



# Final monitoring report

## Local authority pilots of the London Safeguarding Trafficked Children guidance and toolkit

London Safeguarding Children Board Child Trafficking Pilot Toolkit  
Monitoring Group  
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This report has been prepared by the London Safeguarding Children Board (London SCB) in conjunction with the National Child Trafficking Pilot Toolkit Monitoring Group. The report is intended to inform new developments and changes to the London SCB toolkit and guidance for safeguarding children who have been trafficked. The views in the report were informed by a data collection exercise collating the experiences and perceptions of local authorities and police forces involved in the pilot.

While the recommendations are based on best available evidence from the monitoring exercise, it is recognised all agencies are currently working under financial and resource constraints that may impact on immediate implementation.

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The London Safeguarding Children Board would like to thank the 12 LSCB areas involved in piloting this guidance and toolkit...

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Manchester City Council  
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... and the members of the London Trafficking Toolkit Monitoring Group:

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United Kingdom Border Agency (UKBA)  
United Kingdom Human Trafficking Centre (UKHTC)  
Child Exploitation and Online Protection Centre (CEOP)  
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## Acronyms and abbreviations

A&E	Accident and emergency department (hospital)
CA	Competent authority
CAF	Common assessment framework
CAIT	Child abuse investigation team
CEOP	Child exploitation and online protection centre
COE	Council of Europe Convention on Action against Trafficking in Human Beings
DFE	Department for Education (formerly DCSF)
ECPAT	End Child Prostitution, Child Pornography and the Trafficking of Children
ICS	Integrated children's system
IT	Information technology
JIT	Joint interview technique
London SCB	London Safeguarding Children Board (or 'the London Board')
LSCB	Local Safeguarding Children Board
MOU	Memorandum of understanding
NRM	National Referral Mechanism
NRUC	National register for unaccompanied children
NSPCC-CTAIL	National Society for the Prevention of Cruelty to Children's National Child Trafficking Advice and Information Line
PCT	Primary care trust
PPD	Public protection desk (police)
UASC	Unaccompanied asylum-seeking children
UKBA	United Kingdom Border Agency
UKHTC	United Kingdom Human Trafficking Agency
VCS	Voluntary and community sector

## Executive summary

Following the UK Government's ratification of the Council of Europe Convention on Action against Trafficking in Human Beings in December 2008, a National Referral Mechanism (NRM) was implemented for adults and children trafficked into and within the UK. To accompany this mechanism the London Safeguarding Children Board developed an assessment framework and guidance to support practitioners and policy makers working with suspected victims of child trafficking. This framework and guidance was piloted as the *London SCB London Safeguarding Trafficked Children Toolkit 2009* in 12 local authority areas across the UK and monitored by a national monitoring group consisting of representatives of various interested stakeholders. The monitoring included three short questionnaires for the 12 pilot local authorities and corresponding police forces, with additional statistics provided by UK Human Trafficking Centre (UKHTC).

This monitoring report is being undertaken by the London Safeguarding Children Board to identify ways in which the assessment framework in the toolkit facilitated or hindered the identification, assessment and support of trafficked children in the 12 pilot local authority areas. This information is intended to inform the redrafting of the 2006 London Procedure for Safeguarding Trafficked and Exploited Children and the development of safeguarding procedure and practice in existing and future national trafficked children mechanisms. It will also enable London boards and their partner agencies to share good practice in local safeguarding responses to trafficked children.

## Key findings

Overall, the *London Safeguarding Trafficked Children Toolkit 2009* has helped pilot authorities to develop, implement and strengthen good practice in the safeguarding of trafficked children. The toolkit has assisted in the identification of 56 trafficked children during the pilot period, 47 of whom were referred to the National Referral Mechanism (NRM). Certain tools and sections of the guidance were widely used in this identification. However, rather than just being a set of discrete tools, the toolkit offered pilot authorities a comprehensive framework with which to approach the safeguarding of trafficked children. At the heart of this framework is multi-agency working, which recognises that trafficking is a complex form of child abuse and requires a proactive response supported by specialist training and input from professionals, voluntary groups and community agencies alike.

Pilot authorities have had varied experiences of implementing this framework in their boroughs, and this variation has highlighted a range of key factors that can assist implementation by any local authority. These factors include strong leadership, staff specialism, robust identification and assessment processes, multi-level inter-agency training and consistent, informed multi-agency engagement throughout the safeguarding process. These factors and others are captured in the following key findings, which particularly address the persistent challenges faced by pilot authorities in developing and maintaining a multi-agency approach.

- Identification of trafficked children is a major challenge for pilot local authorities in a context of low public awareness, professional reluctance to accept child trafficking as a live issue in the UK, inconsistent levels of multi-agency engagement, and the rapid speed with which trafficked children can go missing.

- Some trafficked children face strong pressure to go missing, ie to return to the trafficker or trafficking network, within 24 hours of being identified. All agencies need to recognise the challenges faced in safeguarding these children and the importance of the first 'golden hour' in rapidly implementing safeguarding measures for newly identified trafficked children.
- Many authorities compare trafficking to other child protection issues such as child sexual abuse, where extensive training and awareness building is needed across all agencies and the general public to build acceptance of the issue as child abuse and to develop skills to respond to it.
- Child trafficking needs to be recognised as a highly complex area of child protection that requires an intensive, concerted and *resourced* response.
- Pockets of child trafficking safeguarding expertise exist in pilot authorities, especially where specialist trafficking posts exist, greatly enhancing local authority capacity to identify and safeguard trafficked children. Pilot authorities with a lead child trafficking safeguarding coordinator find it easier to coordinate a multi-agency safeguarding response and track cases from identification to NRM referral.
- Nine pilot authorities identified 56 cases of trafficked children during the pilot period – at least two cases in each of the nine authorities.
- Pilot authorities rated the *Risk assessment matrix for children who may have been trafficked* as the most useful tool, considered a 'must-have' by two-thirds of them, though it may be problematic for younger children.
- Feedback is mixed on the second key tool used in identification and assessment, the *Trafficking assessment*. Some saw it as lengthy, repetitive and additional to the Integrated children's system (ICS) assessment process, while others thought it a useful and comprehensive guide to areas to investigate, particularly for practitioners new to trafficking safeguarding. A concern exists where the risk assessment matrix is being used in its place – a shorter version of the Trafficking assessment is likely to be used more widely.
- The assessment of children suspected of being trafficked can be problematic. Short assessment timescales do not recognise the complexities of disclosure, and can reduce the quality of the trafficking assessment and traumatise children. Additional information often emerges after initial investigations, and practitioners find it difficult to change initial assessments and lack clarity on how to input newly disclosed information on trafficking following NRM decisions.
- Multiple interviews by various agencies can be traumatic for a child; more streamlined information-gathering through a single, holistic, multi-agency interview is preferred.
- Age assessments remain a controversial issue for child protection and asylum teams. Pilot authorities felt strongly that decisions about the age of trafficked children are best made through social interaction and social work assessment.

- Training and/or awareness-raising is critical in building local authority and multi-agency safeguarding capacity. All pilot authorities provided some degree of training to a broad range of teams, the police and the VCS sector. However, more training is needed, particularly of frontline and first responder services.
- Many pilot authorities have implemented the multi-agency response required to address child trafficking, with a wide selection of agencies involved in training and/or the identification and assessment process. Trafficked children are safeguarded best where a multi-agency approach is working well. However, it takes considerable time to build a 'level playing field' in local authority capacity to deal with trafficking and to develop effective multi-agency working. The United Kingdom Border Agency (UKBA) is recognised by local authorities as a new partner around the child protection table.
- Effective information-sharing can take a longer time than may be available to accurately assess and refer a child within the timeframes provided by the NRM, eg the 45-day reflection period. Local authorities would prefer full engagement by all agencies during the case conference process and before a NRM referral is made, and by the competent authority (CA) after the NRM referral during reasonable and conclusive grounds decision making.
- Police engagement with Children's Services on suspected trafficking cases is considered variable across boroughs: police can be reluctant to act on suspicions, even where the matrix is used. The degree of investigation that should be undertaken by social workers needs to be spelled out more clearly, especially where police involvement is limited or absent. Engagement is assisted by early identification of the borough's police trafficking lead, eg Public Protection Desk (PPD) or Child Abuse Investigation Team (CAIT) and development of joint protocols.
- The VCS sector has a useful role in providing specialist training and aiding the identification, assessment and recovery of trafficked young people. VCS sector involvement in trafficking sub-groups strengthens links into the community and helps build public awareness of trafficking.
- Pilot authorities had a low-to-moderate level of awareness of the NRM but felt it had 'put trafficking on the map' locally and nationally.
- Pilot authorities are engaging with the NRM: 47 cases of suspected child trafficking were referred by eight pilot authorities. Local authorities require much more support from other agencies when undertaking their first few NRM referrals. Clarity is needed on when the referral should occur and how much information to provide. Pre-referral multi-agency meetings and a shared multi-agency decision *at the point of referral* was found to be very useful.
- Some pilot authorities are questioning the additional benefits of the NRM to children, especially where asylum-seeking children have been granted leave to remain or where a negative reasonable or conclusive grounds decision is at odds with a positive determination of trafficking by Children's Social Care.
- The CA process is not seen to work as well as it could, with concerns that reasonable and conclusive grounds decisions are sometimes made from a definitional,

bureaucratic perspective and can lack consistency across cases with similar profiles. Timescales are not always met, feedback to local authorities can be slow, and concern exists that the CA at times disregards local authority information submitted with the NRM referral. Pilot authorities would like current good practice in some local areas to be more universal; some competent authorities need to be more engaged, proactive and responsive, and to provide regular case-by-case feedback for each NRM referral.

- Cross-boundary cases of child trafficking are difficult to manage when they involve partner local authorities that have limited awareness of child trafficking and lack specialist safeguarding capacity. Child trafficking is a new area of child protection for most local authorities in the UK, and a national safeguarding-focussed child trafficking body with a coordination function could help local authorities to better safeguard these cross-boundary cases.
- Practitioners would like more guidance on how to work with trafficked children to enhance their recovery. Safe and secure accommodation for child victims was identified as a critical element of the care package, providing an environment where trust could be built with child victims and fear could be reduced – a key 'pull factor' for child victims who go missing from care and return to their trafficker or trafficking network.
- Pilot authorities are developing innovative good practice through trial and error and a need exists to capture this work and disseminate it more broadly to other boroughs.

## Summary of recommendations

### Recommendations for immediate action (adapting the delivery of existing services and plans)

1. The London Safeguarding Children Board ('the London Board') supplementary guidance should refer readers to CEOP data on child trafficking and other publications that detail regular trafficking trends and profile updates.
2. The supplementary documents should include guidance on how to incorporate the trafficking assessment form into existing ICS systems used by UK local authorities.
3. London Board guidance should encourage agencies to gather information from a potential child victim in a single holistic interview that suits a number of purposes (eg child protection, asylum claim, law enforcement).
4. The London Board should feed recommendations of this report into the 2011 UK anti-human trafficking strategy development and review process.
5. Competent authorities should ensure they have full information from referrers and/or local authority safeguarding children teams before making reasonable grounds decisions on suspected cases of child trafficking.
6. UKBA to provide full information to children's social care to aid risk assessment and determination of trafficking concerns. UKBA to attend initial case conferences/strategy meeting or provide written case information where attendance is not possible.
7. Local authorities to consult with competent authorities before and as part of the NRM referral process.
8. Competent authorities to be invited to case conference/strategy meetings where NRM referral has been made. Competent authorities to be notified of ongoing case conference/strategy meeting outcomes and actions to inform reasonable and conclusive grounds decisions under the NRM.
9. Competent authorities to consult with local authorities before making a reasonable grounds decision.
10. Regional UKBA safeguarding leads to be notified in all instances when a request to competent authorities to attend case conference/strategy meeting has been made.

### Medium-term recommendations (additions to existing services and practice)

11. Local safeguarding children boards (LSCBs) should consider establishing child trafficking subgroups or incorporate trafficking into existing subgroups in each local authority area.
12. Local authorities should consider nominating a child protection professional as lead worker in all child trafficking cases in recognition of the fact that child trafficking is child abuse.
13. London Board to create and publish a condensed practitioners' field guide of the guidance and tools contained in the London Trafficked Children Toolkit (that

highlights the importance of the 'golden hour' in rapidly safeguarding trafficked children).

14. LSCBs should ensure that staff are appropriately trained to respond to suspected cases of child trafficking, eg through the development and delivery of multi-agency child trafficking training courses as part of LSCB training programmes.
15. London Safeguarding Children Board Child trafficking monitoring group ('the monitoring group') should promote the development and delivery of a national training programme on child trafficking that can be delivered locally to a multi-agency audience (eg ECPAT UK training programme).

### **Longer term recommendations (implementation of new arrangements)**

16. London Board to establish a virtual support group to assist LSCBs implementing the guidance and toolkit locally, made up of volunteers from the pilot boroughs. This group should be available to answer any questions that may arise as LSCBs begin to work through the toolkit, and to offer advice from their own experience.
17. LSCBs should encourage the development and publication of joint protocols between local authorities and other agencies in each local authority area for identifying and responding to child trafficking cases.
18. In recognition that issues with effective cross-boundary working can considerably hamper the protection of trafficked children, the monitoring group should work with central government to consider the potential for a national body to coordinate responses in these cases.
19. The monitoring group should promote the monitoring and evaluation of future local, regional and national developments and policy responses to child trafficking.
20. LSCB should consider putting in place a comprehensive evaluation framework to accompany the revised toolkit and guidance, continuing to identify developing best practice in working with trafficked children and to inform future amendments to the guidance as the evidence base develops.

## 1. Introduction

### 1.1 The London Trafficked Children Initiative

1.1.1 In the context of the UK Government's ratification of the Council of Europe Convention on Action against Trafficking in Human Beings in December 2008 and its implementation from 1<sup>st</sup> April 2009, the London Safeguarding Children Board (London SCB) launched the *London Trafficked Children Initiative* in January 2008, an 18-month project that aimed to:

- a) Develop and share good practice in local safeguarding responses to trafficked children for London local safeguarding children boards and their partner agencies.
- b) Assist the integration of national trafficked children mechanisms with existing safeguarding children procedure and practice.
- c) Contribute to the redrafting of the 2006 London Child Protection Committee Safeguarding Trafficked Children Guidance incorporating learning from the 2009/10 pilot project.

1.1.2 In pursuit of these aims, the London SCB developed the *London SCB Trafficked Children Toolkit 2009* to provide guidance and tools for local multi-agency responses to trafficked children. From January 2009 to May 2010 twelve local authorities across the UK agreed to pilot the toolkit: Camden, Croydon, Glasgow, Harrow, Hillingdon, Hounslow, Islington, Kent, Manchester, Slough, Solihull and Southwark. In March 2010 the pilot phase was completed.

1.1.3 In June 2009 the London SCB Child Trafficking Pilot Toolkit Monitoring group was set up to monitor the implementation of the Toolkit pilot phase across the 12 local authorities. Membership of the group fluctuated over the period of the monitoring but included the following.

- London Safeguarding Children Board Trafficking Sub-Group (Chair)
- Representatives from the pilot local authorities
- Child Exploitation and Online Protection Centre (CEOP)
- United Kingdom Human Trafficking Centre (UKHTC)
- Metropolitan Police Service
- UK Border Agency (UKBA)
- UK Home Office Victims Unit
- ECPAT UK (End Child Prostitution, Child Pornography and the Trafficking of Children for Sexual Purposes)
- NSPCC-CTAIL (National Child Trafficking Advice and Information Line)
- NRUC (National Register for Unaccompanied Children)
- Anti-trafficking monitoring group

1.1.4 The monitoring group's remit was to maintain an overview of the use of the assessment framework provided by the toolkit, and feed back to relevant national and local agencies any issues that could impact on best practice. Recommendations were to be made to the London Safeguarding Children Board trafficking sub-group.

- 1.1.5 This monitoring report presents the experiences of the 12 pilot local authorities, and three corresponding police forces, in implementing the London SCB Trafficked children toolkit from January 2009 to May 2010. The monitoring group was not tasked with assessing the implementation of the National Referral Mechanism (NRM). However, as the toolkit provides guidance on the NRM and includes the NRM referral form, it is to be expected that views on the NRM were shared by local authorities, and these views are included here.

## **1.2 Methodology**

- 1.2.1 The monitoring process was designed to identify the parts of the assessment framework in the toolkit that facilitated or hindered the identification, assessment and support of trafficked children. Pilot local authorities were asked to not make any unilateral changes to the framework or other tools during the period of monitoring. The findings of the group were to inform the ongoing development of the London Safeguarding Children Board Supplementary Procedure on Safeguarding Trafficked Children – the basis of the national guidance for trafficked children in the UK.

## **1.3 Data collection**

- 1.3.1 The primary method of data collection for the formal monitoring process was three short questionnaires for the local authorities, and one for the relevant police forces. Statistical data was to be made available to the group by the UKHTC on the numbers of children referred to the NRM during the monitoring period.
- 1.3.2 Following the successful input of a multi-agency focus group in Glasgow towards the monitoring process, it was decided to replicate this method of data gathering nationally. A national monitoring workshop was organised where all single points of contact and one other worker were invited to share their local experiences of using the toolkit. Ten pilot local authorities participated.
- 1.3.3 Overall, data was gathered from a number of sources to triangulate evidence, over a period from April 2009 to July 2010.
- Local authority monitoring survey 1 – qualitative information about use of the toolkit
  - Local authority monitoring survey 2 – quantitative data about use of the toolkit
  - Local authority toolkit survey – ratings on 16 tools and guidance in the toolkit appendices
  - Police survey circulated to police forces in pilot boroughs
  - National monitoring workshop hosted by London SCB for Children's Services' professionals from 10 pilot authorities involved in identifying and safeguarding trafficked children
  - Multi-agency workshop for professionals involved in identifying and safeguarding trafficked children in Glasgow
  - Statistical data from United Kingdom Human Trafficking Centre (UKHTC)
  - Various policy documents

## 1.4 Limitations of this report

- 1.4.1 A few authorities and agencies, statutory and non-statutory, within the UK were involved in using elements of the toolkit during the pilot period but were not formally part of the pilot project. While their experiences are not included in this report, their feedback has been captured by the monitoring group and examples of good practice will be included in the London SCB supplementary guidance.
- 1.4.2 Resources and time did not permit a full formal evaluation of the assessment framework that would have allowed the views of other stakeholders, including children, to contribute to the work. The focus on the monitoring of the assessment framework and toolkit necessitated reduced attention on the NRM process itself, although this has been the subject of a Home Office 6- and 12-month review and an analysis of its first year of implementation by the non-governmental Anti-Trafficking Monitoring Group.<sup>1</sup> However, the need for more evidence on the effectiveness of new measures to safeguard trafficked children and the ever-evolving, complex nature of trafficking require rigorous monitoring and evaluation – at the local, regional and national level – of future developments in policy and practice.
- 1.4.3 Five local police services responded to the police survey. While comment is made on their responses in section five of the report they may not be representative enough of police involvement across the 12 pilot authorities to inform the overall findings. The relatively low number of police responses perhaps reflects a general view amongst pilot authorities that it can be difficult to consistently engage police in the case meeting process to address trafficking concerns. Staff turnover in local police services has been identified as a contributory factor and it is possible that in some cases the police may see their role as limited to a particular stage of the investigation process. However, the police responses indicate that if they are involved in implementation of a trafficking response from the outset, overall engagement and joint working is improved – providing some evidence of the importance of multi-agency buy-in.

## 1.5 Baseline level of local authority trafficking experience

- 1.5.1 Pilot local authorities had varied levels of experience of child trafficking prior to joining the pilot project. This included:
- Two authorities with ‘very limited’ experience where trafficking was not recognised as a significant issue.
  - Three port authorities with substantive child trafficking concerns gained over several years of working with newly arrived young people, especially unaccompanied asylum-seeking minors.
  - Three non-port local authorities with two or more years of experience, mostly in their unaccompanied minors teams, including a major two-year operation to identify, trace and safeguard missing and trafficked children.
  - Two authorities with a prior focus on trafficking for sexual exploitation.
  - One authority with a high level of trafficking awareness in asylum services through specialist training and participation in the 2006/07 CEOP strategic threat assessment (Child trafficking in the UK).

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<sup>1</sup> Anti-Trafficking Monitoring Group (2010) Wrong kind of victim? One year on: an analysis of UK measures to protect trafficked persons.

## 2. Initial stages of toolkit implementation

- 2.1 The pilot project was approved at senior levels in almost all pilot authorities. Children's Services teams led the implementation of the toolkit in eight local authorities (eg unaccompanied minors team, fostering team, referral and assessment, child in need team, unaccompanied asylum-seekers team, leaving care team, quality assurance, duty and assessment, 16+ care team) sometimes in partnership with the police (the child abuse investigation team and/or public protection desk).
- 2.2 Six local authorities created a child trafficking steering group or sub-group, at least three of which were multi-agency. Two local authorities had a well developed multi-agency approach that included the PCT, police, education, legal centres and VCS organisations.
- 2.3 Overall however, pilot local authorities were at different starting points when implementing the toolkit (and remain so) which led to anti-trafficking responses being developed at different rates. The issue of unaccompanied minors is not always well understood, expressed by one local authority as '*...any child with a foreign name goes to the asylum team*'. Trafficking is often seen as the remit of one team, with the responsibility to train others and to decide whether to pick up trafficking cases that are not within their core business. Both asylum and non-asylum teams can be expected to identify trafficking in cases outside their remit. This can be a child protection risk where a case sits with a team that lacks the skills to identify trafficking. Knowledge and expertise is often stronger in unaccompanied asylum-seeking children (UASC) and asylum teams than other social work teams, leading to 'pockets' of experience and toolkit use in each pilot local authority. Many pilot local authorities compared trafficking to other child protection issues such as domestic violence and child abuse, where extensive training is needed to build professional acceptance of the issue and the skills to respond to it.
- 2.4 It takes a considerable time to build a 'level playing field' across local authorities in their capacity to implement the toolkit, which meant that pilot local authorities felt it was important to carefully consider who should lead the toolkit implementation process. Seniority is crucial, with senior operational management on trafficking steering groups highly recommended along with a designated local safeguarding children board (LSCB) lead on child trafficking to support the multi-agency strategic response. Local champions also play a key role in the effectiveness of local arrangements. But a champion cannot drive the process alone and if they leave their post their local authority's knowledge base and commitment may decrease.
- 2.5 Two local authorities have created specialist trafficking posts including a specialist social worker, a senior practitioner and a child trafficking lead professional. Many local authorities felt that specialist frontline posts are needed, as with other child protection issues dealt with on a daily basis, eg child sexual abuse. These could include a designated Children's Services senior practitioner (child trafficking). Where a strategic lead may be in place, it was suggested they could work alongside a specialist team to provide 'a fresh pair of eyes' on cases, but should not have their own caseload.

### **3. Awareness and understanding of trafficking**

#### **3.1 Challenges faced by local authorities**

3.1.1 Many pilot authorities are finding identification of trafficked children a major challenge, in a context of very low levels of public awareness and resistance from some child protection professionals to acknowledge that 'these things happen here'. Pilot authorities view trafficking as an issue that needs constant 'renewal' in the professional and public mind to ensure it is as well understood and acted upon as other child protection issues that were once also 'new' and not taken seriously (eg child sexual abuse and domestic violence).

3.1.2 Pilot authorities reported the following concerns around professional awareness of trafficking:

- Catch-all assumptions amongst staff that 'a foreign name equals trafficking'. Assumptions that children in the UK are here legally and that 'somebody else' has checked that they are being adequately looked after and safeguarded. It was suggested a more questioning approach is needed across all agencies at potential initial points of contact to challenge assumptions around child trafficking and attitudes to separated and potentially trafficked children.
- Limited dissemination, or digestion, of information about the Council of Europe Convention on action against trafficking in human beings and its implementation via the NRM by frontline professionals most likely to come into first contact with a child. Awareness of the NRM and the competent authority (CA) was low or very low in five of the pilot authorities, while another five were moderately aware of the process. The experience of one local authority that launched a trafficked children protocol at a Local safeguarding children board conference on trafficked children suggested that greater awareness can follow measures such as these.
- Some pilot authorities feel that frontline experience suggests trafficking is not necessarily a definite or clear concept, especially with young children.

3.1.3 Pilot authorities felt that building public awareness on how to recognise and respond to child trafficking was very important and that information in the toolkit was useful for developing public campaigns. However, they lack resources to do so, and face difficulty in getting senior level approval for community campaigns on trafficking.

#### **3.2 Training provision**

3.2.1 All pilot local authorities conducted some degree of training and/or awareness-raising on child trafficking during the pilot period, comprising:

- In-house frontline training including 'mini-trainings' and assistance with joint working and briefings (five local authorities).
- LSCB training in three local authorities, one of which was multi-agency
- Specialist training, ranging from discussions with senior managers to basic and advanced level courses for members of Children's Services and Housing (commissioned by four local authorities).

- VCS sector-led training delivered to one local authority, and training for local VCS groups provided by another local authority.
- Single-agency training in two local authorities, including training for groups from the health sector (such as school nurses), hospitals (A&E and Children's ward) Children's social care, social workers, Children's asylum team, Housing, Education and the police.
- Development and implementation of multi-agency training in three local authorities, with more training planned by at least one of these boroughs.
- Production and distribution of leaflets or posters by three local authorities to train staff and raise staff and general public awareness.

### 3.2.2 Training was provided to a range of teams including:

- Children's Services/Asylum: Referral/Duty and assessment, Children in need, Children looked after, UASC, Fostering, Common assessment framework (CAF) coordinators, Leaving care team, Leaving care 16+, Children's residential and resource centres, Out of hours duty social workers, Asylum intake/casework/transition teams, Children in care
- Environment/Housing: Housing officers, housing associations, Environmental health, Licensing
- Education/Health: health visitors, school nurses, hospital accident and emergency and children's ward, designated child protection teachers, designated child protection nurse and team, health and culture, children with disabilities
- Police: Child abuse investigation team (CAIT) and public protection desk (PPD)
- VCS: Children's rights service

3.2.3 Many local authorities lack funding to commission specialist external trainers and the need to develop internal training can lead to delays in training delivery and consequent identification of trafficked children. Trafficking may also be seen as the remit of one team who then have to train others, which can be resource intensive. Duty teams are noted as sometimes being difficult to engage in trafficking training.

3.2.4 Where training is delivered at different levels, social workers often only do introductory level training. This training often does not involve instruction on the toolkit, including how to use the risk assessment matrix for children who may have been trafficked or the trafficking assessment form. This can be a particular problem where the introductory level is general safeguarding training that lacks comprehensive trafficking content.

3.2.5 It was evident that more training and awareness-raising are needed across all local authorities to build frontline awareness and skills and build ownership of the toolkit by the right teams and levels of management. Pilot authorities suggested that frontline and first responder services, such as housing, education and A&E, should be prioritised, as these services see children first and need to be alert to the indicators and presentations of trafficking. This call for a broader training and awareness-raising programme has been repeated in various reports as professionals struggle in understanding and awareness of trafficking in the UK, which can impact on initial identification.<sup>2</sup> A proposal that the Department for Education establish a national

<sup>2</sup> Pearce J, Hynes P, Bovarnick S (2009) *Breaking the Wall of Silence: Practitioners' Responses to Trafficked Children and Young People* London NSPCC [www.nspcc.or.uk/inform](http://www.nspcc.or.uk/inform)

training scheme, ensuring consistency of delivery across the country, achieved widespread consensus amongst pilot authorities. In the short term, should it not be possible to implement a national scheme within the next 12 months, local authorities should be encouraged to collaborate and share costs when commissioning external specialist training providers.

## 4. Identification and assessment

### 4.1 Summary of identification during pilot period

- 4.1.1 Nine out of the ten pilot authorities who responded to the monitoring surveys identified at least two cases of suspected child trafficking during the pilot project – 56 cases in total. Of these 56 cases, 47 cases were referred to the NRM by eight pilot authorities. This compares to 179 referrals of suspected child victims of trafficking made to the UKHTC by first responders between April 2009 and March 2010.<sup>3</sup> In three cases (two authorities) the decision was made to *not* refer the case to the NRM following use of the assessment framework.
- 4.1.2 An innovation to note is that some local authorities are using the toolkit in conjunction with the CEOP strategic threat assessment to help identify trafficked children. Two councils use information from both sources as well as local statistics to profile and identify children at risk of going missing and/or being trafficked. They then implement the 'Guidance on good practice for trafficked children' to reduce this risk. It should be noted however that only about half of the pilot authorities had heard of the CEOP strategic threat assessment.

**Good practice** One local authority undertakes the trafficking assessment only after implementing good practice measures to reduce the risk of a child going missing. Since using the good practice guide, the authority no longer places children at risk of being trafficked in shared homes without a foster carer.

- 4.1.3 A number of local authorities suggested publication of 'profiling' information in the guidance part of the toolkit or in some other form of regular communication, though concerns were raised about whether it would always be correctly interpreted and how it would be kept up to date. It should be noted that while information on child trafficking trends is a potential source of help to local authorities, there are significant problems associated with 'profiling' when children are from so many countries and backgrounds.<sup>4</sup>

### 4.2 Overall rating of toolkit guidance and tools

- 4.2.1 The 12 pilot authorities were asked to rate each section of the toolkit according to how useful the guidance and tools were in building awareness or developing new policies, procedures or practices.

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Somerset C (2004) Cause for Concern? London Social Services and Child Trafficking London, EPCAT UK

<sup>3</sup> UKHTC (2010) National Referral Mechanism Statistical Data April 2009 to March 2010. First responders comprise the police, UKBA and Local authority Children's Services.

<sup>4</sup> Brennan D (2005) 'Methodological challenges in research with trafficked persons: lessons from the field' in Laczko F and Gozdzik E (eds) *Data and Research on Human Trafficking: A Global Survey* International Organization Migration <http://www.nswp.org/pdf/IOM-GLOBALTRAFFICK.PDF>

#### 4.2.2 Reactions to the guidance section were mixed.

- Almost all local authorities found the first four sections of the guidance at least 'useful' – *Introduction, Definitions, Principles, The problem of child trafficking*.
- Five local authorities found the following three sections 'very useful' or a 'must-have': *The problem of child trafficking, Children at risk of or experiencing significant harm, Particularly vulnerable groups of children*.
- Three local authorities also rated *Safeguarding and promoting the welfare of trafficked children* as a 'must-have'.
- Seven sections of the toolkit were either not used or rated as 'slightly useful' by more than one local authority: *Introduction, Actions of professionals and agencies, Local expertise in relation to trafficked children, Safeguarding and promoting the safety of trafficked children, Information sharing, Role of Local Safeguarding Children Boards, Role of specific agencies and services*.

#### 4.2.3 The 16 tools and guidance items in the toolkit appendices<sup>5</sup> were on the whole favourably regarded.

- All appendices were a 'must-have' for at least one authority.
- The *Risk assessment matrix* was the most useful tool – a 'must-have' for eight authorities, and 'very useful' or 'useful' for four others.
- The *Assessment framework for trafficked children* triangular diagram was the next most useful tool – a 'must-have' for six local authorities, and 'useful' or 'slightly useful' to six others.
- The *Trafficking assessment* form was rated 'useful' or 'very useful' by seven pilot authorities, and 'must-have' for two others.
- The *Quick guide to levels of intervention* and *Quick referral flowchart* were least useful, rated by five authorities as 'slightly useful' or 'not used'. Some pilot authorities suggested localised referral charts adapted to their own processes were more useful, and that they were developing these themselves.
- One third of the pilot authorities were not using the *Quick guide to levels of intervention*, while one quarter were not using the *Quick referral flowchart*, the *Flowchart for safeguarding a trafficked child*, and the *Child trafficking referral checklist*.
- At least one local authority was not using the tools *Policy and legislation*, *Glossary and acronyms* or the *Assessment framework for trafficked children*.

### 4.3 Guidance

- #### 4.3.1
- The guidance is perceived as very comprehensive, informative and good to 'dip into' with the added benefit of being downloadable, but is also considered to be bulky, dense and too long. Not all authorities are using it, and within those that do some social workers and teams find it more useful than others. Many social workers lack the time to read it and consequently tend to skip the main guidance to use the tools in the appendices. A condensed version would be more likely to be used.

<sup>5</sup> Appendix 6 'Competent authority considerations' was not complete at time of monitoring and so was excluded from the survey

**Good practice** One local authority has developed a condensed version of the guidance as part of setting up a working agreement with airport and police, and based their multi-agency Memorandum of Understanding on it.

4.3.2 The toolkit is considered to provide good guidance on the identification of young people on arrival. More clarity is required, however, on what to do when suspicions arise when a young person has been in care for some time, or when there are ongoing suspicions of trafficking and exploitation. Pilot authorities also wanted more guidance on how to help young people recover from trafficking (see 7.4).

#### 4.4 Risk assessment matrix for children who may have been trafficked

4.4.1 There was widespread agreement that the risk indicator matrix is an extremely useful tool, used widely by teams familiar with the toolkit (often UASC teams). It can be quickly and easily applied to other intake teams, especially those dealing with trafficking less often, who have the will to engage with trafficking and use new tools but lack time to go through the toolkit comprehensively.

4.4.2 One local authority raised the concern that the risk indicators may not be suitable for identification of child trafficking victims under ten years old. Another local authority noted that negative reasonable grounds decisions within the NRM referral process have mainly been for younger children.

4.4.3 The importance of keeping the indicators matrix up to date was also raised, with the question of when and how the matrix might be revised. At the time of this research however, none of the ten pilot authorities who answered the monitoring survey had noted any additional indicators.

#### 4.5 Trafficking assessment form

4.5.1 The trafficking assessment is a comprehensive and useful tool for some practitioners, who use it to focus their thinking on trafficking, especially when new to the subject. It has contributed to identification of trafficked children during the pilot project in half of the cases.

- Seven local authorities used the assessment form to assist their decision making *before* making a NRM referral (28 out of 47 cases referred to the NRM).
- Three local authorities also used the assessment form *after* the NRM referral to inform ongoing safeguarding decisions in nine of these 28 cases.

4.5.2 However, the assessment is also often seen as an unnecessary, lengthy, repetitive and additional to the rigid Integrated Children's System (ICS) assessment process (eg initial and core assessments). Some local authorities lack time to complete it and do not use it even where they know they can just use sections, rather than the full assessment (only three local authorities always use the full assessment). There was concern that local authorities cannot sustain the knowledge base required to successfully train staff to complete such a 'complex assessment'. There is also a view that the assessment may not be needed where initial/core assessments are carried

out well by highly trained and experienced practitioners. However, the complexities of child trafficking were also noted, with some recognition that it may currently be one of the most challenging areas of child protection work. The comprehensive nature of the assessment form reflects this complexity, though this should not result in repetition. It is also recognised that initial and core assessments do not currently include trafficking as a specific risk issue, and without a robust training model, knowledge would be insufficient to identify trafficking concerns.

**Good practice** One local authority where children have not been identified and have then gone missing after the trafficking assessment has been undertaken too slowly is trying to incorporate some trafficking assessment questions into their age and initial assessments which need to occur within seven days.

- 4.5.3 Although the trafficking assessment is ICS-compliant, not all pilot authorities know how to integrate it into their local ICS systems. This has led to the assessment being kept separate from other safeguarding/child protection assessments in some boroughs, which potentially weakens the link between existing assessment pathways. This may create a safeguarding risk where a trafficking assessment is not an outcome of those assessments, as trafficking issues, indicators and risks can be missed.
- 4.5.4 There is a concern that the risk assessment matrix, not the assessment form itself, is used by some local authorities in some instances as the specialised trafficking assessment. This may relate to the perception that the assessment framework is too long, repetitive and overly complex, and to the fact that some social workers do not remember to use the assessment form. There was also some concern that even prior to beginning the assessment process a certain level of knowledge and awareness is needed to recognise trafficking as a possibility. This indicates that in some local authorities, social workers' awareness of the toolkit and local/national procedures and guidance may not be sufficient to fully support identification and assessment. Merging the trafficking assessment framework with the existing national safeguarding assessment framework may simplify the assessment process and be beneficial to local authorities.
- 4.5.5 The introduction of a lead child trafficking safeguarding coordinator in the Children's Services department of each local authority could greatly assist identification of trafficked children as the coordinator could coordinate the safeguarding response using a multi-agency approach.
- 4.5.6 Many NRM referrals are made using just the risk assessment matrix, with the trafficking assessment being completed only after the NRM referral. Where this occurs local authorities are concerned that information collected in the trafficking assessment is not being properly considered by the CA as the information exchange process within the 45-day reflection period is not currently working well. Some practitioners viewed the NRM process as covering only the 'core' trafficking issues, which did not take into account the fuller issues captured by the trafficking assessment.

#### 4.5.7 Several reasons for not always using the full assessment were identified.

- Pilot authorities have learned from experience which parts they need to use, though they prefer to do a full assessment to 'understand the full complexities and risk' when working with less experienced agencies.
- Some sections are not considered relevant, eg names of people escorting children on their own, name of the carer when many are in local authority care, notes on foster home routines and expectations that would be more applicable to children within households.
- All children referred to UKHTC have either made immediate disclosures of trafficking or have been referred by UKBA to the local authority after raids on sites of exploitation, eg factories.
- Some questions are closed and repetitive and are seen as additional to other assessments already completed by social workers, although experienced social workers can reduce repetition by customising the assessment framework for a particular situation.

## 4.6 Age assessment

### 4.6.1 The COE Trafficking Convention guidance on age assessment (Article 10(3)) stipulates that:

When the age of the victim is uncertain and there are reasons to believe that the victim is a child, he or she shall be presumed to be a child and shall be accorded special protection measures pending verification of his/her age.

### 4.6.2 The issue of age assessments remains controversial for social work child protection and asylum teams, a finding of the monitoring group that reflects much recent research.<sup>6</sup> Pilot authorities felt strongly that decisions about age are best made through social interaction and social work assessment. Various views were expressed as to whether age assessments should be carried out on all young people presenting as trafficked or not, unless there were medical reasons to do so.

## 4.7 Use of National Register for Unaccompanied Children database (NRUC) in assessment process

### 4.7.1 All local authorities were aware of the National register for unaccompanied children. Five local authorities had used the NRUC database as part of their assessment process and found it useful in providing required data and to locate or confirm if a child's family members were in the UK. Several authorities suggested that if UKBA, police and all local authorities used the database for the purposes intended, it would have been an extremely useful tool to track missing children across the UK. It had the potential to facilitate information sharing around trafficking profiles and networks operating locally and across the UK, and the capacity to include enhanced biometric data and facial recognition software.

### 4.7.2 It should be noted that the NRUC database was closed down in May 2010.

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<sup>6</sup> Anti-Trafficking Monitoring Group (2010) *Wrong Kind of Victim? One year on: an analysis of UK measures to protect trafficked persons* London, Anti-Trafficking Monitoring Group  
Crawley H (2007) *When is a Child not a Child? Asylum, Age Disputes and the Process of Age Assessments*, Immigration Law Practitioner's Association

## 4.8 Impact of trafficking assessment process on child

*'I'm sure if I ended up in Kabul and had to tell my life story it'd take a damn sight more than 35 days even if I was a kid'*, Local authority social worker

- 4.8.1 The assessment of suspected trafficking victims has the potential to subject young people to numerous extensive and repetitive interviews with police, lawyers, UKBA and social workers. This can be intrusive and traumatic and risks *'embroiling children in an abusive system'* which could potentially retraumatise them.<sup>7</sup> It was felt that multiple assessments can confuse a child and lead to only a partial disclosure that matches the focus of the assessment, an inconsistency that can lead agencies to disbelieve the child. Some local authorities feel that information gathering should be more streamlined (possibly with a single, initial, holistic multi-agency interview) and that the NRM should not involve extra interviews.

**Good practice** One authority has had strong support from the police in using a Joint interview technique (JIT) style interview to facilitate immediate child protection where trafficking is suspected. It can be time-consuming and does not address longer term issues around 'drip-by-drip' disclosure, but has a key benefit of avoiding retraumatization of the child that can follow multiple interviews in the immediate aftermath of being trafficked.

- 4.8.2 Short timescales for assessments do not recognise the complexities of disclosure and a focus on timescales can also reduce the quality of the assessment and impact on child safety. Child sexual abuse, for example, can take years to disclose yet trafficked children are expected to make a rapid disclosure. High levels of grooming by traffickers can lead to children giving information that seems good but is incorrect, and some children do not ever deviate from their initial story. Some local authorities report it takes four to five weeks to do a trafficking assessment while others *'may not get the truth for two years'*. Social workers can lack the time to develop the close relationship required to encourage disclosure. One local authority works closely with a VCS social worker to build trust with the child, while Children's Services conducts the assessment later. Another local authority stops the assessment process if the child is distressed, with the team manager, not the social worker, taking responsibility for the decision.
- 4.8.3 It was reiterated that at the first sign of indicators, suspicions or concerns, professionals should make immediate contact with other agencies as per child protection guidelines. Professionals should not wait for full disclosure, as it may not come. But frontline experience shows that additional information nearly always comes to light after initial investigations. Practitioners find it difficult to then change initial assessments and are very concerned about cases where disclosure takes several months and it is too late to alter the assessment under the NRM.
- 4.8.4 Some pilot authorities also felt assessment processes 'silo' or 'ring-fence' children, labelling them as separated, smuggled, trafficked, facilitated and so on. Following the initial assessment, and as more information becomes available, there was some concern that once labelled it is often difficult to incorporate contradictory evidence into

<sup>7</sup> Brennan D (2005) 'Methodological challenges in research with trafficked persons: lessons from the field' in Laczko F and Gozdziaik E (eds) *Data and Research on Human Trafficking: A Global Survey* International Organization Migration [www.iom.int](http://www.iom.int)

ongoing assessments as workers may be reluctant to alter initial assessments. This reluctance to alter assessments has been identified previously and labelling children may result in differential service provision if child protection concerns are not to the fore.<sup>8</sup> Pilot authorities emphasised that professionals from all agencies should be willing to change assessments and decisions in light of new information.

## 5. Multi-agency working

- 5.1 Pilot authorities report that effective multi-agency working takes a longer time to develop than may be required to accurately assess and refer a child within the timeframes provided by the NRM (eg 45-day reflection period). While NRM guidance refers to the need for close multi-agency working over time to identify trafficked children, in practice some pilot authorities felt some of their working relationship with UKBA, for example, was a *'one-way conversation'*. Local authorities felt the need to *'chase'* UKBA at times, as UKBA can be slow to respond to information requests, with a long *'feedback vacuum'* after a NRM referral. They note that UKBA is a new partner around the child protection table, where agencies have taken years to become comfortable with a multi-agency approach. Local authorities note that even within current established child protection practice, communication between their own services can be inconsistent. However, they felt it was a reasonable expectation that UKBA should be more proactive, engaged and timely in how it works with local authorities. (Note that UKBA has developed enhanced training for competent authorities and will shortly issue refreshed guidance. Both aim to emphasize the importance of multi-agency working and proactive engagement with NRM First responders including local authorities).
- 5.2 The ability of the trafficking assessment framework to fully support a multi-agency approach is debatable. Some pilot authorities indicated it fully promoted partnership working, with different agencies contributing to its completion and pulling information together: *'The assessment framework as a tool encourages multi-agency approaches to assessment'*. Others reported it barely contributes to joint work, not least because it has not been used enough yet to begin promoting inter-agency working. These divergent thoughts may indicate different experiences of multi-agency working in local authority areas, rather than being a comment on the assessment framework itself.
- 5.3 Overall, a majority of local authorities indicated that children and families teams in social services/child protection are taking the trafficking agenda forward in partnership with other agencies as part of the overall multi-agency response. This suggests that on the whole child trafficking is located within child protection concern in most areas, although a couple of local authorities responded that it was located in the unaccompanied children's team. This practice supports the widely held view amongst pilot authorities that child trafficking is child abuse and should be dealt with under local authority child protection procedures.<sup>9</sup>

<sup>8</sup> Crawley (2007); Taylor C & White S (2006) 'Knowledge and reasoning in social work: educating for humane judgement' *British Journal of Social Work* 36, 937-954;

Gallagher A (2002) "Trafficking, Smuggling and Human Rights: Tricks and Treaties." *Forced Migration Review*, 12, 25-28  
<http://www.fmreview.org/FMRpdfs/FMR12/fmr12full.pdf>

<sup>9</sup> CEOP (2009) Strategic Threat Assessment Child Trafficking in the UK, London, Child Exploitation and Online Protection  
[www.ceop.gov.uk/downloads/documents/child\\_trafficking\\_report0409.pdf](http://www.ceop.gov.uk/downloads/documents/child_trafficking_report0409.pdf)

Kelly E (2009) 'Safeguarding trafficked children' in Hughes L and Owen H (eds) *Good Practice in Safeguarding Children: Working Effectively in Child Protection* London, Jessica Kingsley Publishers

- 5.4 Multi-agency groups such as the local child safeguarding board trafficking sub-group are very useful but can end up being 'multi-agency in name only' without regular attendance by police and/or UKBA where they make an active contribution. Inter-agency protocols can help set expectations between local authorities and other agencies, but must be backed up with training and embedded in local practice. Training is also needed for partner agencies as they are not always picking up on trafficking indicators – although some local authorities were concerned that delivery of this training could be seen as their responsibility. For example, one local authority asked by police to deliver trafficking training to 180 officers recognised the benefits of being able to influence training content, but was not resourced to deliver the training and considered this function to be the remit of the police training unit. Reflecting a general pilot authority view that trafficking is yet to be properly understood as a child protection issue, this local authority noted that it would not be asked to train police on any other child protection issue.
- 5.5 Despite different experiences of multi-agency working, the survey returns indicated a wide selection of agencies had been involved in training events and/or the identification and assessment process across the country. These include social services children and families/child protection/duty and assessment teams, UASC teams, leaving care services, police, education, health, housing, legal services, airport staff and various VCS organisations. This suggests the multi-agency response required to address child trafficking has been acknowledged and acted on in many of the pilot areas.<sup>10</sup> It also supports the toolkit guidance that the PCT and local authority service areas outside Children's Services have a key role to play in the frontline identification of trafficked children, and should be linked into multi-agency trafficking training and safeguarding.

**Good practice** One local authority ensures multi-agency engagement *at the point of NRM referral*, and this was suggested as useful for improving the quality of referrals. (It was suggested however that referrals are still not always accepted by the CA despite multi-agency involvement including a shared decision that a child had probably been trafficked).

- 5.6 The toolkit has been useful in highlighting to police child protection procedures used by local authorities. It has supported the message that child trafficking is a child protection issue, not a general criminal or immigration issue, especially with cannabis factories. It has helped three local authorities to develop a joint protocol with police. Police presence at LSCB trafficking sub-groups and regular attendance at child strategy meetings has been identified as particularly useful. However, many pilot local authorities find it difficult to fully engage police in trafficking cases and get them to act on suspicions, even where the risk indicators matrix is used. The willingness of police to accept some forms of exploitation as trafficking crime (eg domestic servitude or benefit fraud) has been inconsistent in some areas and can depend on the officer involved. Social workers often end up doing in-depth investigation into a case. Clarity is needed around how much of this role should be taken on by social workers versus the police, especially where police involvement is absent or limited. Pilot authorities also felt it is important to agree a joint process with police about when to make a call on when a case is *not* trafficking.

<sup>10</sup> Kapoor A (2007) *A Scoping Project on Child Trafficking in the UK* London, Child Exploitation and Online Protection [http://www.ceop.gov.uk/downloads/documents/child\\_trafficking\\_report0607.pdf](http://www.ceop.gov.uk/downloads/documents/child_trafficking_report0607.pdf)

- 5.7 Several local authorities found the involvement of the VCS sector very useful in the identification and support of trafficked young people. At least two pilot authorities worked closely with VCS workers to implement the pilot project including VCS sector provision of specialist training and of one-to-one and peer support to aid the identification, assessment and recovery of the young person. It was noted that VCS agencies can have specialist knowledge of the ethnic and linguistic background of the trafficked young person and have more time and diverse processes (eg peer groups) to build rapport with trafficked young people. Specialist multi-agency and/or local training has been by ECPAT UK and Barnardos (England and Cymru) and more would have been commissioned by pilot authorities if the resources were available. VCS sector involvement in trafficking sub-groups was also noted as useful as it strengthens links into the community and helps build public awareness of trafficking.
- 5.8 The five police forces that responded to the police survey reported mixed involvement in the development of child trafficking responses and mixed awareness of local authority area involvement in the pilot project. Two police forces did not know that their local authority was participating in the pilot, although all police respondents had some awareness of broader trafficking issues and had attended multi-agency training.
- 5.9 The two police forces that were least involved in implementing a local multi-agency response to child trafficking also had very low awareness of the NRM and local CA. One of these forces also held the view that social services knowledge of trafficking was also limited.
- 5.10 The three police forces that had helped implement the multi-agency response reported a moderate to high awareness of the NRM and CA, and improved multi-agency working in their areas. This included:
- involvement in working groups and policy and procedural developments that they considered had led to improved multi-agency working relationships related to child trafficking
  - involvement in strategy and operational meetings including decision making around child trafficking cases, and liaison with local authority child protection teams and other agencies as a response to trafficking concerns, indicating shared responsibility for trafficking cases
  - involvement of various sections of the force, including child protection specialists.
- 5.11 As with local authority respondents there was clear recognition amongst police that further training would be beneficial to increase knowledge and understanding.
- 5.12 As mentioned earlier, it is not known how representative these police responses are, but there are indications that active involvement from the outset in the implementation of the response to trafficking results in increased awareness and improved multi-agency working and engagement. In the three forces where police buy-in was greater there are indications of positive inter-agency working and developments between police and local authorities. Concerns noted by local authority respondents about a lack of police engagement do not appear apparent in these three boroughs.

## 6. Case conference / child strategy process

- 6.1 Regular child protection processes may be too slow for identification and assessment of potential victims of trafficking, due to the risk of a child going missing before a strategy meeting can be held. More recognition is needed of the very strong pressure traffickers put on children to go missing. Practitioners often struggle to highlight the level of risk involved, and cases are not prioritised in the same way as clear-cut, better understood child protection concerns. Children are sometimes identified as being trafficked only because they disappear within 24 hours. Recognition is needed by all agencies of the challenges faced in safeguarding these children and the importance of the first 'golden hour' in rapidly implementing safeguarding measures for newly identified trafficked children. A faster, more streamlined process is required for trafficking cases where children are at risk of going missing. Given the prevalence of cross-boundary cases, a coordinated regional, or preferably national, process for responding to trafficking is also required. This cross-boundary function is particularly pertinent within the 33 local boroughs in London.
- 6.2 Some authorities report that staff turnover amongst social workers and the transfer of cases between multiple teams during the safeguarding have contributed to delays in assessing cases and safeguarding children, or to assessments being incomplete. In such cases the normal safeguarding process often continues but without sufficient in-depth assessment of factors related to trafficking. This seemed to occur much less in the four local authorities that had a child trafficking safeguarding coordinator/lead, based either in a children's social care team or within the local safeguarding board, who tracked cases from first identification to a NRM referral, and monitored safeguarding actions.
- 6.3 The attendance of UKBA and police at case conferences/child strategy meetings is critical to share information and concerns and to improve the quality of trafficking/risk decisions. Pilot authorities recognised that some agencies found it difficult to attend meetings at short notice but felt all effort should be made to attend, nominate a replacement or provide written information. Local authorities prefer ongoing dialogue, contact and discussion with agencies before and after case conferences. This should include a strategic/policy commitment from all agencies, particularly UKBA, to attend initial meetings where concerns are being discussed so that more informed decisions can be taken at this early stage.

## 7. Safeguarding measures for trafficked children

- 7.1 The *Guidance on good practice for trafficked children* authored by Harrow Council outlines measures to safeguard children suspected of being trafficked. It was developed during the pilot period and circulated to pilot local authorities though it is not formally part of the toolkit.
- 7.2 Implementation of good practice measures in the good practice guidance varies across the pilot authorities. Many authorities lack mechanisms to implement measures other than arranging a placement, and struggle with the 'who' and 'how' of it at the frontline, such as arranging to photograph an at-risk child within 24 hours.

- 7.3 Even where good practice is implemented, local authorities feel highly challenged by the reality that children face enormous pressure from their traffickers to go missing, sometimes before they even have a placement or have even been assessed. The first few hours following contact with a child can be critical to reduce the risk of their going missing.

**Good practice** One local authority is considering setting up a drop-in centre for newly arrived young people, to link those most at risk of going missing or being trafficked with other young people from the same ethnic group in the local community. The aim is to help new arrivals know that they do not have to follow their traffickers' orders.

- 7.4 Pilot authorities suggested that the toolkit should develop a greater focus on recovery work with trafficked young people, including resources and guidance to support them to speak about their experiences. One local authority has secured external funding to carry out this type of work.
- 7.5 A further suggestion is the creation of a national counter child trafficking coordination group, with an identified national lead and responsibilities around strategy, responsibility and practice. This would enable all agencies to work together across local, regional and national boundaries to identify risk issues for children and coordinate a national response to safeguard and protect suspected child victims.

## 8. Resources

- 8.1 The identification and safeguarding of trafficked children has significant resource implications, notably with the large amount of work required at the start of the process and to respond to ongoing complexity. Any rise in trafficking cases will increase the workload of already overstretched and under-resourced services. Upcoming budget cuts to local authority funding will place severe pressure on child protection related to trafficking. Strong concerns exist that child trafficking safeguarding currently exists within a resource vacuum and that policy makers are identifying human trafficking as a high priority without providing extra resources (funding and staff) to undertake specialist safeguarding or to ensure all agencies can meet commitments under the NRM in a timely way.
- 8.2 In addition to resources, specific safeguarding measures (eg long-term external placements for vulnerable young people that enable a local authority to undertake a comprehensive trafficking assessment) also require high-level strategic decision making within local authorities. Pilot authorities feel it would be easier to implement these kinds of safeguarding practices if trafficking were part of service level plans, for example.

## 9. National Referral Mechanism (NRM)

### 9.1 Awareness of the NRM

- 9.1.1 Most local authorities had a low-to-moderate level of awareness of the NRM both before and during the pilot period. However, a number of local authorities felt the NRM has 'put trafficking on the map' locally and nationally, and has contributed to

'tracking' children once referred. They caution that this should be seen as a beginning, not the end, of a national awareness-building process that could help speed up mainstreaming of trafficking as a child protection issue, as has occurred with the issue of child sexual abuse. Suggestions made to progress this included a public awareness campaign, more conferences and seminars for practitioners, and inclusion of trafficking content in degree and college courses.

## 9.2 Safeguarding effectiveness

- 9.2.1 There is little consensus on whether the NRM is working. Some local authorities feel it is not, while others feel it is too early to say as they are still awaiting reasonable or conclusive grounds decisions on cases referred to the NRM.
- 9.2.2 There are concerns about the actual benefits to the child of the NRM process itself, especially where asylum issues are also involved, and that the NRM is often not in the best interests of the child.

*'NRM doesn't feel it is a system that supports young people. Don't see the benefits for children of this additional process'*

*'How does the NRM support the asylum process as unaccompanied children are usually given leave to remain until they are 17 ½ years anyway?'*

Where UKBA is the CA one concern is that it works to different legislation from local authorities – although it is recognised that the new safeguarding duty for UKBA under the statutory Code of practice on keeping children safe from harm has reduced this disparity. This brings UKBA into line with the equivalent safeguarding duty for local authorities in section 11 of the Children Act 2004.<sup>11</sup>

## 9.3 Local multi-agency working

- 9.3.1 There was some disagreement about the extent of multi-agency working around child trafficking, even though the NRM process is predicated on the partnership approach. While two authorities suggested the various parts of the assessment process barely supported multi-agency working, others considered it supported full multi-agency working and that completion of a full assessment necessitated and promoted good partnership working.
- 9.3.2 In one local authority the decision to refer a case to the NRM is made by a multi-agency group at a child protection meeting (including UKBA where possible). However, this authority had concerns that the views of this group do not appear to have much influence on the NRM decision once referrals are made.

**Good practice** One council had a very positive experience of working with the CA within a multi-agency response on several trafficking cases referred to the NRM. The fact that there was a single agency (Children's Services) leading and coordinating the multi-agency team during assessment, safeguarding and referral to the CA was seen as helpful. It meant that all agencies, in real time, were aware of progress, contributed

<sup>11</sup> Children Act 2004, Section 11 requires local authorities and its local partner agencies to make arrangements to ensure that in discharging their functions they have regard to the need to safeguard and promote the welfare of children.

to the assessment and agreed with the decisions and outcomes made. While the CA came in towards the end of the assessment process its contribution was valued. In these cases the children received a positive reasonable and conclusive grounds decision.

## 9.4 Referral process

- 9.4.1 As mentioned in section 4.1.1, 47 cases (out of 56) were referred to the NRM by eight pilot authorities.
- 9.4.2 Most pilot authorities found it daunting to undertake their first NRM referral and there was recognition that engaging with the NRM is an ongoing learning process. Key points include the following.
- There is a lack of clarity about when the NRM referral should occur and how much information should be provided. It was felt that pre-referral multi-agency meetings can help resolve these questions.
  - Much more support is needed than is presently available when undertaking the first few referrals.
  - A single point of contact for trafficking cases at the CA could improve the referral process.

## 9.5 Competent authority process

- 9.5.1 The experience of working with competent authorities (CA) varies across local regions, with some competent authorities being more engaged than others. There was an overall perception amongst pilot authorities that the CA process does not work as well as it could, with some concern that the reasoning behind reasonable and conclusive grounds decisions does not always seem consistent between cases with similar profiles. A number of pilot authorities also feel that the CA has a definitional, bureaucratic perspective and may not appreciate the real impact that a judgement can have on a child's self-esteem and life journey.
- 9.5.2 One local authority has found the NRM process difficult with timescales not being met and that before reasonable and conclusive grounds decisions there is a 'one way' flow of information to the CA. Many local authorities feel that feedback from the CA is slow and needs to be followed up. Pilot authorities want the CA to be more engaged, proactive and responsive, and feel it is reasonable to expect regular case-by-case feedback for each NRM referral.

**Good practice** One council has made a direct link with its local CA, which attended meetings and shared information. The council felt that this made the NRM process more transparent. It was suggested that introducing information-sharing protocols for suspected child trafficking victims would help information to be managed more effectively.

- 9.5.3 There is also increasing concern that little or no discussion is taking place between local authorities and UKBA to support and inform decision making. There was concern from the pilot authorities that the CA had on occasion disregarded the

information they had submitted with the NRM referral. This raised concerns that excessive weight is attached to the asylum interview at the expense of detailed local authority submissions centred on child protection concerns. These concerns reflect the findings of the OSCE report into the implementation of the NRM in the UK where there was concern that the views of the specialist child protection teams often do not count sufficiently.<sup>12</sup>

- 9.5.4 Some pilot authorities also described how negative reasonable or conclusive grounds decisions on suspected cases of child trafficking can make it more difficult to work from a child protection/children and families perspective and these cases may miss out on further investigation. While a negative decision should not halt the 'normal' child protection process, a question exists as to whether a negative decision may impact on subsequent social work intervention as there may be a reduced focus on safeguarding issues from a trafficking perspective.
- 9.5.5 Despite general acknowledgment that in theory the NRM should highlight and raise the profile of child trafficking issues, there is widespread concern that its implementation within a relatively limited policy and research understanding has been compromised. The 45-day reflection period, for example, was considered inadequate and has not always been adhered to by the CA.

*'The 45-day reflection period is not long enough when considering information from victims of trafficking as we know they are told a story to tell and it takes some time to get to the truth about their experiences'*

## 10. Summary of recommendations

### 10.1 Recommendations for immediate action (adapting the delivery of existing services and plans)

1. The London Safeguarding Children Board ('the London Board') supplementary guidance should refer readers to CEOP data on child trafficking and other publications that detail regular trafficking trends and profile updates.
2. The supplementary documents should include guidance on how to incorporate the trafficking assessment form into existing ICS systems used by UK local authorities.
3. London Board guidance should encourage agencies to gather information from a potential child victim in a single holistic interview that suits a number of purposes (eg child protection, asylum claim, law enforcement).
4. The London Board should feed recommendations of this report into the 2011 UK anti-human trafficking strategy development and review process.
5. Competent authorities should ensure they have full information from referrers and/or local authority safeguarding children teams before making reasonable grounds decisions on suspected cases of child trafficking.

<sup>12</sup> OSCE /ODIHR (2009) Background Paper: 2006/07 Review on the Protection of Trafficked Persons in England and Wales [http://www.osce.org/documents/odihr/2009/01/36772\\_en.pdf](http://www.osce.org/documents/odihr/2009/01/36772_en.pdf)

6. UKBA to provide full information to children's social care to aid risk assessment and determination of trafficking concerns. UKBA to attend initial case conferences/strategy meeting or provide written case information where attendance is not possible.
7. Local authorities to consult with competent authorities before and as part of the NRM referral process.
8. Competent authorities to be invited to case conference/strategy meetings where NRM referral has been made. Competent authorities to be notified of ongoing case conference/strategy meeting outcomes and actions to inform reasonable and conclusive grounds decisions under the NRM.
9. Competent authorities to consult with local authorities before making a reasonable grounds decision.
10. Regional UKBA safeguarding leads to be notified in all instances when a request to competent authorities to attend case conference/strategy meeting has been made.

## **10.2 Medium-term recommendations (additions to existing services and practice)**

11. Local safeguarding children boards (LSCBs) should consider establishing child trafficking subgroups or incorporate trafficking into existing subgroups in each local authority area.
12. Local authorities should consider nominating a child protection professional as lead worker in all child trafficking cases in recognition of the fact that child trafficking is child abuse.
13. London Board to create and publish a condensed practitioners' field guide of the guidance and tools contained in the London Trafficked Children Toolkit (that highlights the importance of the 'golden hour' in rapidly safeguarding trafficked children).
14. LSCBs should ensure that staff are appropriately trained to respond to suspected cases of child trafficking, eg through the development and delivery of multi-agency child trafficking training courses as part of LSCB training programmes.
15. London Safeguarding Children Board Child trafficking monitoring group ('the monitoring group') should promote the development and delivery of a national training programme on child trafficking that can be delivered locally to a multi-agency audience (eg ECPAT UK training programme).

## **10.3 Longer term recommendations (implementation of new arrangements)**

16. London Board to establish a virtual support group to assist LSCBs implementing the guidance and toolkit locally, made up of volunteers from the pilot boroughs. This group should be available to answer any questions that may arise as LSCBs begin to work through the toolkit, and to offer advice from their own experience.

17. LSCBs should encourage the development and publication of joint protocols between local authorities and other agencies in each local authority area for identifying and responding to child trafficking cases.
18. In recognition that issues with effective cross-boundary working can considerably hamper the protection of trafficked children, the monitoring group should work with central government to consider the potential for a national body to coordinate responses in these cases.
19. The monitoring group should promote the monitoring and evaluation of future local, regional and national developments and policy responses to child trafficking.
20. LSCB should consider putting in place a comprehensive evaluation framework to accompany the revised toolkit and guidance, continuing to identify developing best practice in working with trafficked children and to inform future amendments to the guidance as the evidence base develops.



**APPENDIX A**

**CHILD TRAFFICKING**

**PILOT ASSESSMENT FRAMEWORK MONITORING**  
**(Local Authorities Questionnaire form 1)**

Date of circulation 25-01-10

Could you please complete the questionnaires as comprehensively as possible (additional comments on areas you think are not covered are particularly welcome).

Thank you for your co-operation.

On completion please return the forms by 12<sup>th</sup> February 2010

<b>LOCAL AUTHORITY</b>	
<b>LEAD PERSON FOR PILOT ASSESSMENT FRAMEWORK</b> <b>(please include contact details as this will be the person approached for follow up interview)</b>	

1. What is the most senior level the pilot project has been approved within your local authority?
1a. How was this approval achieved?
2. Which teams/departments are carrying forward the pilot project in your local authority?
3. What previous experience does your local authority have regarding child trafficking?
4. What has been achieved to date regarding implementation of the pilot project? - please provide details of actions undertaken eg training; dissemination of information; development of policy and procedures; general awareness raising
5. How many teams have been trained on child trafficking and the use of the framework?
5a What are the roles/titles of the teams trained?
6. How many workers have been trained on child trafficking and the use of the framework?
6a What are the roles/titles of the staff trained?

7. How high do you feel awareness of the National Referral Mechanism and the Competent Authority is within your local authority? (please indicate)

very       high       moderately       low       very low

8. Are you aware of the National Register for Unaccompanied Children?

Yes       No

Comments

8a. Have you used the NRUC as part of the assessment process?

Yes       No

Comments

8b How useful has the NRUC been?

9. Have you made changes to the original assessment framework?

Yes       No

9a Could you please describe the changes you have made and explain why you thought they were necessary.

10. Any other comments at this stage?

**APPENDIX B**  
**CHILD TRAFFICKING**



**PILOT ASSESSMENT FRAMEWORK MONITORING**  
**(Local Authorities Questionnaire form 2)**

Circulation date 12-02-10

Could you please complete the questionnaire as comprehensively as possible?  
Additional comments on areas/issues not covered are particularly welcomed.

Thank you for your co-operation.

On completion please return the forms by 5<sup>th</sup> March 2010

<b>LOCAL AUTHORITY</b>	<b>Name:</b>
<b>LEAD PERSON FOR PILOT ASSESSMENT FRAMEWORK</b> <b>(please include contact details as this will be the person approached for follow up interview)</b>	<b>Name:</b>

1. How many referrals have you made to the Competent Authority through the National Referral Mechanism?
<input type="text"/>
2. In how many of these cases was the assessment framework used prior to referral?
<input type="text"/>
3. If the assessment framework is not used prior to referral how are decisions made to refer made/assessed? (indicator matrix/other assessments)
4. In how many of the cases referred to the NRM was the assessment framework used after the referral to inform ongoing decisions?
<input type="text"/>
4. How many suspected child trafficking victims have you NOT referred to the Competent Authority via the NRM?
<input type="text"/>
5. In how many cases was the reason NOT to refer to the NRM made following a comprehensive assessment using the framework?
<input type="text"/>
6. If suspected child trafficking victims have NOT been referred could you please outline reasons behind decision (s) not to refer.
7. How well does the assessment framework complement the child trafficking toolkit?
fully <input type="checkbox"/> reasonably <input type="checkbox"/> barely <input type="checkbox"/> not at all <input type="checkbox"/>
please explain your answer

8. How well do you believe the assessment framework contributes to the National Referral Mechanism process?

fully       reasonably       barely       not at all

please explain your answer

9. How well do you believe the assessment framework contributes to a multi-agency approach to assessing child trafficking?

fully       reasonably       barely       not at all

please explain your answer

10. Overall, what do you consider are the positive aspects of the framework?

11. Overall, what do you consider are the negative aspects of the framework?

12. What changes would you like to be made to the assessment framework?

13. Any other comments about the use of the assessment framework and/or the National Referral Mechanism