modern Slavery Act (2015) sets out the key offences of 1) slavery, servitude and forced or compulsory labour and 2) human trafficking. All three experts agreed that despite the name of the Act connecting these forms of abuse, in practice, they are understood by frontline practitioners as being distinct and separate from one another. Lucy Dacey referred to the high levels of demand for training around child exploitation, extra familial harm, the NRM and modern slavery that The Children's Society receives from frontline practitioners, suggestive of gaps in workforce development and professional training.¹ As with all types of exploitation, modern slavery and human trafficking practices are constantly evolving as perpetrators try to evade detection. Therefore there is a training need not only for newly qualified practitioners but also for experienced professionals further along in their career to stay abreast of developments.

All three interviewees acknowledged the benefits of the Modern Slavery Act, including how in recent years it has led to a growing understanding amongst professionals of modern slavery and human trafficking. However, there was a clear consensus about the challenges practitioners faced across the sector in having so many different terms and categories of child abuse and exploitation to understand and navigate.

One issue noted by Dacey is the failure of practitioners to link criminal exploitation (and in particular country lines) with human trafficking due to a misunderstanding of what constitutes as 'movement'.

There's an ongoing debate amongst professionals about how to define movement of travel in relation to human trafficking. Some still question whether very short distances qualify as human trafficking, even when coercion and control are at play. Therefore many cases of child

1. The sector survey carried out by TCE in 2020 also highlighted that practitioners feel less confident in their understanding of modern slavery and human trafficking

criminal exploitation are not understood or categorised as human trafficking. Dacey argues that there needs to be greater awareness amongst practitioners that ‘travel’ does not have to entail travelling across legislative boundaries, and can even mean travel within a town.

To further complicate matters, Brewer and Dacey draw attention to the fact that, in practice, not all criminal activities are perceived as being applicable to the ‘exploitation or trafficking defence’. Whilst criminal exploitation has a broader definition on paper, in practice it is often narrowly understood by practitioners as being just county lines. Dacey feels that more work needs to be done to broaden that working definition so that it includes other criminal activities such as carjacking, shoplifting or violence against another person.

The view of Brewer, Dacey and Garbers is that preconceived ideas persist about who a victim of modern slavery and human trafficking might be. For example, many practitioners still see it as something that only happens to non-UK national children and unaccompanied minors. These preconceptions can result in some children not being identified as victims of modern slavery and human trafficking, and other children being incorrectly assumed to be victims of modern slavery and human trafficking as a result of their ethnicity.

‘If someone’s been an experienced practitioner with loads of experience under their belt, they still need that continued professional development and that understanding that concepts around exploitation can change. There is that perception that’s quite historic, that modern slavery and human trafficking is... well the default I think that people imagine is international trafficking victims.’
– Lucy Dacey

There was also some evidence of changing practice in the sector. Dacey reflected that some practitioners were making the links between criminal exploitation and modern slavery and human trafficking. She wondered if this might be linked to the fact that there is currently no offence of child criminal exploitation that someone can be charged with, therefore providing an impetus for professionals to look at the links between criminal exploitation and modern slavery and human trafficking in order to get some justice for the young people affected. There has also been a huge rise in NRM referrals over the last few years,² the majority of which are for the domestic trafficking of children and young people.

2. See the [latest ONS data](#), which sets out the steady increase of referrals to the NRM, up by 36% from 2017-18, of which almost half (45%) were under 18 years.

Victim or perpetrator?

Brewer drew attention to the fact that unlike with child sexual exploitation, cases of criminal exploitation are rarely clear cut in terms of being able to assess when and how control and coercion have been exerted and whether elements of a child's journey might have initially been a choice. This is relevant because the activities are criminal acts, so if a young person is seen as having consented to them, they can be held criminally responsible.

In this context, where not all crimes seem to be open to the exploitation defence, Brewer sees us entering very 'murky territory' as we try to navigate and assess whether a child is a victim or a perpetrator in relation to different criminal activities that children engage in. Brewer thinks this needs to be linked to a wider conversation about the age of criminal responsibility in the UK, which at 10 is lower than in many European countries.

Instead of focusing solely on trying to decide whether a child is a victim or a perpetrator, Brewer believes there should be a greater emphasis on trying to understand why a child or young person might end up being involved in a criminal activity in the first place. Furthermore, there must be space for a more nuanced understanding that allows these children and young people to be both a victim and a perpetrator. We should be wanting to understand the drivers and causes, whether or not a child has been coerced or made a choice that they could legally be responsible for³. Either way there is a benefit to understanding how a child got to that point. Brewer argues that using the multiple lenses of child exploitation, modern slavery and human trafficking can help practitioners better understand and draw out a child's journey in order to comprehend how they ended up at that point. This will in turn help practitioners to think about how to best address young people's needs, and to develop better approaches to prevention work.

3. NB Dr Helen Beckett refers to the concept of 'constrained choice' in relation to young people experiencing CSE, arguing that a new narrative is required that 'must be capable of accommodating the co-existence of choice and constraint, benefit and harm, and victimhood and agency': Beckett, H. (2019). *Moving beyond discourses of agency, gain and blame: reconceptualising young people's experiences of sexual exploitation*. In J. Pearce (Ed). *Child Sexual Exploitation: Why theory matters* (p. 23). Policy Press.

‘Even if you disagree on whether it’s been a choice the child has made and should be responsible for – we should still try to understand why they have got to that point... I think there needs to be a greater emphasis on the fact that this isn’t just about someone being an out and out victim, or someone being an out and out perpetrator, it’s actually looking at their whole story, and looking at where on that sliding scale they fit.’ – Phil Brewer

Navigating complexity

The interviewees argued that identifying and responding to these forms of child abuse requires a coordinated approach. However, all three raised concerns that the system in place to do so is siloed. For example, there are separate safeguarding processes for each type of abuse, whether that is child sexual exploitation, criminal exploitation or human trafficking. Brewer, Dacey and Garbers all felt that this reinforces the belief of frontline staff that these forms of abuse are very separate, which runs the risk of taking children and young people down a ‘prescribed route’ that does not consider or meet all their needs. They argue that not enough time is spent thinking about how new types of exploitation that require a safeguarding response might interconnect. Little thought is given to how current services and approaches could adapt to provide a coordinated response and, instead, a new team, approach or referral system is set up, further reinforcing the siloed system.

‘When a new “label” for a type of abuse comes along, I don’t feel like anyone gets the time to sit and think – “what have we previously labelled this?”, “how has it been previously presented?”, “what did we try to do to address it?”. This would then ideally lead on to thinking and understanding what in the current system will help us, but also what is missing and what we need to amend, change and alter in order to meet the needs of this group.’ – Kate Garbers

All three interviewees agreed that it is important that the system recognises the need to address all forms of child abuse in a more coordinated way in order to effectively respond to the needs of children and young people. Brewer argues that this requires simplifying the safeguarding approach used to identify victims of abuse and focusing on the overlaps between modern slavery, human trafficking and exploitation.

Brewer describes frontline practitioners as being continually bombarded with training, resources and indicator checklists for different types of child abuse, including modern slavery, child trafficking and child exploitation. This can be overwhelming and lead to information overload and fatigue. Whilst he understands it can be helpful to have all these different lists of indicators,⁴ he wonders if it might be even more helpful to focus on equipping practitioners to spot when the underlying common factors are at play, i.e. when a child is experiencing control and coercion. He also believes that this will provide a better opportunity to understand a child's experiences in a more holistic way.

Relating this to her experience on the ground, Garbers made reference to how common it was for the frontline professionals she engaged with (in relation to the Unseen Children's House - a pilot project involving opening the first specialist safehouse for trafficked children in the UK) to fail to identify or understand the indicators of modern slavery and human trafficking. This led to victims of modern slavery and human trafficking not being referred to the Children's House and many inappropriate referrals being made instead.

'What we found with the children's home was that people weren't spotting the indicators of trafficking full stop. We had real issues, even though we had been to all the local authorities and we'd sent them information packs and we'd been to local safeguarding boards to discuss 'This is slavery. This is trafficking. This is what the project is for.' Everyone appeared to back it and understand the need for it but the amount of inappropriate referrals we'd have! We very much felt that they weren't spotting the indicators of trafficking in the first place.'

– Kate Garbers

Brewer contends that this tendency to see all these different forms of child abuse as distinct starts at the very top. He argues that there has never been a joined up approach in terms of a national response to modern slavery, human trafficking and child exploitation. Even at the highest level, when developing national strategic approaches, there is a real lack of connecting the dots (a key finding of [the Wood Review](#)). This also means that learning from

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4. Although it should be noted that there are issues with the [current use of tools and checklists to assess risk](#) of exploitation due to a lack of evidential underpinning, which means [a more holistic approach is advocated](#).

different parts of the system is not being shared. Phil Brewer gives the example that despite it being six years since the Modern Slavery Act was introduced, modern slavery is still referred to as a standalone issue within the most recent child exploitation strategy. Whilst the strategy does mention modern slavery, it does not give an explanation as to how modern slavery and child sexual exploitation might interact and instead portrays them as very separate issues. Brewer sees this as directly perpetuating the siloed approach to modern slavery, human trafficking and child exploitation at a more local level.

Challenges for strategic responses to modern slavery, human trafficking and exploitation at local partnership level

All three interviewees agreed that the level of awareness and capacity to respond to modern slavery, human trafficking and exploitation has increased significantly over recent years. However, they all noted that fundamental challenges, beyond spotting the signs, still existed and acted as significant barriers to how local areas are able to respond.

Summarised below are some of the key challenges that were discussed around:

- > identifying and supporting victims
- > developing appropriate services
- > commissioning and referral processes
- > initial responses.

Identifying and supporting victims

Garbers and Brewer talked about a lack of partnership working around identifying victims as an ongoing challenge. Both spoke about the lack of trust and power games at play between different agencies. Garbers referred to instances in relation to her work with the Unseen Children's House where police and social care would disagree about the indicators they were observing after identifying a potential victim of trafficking and exploitation. This could lead to disputes about the right course of action and children consequently not being referred to the home. Garbers raises concerns about whether this leads to some children not then receiving the support that can adequately meet their needs. As reported in the evaluation for the Unseen Children's House, *'Some police officers reported that their recommendations were ignored by social care. In one case, a child the police wanted to place with CSSW [Unseen Children's House] subsequently went missing. Police fundamentally believed this outcome could have - and should have - been avoided with the resource CSSW was offering in the area'⁵.*

Brewer and Dacey both spoke about how children and young people do not necessarily recognise that they are being trafficked or exploited and may not be receptive to engagement or support from statutory services. Timing can be very important in terms of when support is offered. Brewer explained that trying to convince a child or young person that they are a victim of exploitation when they are not ready to hear it can be a traumatic experience that causes further damage, and can lead them to shut down and disengage entirely. The challenge for local areas is therefore not only to identify victims of trafficking and exploitation, but to develop an engagement approach that accounts for the fact that a child or young person may not be receptive right away. This involves having to be prepared to wait till the child or young person is ready to accept support. Whether current services are able to engage with children and young people in this way is questionable.

5. Kate Garbers & Rachel Leather (2020) Missing Home – Providing safety to trafficked children. Unseen https://www.unseenuk.org/wp-content/uploads/2021/09/unseen_childrens_report.pdf

Developing appropriate support services

It is hard to develop and commission the right services to respond to modern slavery, human trafficking and exploitation without having an accurate idea of how many children and young people are experiencing these forms of abuse. Dacey spoke about how local areas do not have access to the right data in order to plan and commission services effectively. This makes it hard for them to know what kind of capacity these services require in order to meet existing needs.

Garbers also questioned whether local areas have the appropriate and tailored support in place to meet the specific needs of children and young people that are victims of modern slavery, human trafficking and exploitation. Related to this, Dacey referred to the need to continue to push conversations about [contextual safeguarding](#) and whether the current child protection plan provides the right support for children who are victims of modern slavery, human trafficking and child exploitation. She questions whether it is fit for purpose, given it was developed to meet the needs of children experiencing abuse and neglect within the home. She argues that it is not well equipped to respond to extra familial harm.

Commissioning and referral processes

Garbers shared insights from the evaluation of the Unseen Children's House about challenges with referral processes. The pilot project found that it sometimes appeared that social care services were making decisions about where to place a child who is believed to have experienced trafficking based on factors such as age and cost, not around how to best meet the needs of that child. It appeared as if, at a certain age, the care system pushed a child down a particular pathway (foster care or independent living) regardless of the risks and needs associated with the abuse they might have experienced. Garbers notes that often those types of accommodation are not able to provide the necessary support for victims of modern slavery and human trafficking, particularly in the first 72 hours.

'My understanding from running the project has been that for most children, if they are 16, 17, 18 upon being interacted with, the likelihood is they will be placed in foster care or independent living. For a potentially trafficked child to go into either of those situations... is not necessarily going to protect that child who is dealing in the first 72 hours with a variety of push and pull factors. So instead of looking at that child as an individual, it felt like people were going, "Well, you're this age. Therefore [this pathway it is]."' – Kate Garbers

Garbers also noted that rigid commissioning frameworks can act as a barrier to getting children and young people who have been victims of modern slavery and human trafficking into the right placement. Local areas that could refer trafficked children to the Unseen Children's House were having to first go through a list of 'generic' children's homes or foster placements on their commissioning frameworks, before being able to commission a place at a children's home designed specifically to meet the needs of a trafficked child. There appeared to be no specialised referral process for children and young people suspected of being victims of human trafficking. In effect, these children were entering a system that was saying their needs could be met by services that have not been developed to meet them or to manage the particular risks associated with trafficked children.

'Throughout the time leading up to and then running the pilot children's home, there was never any specific commissioning for services specifically for trafficked children. So we were trying to almost shoehorn this almost specialized project into generic commissioning frameworks. Does the sector genuinely believe that a trafficked child or exploited child can fit in to the services we currently have? If the answer is yes, fine - let's not change anything. I would argue the answer is probably no.' – Kate Garbers

As set out by the UN Convention on the Rights of the Child, non-UK national children should be entitled to the same treatment and rights as UK national children. Dacey and Garbers both noted that in practice it still seems to be that different children are accessing different services and support depending on their nationality status. Garbers argues that there is still a common misunderstanding amongst frontline professionals about the fact that all children should get exactly the same access to all available services and support.

Initial responses

Through her work with the Unseen Children's House, Kate Garbers also found that strategy meetings were not always being held within the first 72 hours after a potential victim of modern slavery, human trafficking and exploitation is identified. This is despite the fact that research⁶ shows the first 72 hours are crucial, with a significant number of trafficked children going missing and / or returning to their exploiters within that time frame. Does more work need to be carried out to ensure that multiagency strategy meetings are taking place in those first 72 hours, and that appropriate 'holding places' are available that can keep children you suspect as being victims of modern slavery, human trafficking and child exploitation safe whilst this takes place?

Garbers also highlights the tension that exists between respecting the rights of a child and placing no restrictions on liberty and trying to keep children safe in those first 72 hours. She notes the conflicting approaches and culture between police and social workers, with social workers preferring not to place restrictions on a child or young person's liberty and police having access to police protection orders to help keep trafficked children safe. This highlights an ongoing debate about whether respecting a child or young person's freedom and choice is at odds with or integral to keeping a child safe. One of the key recommendations following the Unseen Children's House pilot project was that, *'Police protection orders should be considered as standard practice when a trafficked child is encountered. This will enable police to be more involved in placement decisions and will allow access to appropriate services that will offer immediate protection for potentially trafficked children (regardless of their age).'* Whilst such an order would restrict a child's freedoms, the report argues that this would lead to less trafficked children going missing.

6. The Children's Society (2020) Best practice guide: Speaking to a migrant young person when they first come into local authority care. [72 hours guide by The Children's... - Flipsnack](#); Home Office (2021) Interim Guidance for Independent Child Trafficking Guardians: [Interim Guidance for Independent Child Trafficking Guardians \(publishing.service.gov.uk\)](#)

Importance of partnership working

There was strong consensus amongst interviewees about the value of partnership working in order to effectively respond to modern slavery, human trafficking and exploitation and to tackle the various challenges outlined above.

Dacey stressed that it would only be through partnership working that the sector would achieve the changes and improvements that the safeguarding system so desperately needs. Sharing of information would bring the learning required to adapt current ways of working and make them more effective and fit for purpose.

Brewer argued that, through partnership working, a more coordinated response to modern slavery, human trafficking and exploitation could occur, as could greater focus on prevention and a wider long term strategy.

All three interviewees spoke about the different strengths and limitations of different agencies in terms of identifying, accessing and supporting children who are victims of modern slavery, human trafficking and exploitation. As such, it was of vital importance that each agency recognised what it was best placed to do, and where the expertise and knowledge of other organisations would be useful and necessary.

For example, Brewer spoke about the need for police to develop more innovative partnerships with organisations that young people are more likely to disclose to about abuse and exploitation. Police tend to work in a reactive way, coming into contact with children and young people in a particular ‘hotspot or danger area’ after a suspected crime has taken place. So they are rarely trusted by many children and young people, and unable to spend the time it takes to slowly gain that trust. Police must therefore work with organisations who are better equipped to work with children and young people over a longer period of time – to build rapport and trust – which will more likely lead to disclosures and the necessary engagement to get young people the support they might need.

All three interviewees talked about the importance of getting agencies in a local area in the room together to share information and expertise. Professionals need to look at modern slavery, human trafficking and exploitation as a shared challenge. Brewer argues that many partner organisations continue to be unaware of what other organisations in the same geographical area are able to offer and what information they have access to. Both Dacey and Garbers argued that police are further along than social care in their understanding of the risks and indicators of modern slavery, human trafficking and exploitation (having played a more active role in many of those crimes, albeit through a criminal justice lens rather than a safeguarding one). It is also the police who often find children and young people in places where the abuse or exploitation takes place. They therefore have access to certain indicators of modern slavery and human trafficking that other professionals do not. Partnership working in

these contexts is therefore essential in order to share information and build a more complete picture in order to effectively identify victims and provide the appropriate support.

The interviewees also spoke about the value of partnership working for the constructive challenging of ideas and misconceptions that professionals may have. For example, social care is still on a journey towards understanding that extra familial abuse necessitates a different approach, and continual challenge is needed about the appropriateness of a child protection framework built to address abuse and neglect in the family home. Police, however, still have a long way to go in terms of understanding that a child or a young person can be both a victim and a perpetrator. Their perceptions about how a 'victim' will present require further challenge.

'These young people are likely to have very complex lives and any one agency will only ever know a fraction of that picture. So actually bringing organisations together is critical in order to provide that holistic support.' – Lucy Dacey

'If professionals spoke to one another more, shared information and expertise – it would help break down some of these misconceptions.' – Phil Brewer

Dacey, Garbers and Brewer all agreed that the sharing of knowledge and expertise, the constructive challenging of assumptions, and a more coordinated and holistic response to modern slavery, human trafficking and exploitation, happened most effectively where multi-agency responses and partnership working were already well embedded in a local area. The three interviewees identified some of the enabling factors for effective partnership working in this field:

- > A partnership made up of a diverse group of organisations that goes beyond only statutory agencies such as the police, social care and health. The most effective partnerships will include non-traditional partners, such as businesses, charities and community organisations. This is vital in order to capitalise on the breadth of available expertise, experience and perspectives.

- > Organisations working in partnership take joint responsibility for responding to modern slavery, human trafficking and child exploitation.
- > Each partner clearly understands their own role in achieving a joint vision – everyone needs to be moving in the same direction.
- > A mature partnership where safe spaces exist to have sensitive yet robust discussions, where professionals can disagree and challenge one another constructively.
- > Spaces where multi-agency partnerships can collectively problem solve by discussing real cases in real time.
- > Partnership working that is underpinned by certain principles adhered to by all organisations. This includes being child-centred, adopting a contextual safeguarding approach, and always taking a holistic view when assessing the needs of a child.

‘In terms of knowledge and experience, we all hold different toolkits to fix a problem. We need to create a scenario where we’re looking at an issue in a more joined up way. It really offers that opportunity to look at it more from a long-term strategic perspective, of actually what else can we do to prevent this happening again. So I think [partnership working] offers much more breadth and depth in terms of what a plan [for responding to modern slavery, human trafficking and exploitation] will look like.’ – Phil Brewer

NRM

The NRM is the UK's system for identifying and supporting potential victims of modern slavery. Dacey and Garbers both acknowledge that, on paper, the NRM is a positive initiative. It is important to have a formal mechanism that recognises when children are victims of modern slavery and, when there is a positive ruling, it can be a critical part of a young person's defence in court if they have been criminally exploited. An NRM ruling is admissible evidence in a criminal trial and can have an impact on the custodial sentence that a young person might receive. However, both Garbers and Dacey felt that significant structural failings currently limit the use of the NRM. Some of the most significant challenges are summarised below. It is important to note that a scheme piloting a different way of how NRM decisions are made has been launched across the UK.

A positive NRM ruling does not then lead to a child or young person that has parental support in the UK receiving any further support. Dacey highlighted the exacerbation felt by practitioners about this, and, in particular, explained that when a young person that has been domestically trafficked within the UK has a parent or a carer, a positive NRM ruling does not even lead to them being able to access an independent advocate. Social workers have a lot of different processes and procedures to follow when identifying a child at risk of harm. Since the NRM does not need to be completed for a child who has parental support in the UK to receive any kind of assistance, Garbers notes that many professionals might regard the NRM process as not very useful and a waste of time.

'I think the fact that the NRM doesn't have to be completed for a child to get support or access to help means that, in amongst everything else that the social worker is doing, it probably isn't a priority. So it does feel for children that it is more of a data collection activity because it doesn't equate to support.'

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The NRM enters the equation rather late in the overall journey that a child or young person must take through the criminal justice system. It becomes most useful only as a defence in court – by which point a young person has already had to endure further harm by going through the criminal justice system on top of the abuse and exploitation they have already experienced. There was much debate as the NRM bill went through parliament as to whether a positive NRM ruling should result in a statutory defence or non-prosecution. Much of the sector was asking for non-prosecution and it is frustrating that instead it only amounts to a statutory defence. Dacey spoke about how, when a positive NRM ruling is given mid-way through criminal proceedings, those proceedings are often allowed to run their course, even

7. UK Human Rights Blog (2020) Trafficking victim conclusive grounds decision admissible evidence at trial: <https://ukhumanrightsblog.com/2020/12/21/trafficking-victim-conclusive-grounds-decision-admissible-evidence-at-trial/>

8. Every Child Protected Against Trafficking (2021) pilot launched for local decision-making for trafficked children: [Pilot launched for local decision making for trafficked children | ECPAT UK](#)

when the prospect of a conviction is non-existent. She argues that much more work must be done to think about how NRM rulings should be taken into account by the wider criminal justice system to avoid the re-traumatising process of criminal justice proceedings for these children and their families.

There is not enough multi agency collaboration and input into NRM submissions. Dacey argues that it is imperative that submissions include as much evidence from a range of agencies in order to compile the most complete picture of a young person's circumstances and increase the chances of receiving a positive NRM ruling. Dacey talked about how there is often a well-placed desire to submit an NRM as quickly as possible in order to kick-start the process, and therefore professionals do not always take the time to seek all the available information other agencies may have. Though this can be done with the best of intentions, it can also lead to a negative NRM ruling. Dacey asks whether a potential benefit of the pandemic is that it has shown professionals that multi-agency meetings can be held remotely and therefore carried out more quickly. She hoped this would lead to more multiagency NRM submissions.



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