



Black Box
Research & Consultancy



Identification of Victims of Modern Slavery: Government Call for Evidence

Written evidence submitted by Black Box Research and Consultancy Ltd, The Children and Young People's Centre for Justice (CYCJ) Scotland and Adam Elliott¹

October 2025

Introduction

This submission is a joint response from Black Box Research and Consultancy ('Black Box'), the Children and Young People's Centre for Justice ('CYCJ') at the University of Strathclyde, and Adam Elliott, a survivor and lived experience advocate of modern slavery.

Overview of Black Box

Black Box Research & Consultancy is a specialist organisation providing expert testimony to the Criminal Courts and Asylum and Immigration Tribunals, with a portfolio of over 700 cases involving both UK and foreign nationals. Our evidence has directly influenced national policy debates, including being cited in the House of Lords during discussions on the Nationality and Borders Bill. Alongside casework, we deliver practitioner training, lead programme evaluations and provide consultancy on modern slavery and child criminal exploitation. We work with local authorities, universities and NGOs to strengthen safeguarding responses and improve victim identification across the UK. More information about Black Box is available at: www.blackboxresearchandconsultancy.com

Overview of CYCJ

The Children and Young People's Centre for Justice (CYCJ) is based at the University of Strathclyde. Our work seeks to improve the outcomes for children at risk of, or currently, in conflict with the law by supporting the workforce, building the evidence base and amplifying the voice of children and young people with lived experience. Our work integrates practice development, research and policy advice across Scotland.

We have been actively involved in supporting practitioners to recognise, understand and respond to the criminal exploitation of children and young people. We co-authored with Action for Children the Criminal Exploitation of Children (CEC), Scotland's Framework for Practice and toolkit launched at the end of August 2025. To support implementation of the framework training was developed and rolled out with six pilot areas to raise awareness and use the included screening tool. There has since been an eLearning module launched to support self-directed learning and widen access to vital training which includes additional resources and information.

Through our engagement with practitioners, policymakers and children and young people themselves, we have unique insight into the challenges posed by current definitions and identification processes for modern slavery and trafficking. This submission reflects our experience working to address this issue for several years at the

¹ This submission was prepared by Dr Grace Robinson (Black Box Research and Consultancy Ltd), Shelley Cathers (Black Box Research and Consultancy Ltd), Daniel Robinson (Black Box Research and Consultancy Ltd), Donna McEwan (Children and Young People's Centre for Justice) and Adam Elliott (Leaders Unlocked).



interface of research, policy, practice and lived experience with a focus on embedding responses in children's rights and child protection principles. More information about the CYCJ is available at: <https://www.cycj.org.uk/>

Adam's Bio

Adam is a 22-year-old lived experience advocate and the founder of *The Long Game*, a prevention initiative raising awareness of county lines, grooming, debt bondage, youth violence and modern slavery. Having been criminally exploited for six years, his personal journey informs his work as a youth justice activist, Inclusion Manager and former Youth Worker. He uses his story to educate young people and professionals, challenge adultification and promote early intervention, resilience and hope. More information about the Long Game is available at: <https://leaders-unlocked.org/projects/the-long-game/>

Summary of the Issue

The rights of children and young people to protection from exploitation, trafficking and modern slavery are being undermined. Current definitions perpetuate barriers to identifying and responding to victims across systems, procedures and practice, resulting in criminalisation, (re)traumatisation and the denial of safeguarding and support. Reframing definitions through a child rights and trauma informed lens is essential. This submission draws on hundreds of such cases, alongside research, training and lived experience, to highlight systemic failings in victim identification and support. We argue for clearer statutory definitions, trauma-responsive practice and a rights-based approach that recognises criminal exploitation as child abuse. Without these reforms, many victims will remain invisible to the very systems designed to protect them.

Q5a. To what extent do you agree with the following statement?

The term 'modern slavery' is helpful for enabling individuals and organisations, such as first responders, police, and support providers, to understand who may be a victim.

Strongly Disagree

Q5b. Why have you chosen this answer?

Children and young people have repeatedly expressed that they do not recognise or identify with terms such as "modern slavery" or "victim." The use of such language is technical, adult-centric, service led and limits the identification process by continuing to use terms that do not resonate with children and young people, or their parents/carers. This creates stigma and distance from services that should be able to help. When children are groomed and exploited, they often see themselves as choosing to act and willingly participate in what they are doing. That belief is part of the strength of the grooming and coercive control processes, where exploiters deliberately manipulate children's sense of belonging and desire for protection. For these children and young people, the word "slavery" has no connection to their lived experience, and they do not see themselves as "victims."



The Slavery and Human Trafficking (Definition of Victim) Regulations 2022 (hereafter the Regulations) are clear that a person's consent does not affect whether they are recognised as a victim of slavery or trafficking. Yet in practice, this truth is obscured when the language used does not resonate with children or the professionals around them. Still, professionals are too often seeing harmful behaviour as "bad choices" or "offending" and placing responsibility on children, rather than being knowledgeable enough to question whether exploitation may be playing a role. Even when exploitation is recognised, the seriousness of the offence can tip the balance towards prosecution. This seems inherently contradictory as on the one hand the child is identified as a victim who cannot legally consent to their own exploitation, and on the other, they are still being held at least partially responsible for the outcomes of that exploitation when it leads to offending behaviour. Clarifying definitions may support earlier and more accurate identification, but unless the wider system including the criminal justice responses are aligned with that recognition, children will continue to be punished for their own exploitation.

Case Study: Adam's Experience of Misidentification

Adam was thirteen years old when he was groomed into county lines drug supply. Over a period of six years, he was subjected to sustained exploitation, including debt bondage, peer-on-peer grooming, and repeated threats of violence. He was forced to transport Class A drugs across the country under the control of organised crime groups, operating under constant threat that he or his family would be harmed if he refused. Violence was a consistent feature of his exploitation: he was attacked, beaten, and intimidated by those who controlled him, both to enforce fabricated drug debts and to ensure his continued compliance.

Despite repeated contact with professionals - including teachers, social workers, police, and youth justice services - Adam's circumstances were consistently misidentified. Each agency saw him primarily as an offender rather than a victim. Instead of being safeguarded, Adam was criminalised, excluded from school, and increasingly isolated from protective support networks. This misidentification not only reinforced his vulnerability to exploitation but also deepened his distrust in professionals.

Adam recalls that across countless meetings with professionals, nobody ever described him as a victim or explained what the terminology meant. This absence left him believing his exploitation was his fault. By the time he was referred into the NRM at the age of 17 - just two months before his final arrest - he was preparing to plead guilty because he never saw himself as a victim of modern slavery. It was only when he met with an expert witness that the term was explained, shifting how he understood his experiences and allowing them to feel validated.

The NRM process itself failed to provide meaningful protection. It took 574 days for a Conclusive Grounds decision to be returned. During this period Adam received no support, safeguarding, or guidance linked to the NRM, and no services were offered even after the positive decision was reached. Instead, he remained in limbo for nearly two years, carrying the trauma of repeated violence, exploitation, exclusion from education, and the ongoing risk of prosecution, without any intervention to address his needs or prevent further harm.

Adam's struggle for justice demonstrates the compounded impact of misidentification, late referral, excessive delays within the NRM and a lack of child-centred language. The failure of multiple agencies to recognise and name him as a victim left him exposed to years of violence, criminal exploitation, and harm. His experience underlines the urgent need for consistent early identification, terminology that children understand, timely decision-making within the NRM, and a robust system of support both during and after the referral process.



Recommendation: Embed child-friendly language across safeguarding and justice responses, ensuring professionals use accessible terms and engage with children in ways that build trust and uphold children's rights.

Q6b. Do you think there are any indicators missing from the Modern Slavery Statutory Guidance that would help individuals or organisations to identify who may be a victim of modern slavery?

Yes

Q6c. Which indicators do you think are missing?

The current statutory indicators do not fully reflect how children are exploited in the UK. They overlook offences that are highly organised or sophisticated and therefore unlikely to be developmentally appropriate, such as high-end car thefts, burglaries, large-quantity drug supply, or targeted thefts of items like scooters or bikes. These patterns should signal orchestration by adults rather than independent offending.

There are parallels with domestic abuse, where grooming, coercive control, and fluctuating fear and loyalty are recognised. The same dynamics operate in criminal exploitation, yet indicators fail to reflect them. Key “push and pull” factors are missing, including poverty, care experience, disability, peer pressure, low self-esteem, or a need for belonging. Family-level indicators are also overlooked, specifically in cases of debt bondage/transference, where exploiters target siblings, intimidate parents/carers, and create fear in the home.

From Black Box's casework, additional gaps include the manipulation of social media imagery. Children are coerced to pose with cash, drugs, or weapons so that, if arrested, these images appear to show agency or lifestyle choices rather than evidence of exploitation. Similarly, drug use may be a coping mechanism for trauma, not a sign of consent. Indicators should also account for unusual or advanced knowledge of criminal activity, geography, or drug culture inconsistent with a child's age or background.

Children's apparent “choice” or compliance must never negate victim status. Compliance is often the result of grooming, coercion, and fear. Indicators should reflect the dual role of children who, while harmed through exploitation, may also cause harm to others. This does not reduce their entitlement to protection.

Recommendation: Expand statutory indicators to explicitly reflect criminal exploitation. This should include coercive control, push-pull factors, family-level impacts, manipulated social media imagery, unusual knowledge or behaviour inconsistent with age, and the dual status of children who may cause harm while being exploited.



Q7c. What would help practitioners understand when criminal exploitation is a form of modern slavery?

Frontline practitioners such as police, lawyers and court officials often struggle to see children as exploited when they commit serious offences, cause harm to others or present as though they are making choices. Too often exploitation is not recognised when there is a clear pattern of offending, so behaviour is interpreted as criminality rather than an indicator of harm. Practitioners need support to see offending behaviour as an indicator of need, shifting the lens from blame to child protection. Serious harm caused by a child should be recognised primarily as a child protection issue. Compliance must be understood as a product of coercion, not agency, in the same way responses to domestic abuse have shifted. Real-world scenarios and case studies help practitioners learn to interpret behaviour differently. Importantly, what a child says or how they present may be misleading: fear of reprisals, bravado, or lack of awareness can mask the seriousness of their situation and the extent of control.

Trauma-responsive approaches are vital to building trust and reducing harm. Models such as Barnahus² and the Scottish Child Interview³ show how safe environments can reduce the repeated and inappropriate questioning of victims and minimise (re)traumatisation. Lessons can also be drawn from responses to indoctrination and radicalisation, recognising criminal exploitation as a comparable form of such abuse.

In Scotland, CYCJ and Action for Children have developed a “CEC (Criminal Exploitation of Children) Framework”⁴ and toolkit, launched nationally in 2025 with associated training and an e-module for self-directed learning. It is applicable to all professionals encountering criminally exploited children and has received positive evaluations across six pilot areas. The screening tool has been particularly effective in improving recognition and multi-agency collaboration. Training has been delivered in multi-agency settings, providing space for reflection, challenge, and movement away from victim-blaming language such as that which may be associated with “child criminal exploitation”. It has also reinforced that responses must sit within child protection and link to contextual safeguarding.

Training for practitioners should strengthen confidence in recognising exploitation as abuse, while equipping them to respond to the nuances of criminal exploitation. Professionals therefore need a mix of training methods: scenario-based examples, understanding of coercive control, development of trauma-responsive pathways, reflective practice, and transitional safeguarding. This will maximise recognition, improve responses, and reduce gaps that currently leave children criminalised rather than protected.

Recommendation: National roll-out of multi-agency training on criminal exploitation, building on the Scottish CEC Framework and toolkit. Training must include scenario-based practice, trauma-responsive approaches, reflective

² Barnahus Network (no date) *Barnahus Network: About us*. Available at: <https://barnahus.eu/> (Accessed: 6 October 2025)

³ Holland, L., Adelaine, A. and Hastings, E. (2025) *The Scottish Child Interview Model: An Evaluation*. Glasgow: Children and Young People's Centre for Justice (CYCJ). Available at: <https://www.cycj.org.uk/wp-content/uploads/2025/06/SCIM-Evaluation.pdf> (Accessed: 6 October 2025)

⁴ Children and Young People's Centre for Justice (CYCJ) (2025) *Criminal Exploitation of Children (CEC) Framework for Practice*, 11 August. Available at: <https://www.cycj.org.uk/resource/criminal-exploitation-of-children-cec-framework-for-practice/> (Accessed: 6 October 2025)



learning, and an understanding of coercive control. Guidance should emphasise exploitation as child abuse, ensuring practitioners respond consistently to all forms of modern slavery.

Q8a. Based on the UK's international obligations, do you think there are any forms of adult exploitation and/or child exploitation which are not captured by the Slavery and Human Trafficking (Definition of Victim) Regulations 2022?

The current Regulations fail to capture several forms of exploitation, most notably child criminal exploitation (CCE).

Q8b. Please provide examples of this and explain why.

The Regulations are too narrow, with an overemphasis on trafficking. This framing excludes many cases where children are exploited entirely within their own communities. Although the Modern Slavery Statutory Guidance (MS Guidance) notes that some people may be victims of modern slavery without being trafficked, the Regulations make no such assertion. Human trafficking is not a prerequisite for exploitation. NPCC analysis has shown that county lines networks have become more localised⁵, often without any element of transport. By continuing to conflate exploitation with movement, the current definitions risk excluding children exploited in their own communities. In Black Box's casework, we frequently see British children forced to supply drugs or involved in organised crime without ever being transported. These children fall outside the current regulatory framing, despite clear indicators of coercion and abuse.

The Scottish legislation provides a stronger example, recognising exploitation as recruiting, harbouring, or controlling a person without any requirement for movement. A similar approach across the UK would ensure consistency and prevent children from being excluded from protection simply because their exploitation occurs close to home.

Criminal exploitation should also be recognised as its own category of modern slavery, rather than being subsumed under forced labour. The Regulations currently define slavery in terms of "slavery, servitude or forced or compulsory labour" and human trafficking as "travel arranged or facilitated by another person." Similarly, the MS Guidance defines modern slavery as "human trafficking, slavery, servitude and forced or compulsory labour." Neither offers an explicit reference to criminal exploitation. While the umbrella use of "modern slavery" was intended to broaden professional understanding, in practice it has hindered identification. Practitioners focus on more visible forms, such as sexual exploitation or forced labour, while overlooking indicators of criminal exploitation. The absence of a statutory definition of CCE exacerbates this problem, leading to inconsistent identification, the criminalisation of children and missed safeguarding opportunities. Clear recognition of CCE as

⁵ National Police Chief's Council (NPCC) County Lines and Gangs & National County Lines Coordination Centre (NCLCC) (2024) County Lines becoming more localised. Available at: <https://news.npcc.police.uk/releases/county-lines-are-changing-to-become-more-localised-reveals-new-county-lines-strategic-threat-risk-assessment> (Accessed 8 September 2025).



a distinct form of modern slavery would create consistency across agencies, strengthen safeguarding responses and reduce misidentification.

Finally, the Regulations are not future-proofed. Emerging forms of exploitation such as scam call centres, digital coercion, and the recruitment of children by peers who were themselves exploited are not adequately captured. Without explicit recognition, these patterns risk being overlooked until they are widespread.

A clearer and more consistent articulation of criminal exploitation within both the Regulations and the MS Guidance is essential to ensure victims are recognised, safeguarded, and not left invisible to protection systems.

Recommendation: Introduce a statutory definition and standalone category of child criminal exploitation within the modern slavery framework. This definition must acknowledge emerging forms of exploitation and make it explicitly clear that exploitation does not require movement and that children cannot consent to their own abuse and exploitation.

Q11A. Do you have evidence or examples of training models or materials about how to identify victims of modern slavery that you have found to be effective?

Yes

Q11b. Please describe why you think these training models or materials are effective

The training developed by CYCJ and Action for Children has been delivered online and in person. The online course enables facilitation of multi-agency partners to participate by reducing time out of their workload to attend. This training is offered as a general awareness raising session and contains information on:

- The policy and legislative landscape (children focused), highlighting existing guidance and direction as to how these can be used more effectively to respond and protect children;
- CCE as a child protection issue;
- Introduction of the “CEC” Screening tool;
- Indicators and push & pull factors of CCE;
- Child-first language;
- The Multi-Agency Self-Evaluation tool.

Follow-up sessions are in-person and use case studies to apply the screening tool, give professionals practical experience and facilitate discussion, questions, and opportunity for reflection. Strategic support is offered to embed the framework into local child protection practice, ensuring consistency and integration without duplicating existing systems.



In Scotland, we are aware of developments at local level in schools and with parents that are trying to be proactive and preventive, using materials that have been developed and trialled in local communities. There is a need for national consistency in delivering training with locally developed interventions and materials being promoted and shared nationally.

Black Box's training work with social workers, education and NGOs highlights the need for cultural sensitivity and competency-based training - ensuring professionals can demonstrate practical skills such as completing National Referral Mechanism (NRM) referrals, identifying coercive control, and applying trauma-informed practice, as well as recognising cultural-specific push-pull factors in cases of exploitation.

Training should also include case studies and anonymised accounts from practice. This allows professionals to understand how decisions about identification affect real lives. Lived experience voices, such as those delivered by Adam Elliott, are particularly valuable for challenging assumptions and building empathy, helping practitioners to avoid adultification and prioritise trust-building.

Adam's training programme, *The Long Game*⁶, offers an authentic, survivor-led perspective that bridges professional learning with lived experience. Delivered to safeguarding professionals across education, social care and policing, it equips practitioners to recognise grooming and exploitation dynamics, challenge victim-blaming attitudes, and build more trusting relationships with young people. His sessions complement professional frameworks by humanising the issue and reinforcing why survivor voices, empathy, consistency, and curiosity are critical to effective safeguarding.

Recommendation: Establish a national, consistent training framework on criminal exploitation that combines general awareness with competency-based practice. Training should include policy and legislative context, and clear identifiers, alongside practical skills such as making NRM referrals, recognising coercive control, and applying trauma-informed approaches. Delivery should be multi-agency, with both online and in-person components, and embed case studies and lived experience voices to build empathy, challenge assumptions, and reduce adultification.

Q12. What do you think can help victims and survivors of modern slavery feel safe and supported during the first interaction with professionals or services who may recognise indicators of exploitation?

For many children, their first point of contact with services is when they are arrested or stopped by police, often in the context of potential offending behaviour. Victims of exploitation who have offended because of their abuse

⁶ Leaders Unlocked (no date) *The Long Game*. Available at: <https://leaders-unlocked.org/projects/the-long-game/> (Accessed: 6 October 2025)



are treated as offenders first and there is widespread disbelief of their experiences, particularly when nearing their eighteenth birthday.

Case Study: The Consequences of Not Being Believed at First Contact

This young person described how, after being shot in the eye and left permanently blind on one side, he provided police with names and details of those exploiting him. Despite this, his account was dismissed and he was prosecuted. After a lengthy wait, he eventually received a positive Conclusive Grounds decision and the case was discontinued, but no support was provided in the meantime. During this period he was tracked down by the same exploiters, labelled a “snitch,” and re-exploited. He was told his options were to comply - risking imprisonment - or be left completely blind. Police continued to disbelieve him, pursuing prosecution a second time. Earlier recognition of his exploitation and safeguarding intervention could have prevented this re-trafficking and the extreme harm he suffered.

Police stations and social work offices rarely have trauma informed processes in place nor are there trauma responsive designed spaces. The environment, demeanour of professionals and impact of processes shape how children and young people experience these first interactions, often creating barriers and a reluctance to engage in future. Children feel safest when they are met in child friendly spaces, with appropriate language and communication styles that facilitate their understanding and participation. These spaces must take into account the impact of trauma on cognitive development, as well as neurodivergent presentations and how children can be adept at masking these. Pacing of questions is critically important and recognising that inconsistent accounts of exploitation can be indicative of trauma. The provision of a safe adult (i.e. an advocate or trusted person) along with a solicitor are examples of good practice. The aforementioned Barnahus approach and Scottish Child Investigative Interviewing Model are examples of how trauma responsive spaces can be developed and implemented.

In response to this question, Adam shared the following perspective: victims and survivors of modern slavery need their first interaction with professionals to feel safe, non-judgemental, and built on trust. Too often, young people are treated as offenders rather than victims. What helps is a collaborative approach that avoids adultification, shows genuine care, and offers hope. From my experience, the qualities that matter most are: Care, Opportunities, Relatable support, Respect, Engage, and Trust (C.O.R.R.E.C.T.). These principles ensure that young people feel valued, understood, and motivated to accept support.

Recommendation: First contact with victims of criminal exploitation must be trauma-responsive, child-centred, and delivered in environments that feel safe and non-judgemental. Police stations and social work offices should adopt child-friendly processes, with accessible language, recognition of neurodiversity and developmental trauma, and the provision of a safe adult or advocate alongside legal support.



Q13a. What do you see as the benefits and drawbacks of the current centralised model, where modern slavery victim status decisions for both adults and children are made by national Competent Authorities (e.g. SCA/IECA)?

There are advantages to a centralised model with the most obvious being the consistent application of decision-making frameworks - the same thresholds and interpretation of exploitation - however this will also be open to local interpretation and does not remove bias. This approach removes the potential for a postcode lottery and provides a degree of protection, where some areas may be less attuned to child criminal exploitation or more inclined to frame children's behaviour as offending behaviour. Additionally, national decision-makers hold specialist expertise in cross-border cases, immigration issues and trafficking networks, which can be particularly relevant for non-UK nationals.

The focus of the centralised model prioritises immigration control and cross-border trafficking (UK borders). This is indicative of the origins of the NRM as a response to individuals/groups trafficked into the UK rather than as a child protection response. The rise of county lines exploitation began to place emphasis on UK-based trafficking and slavery, though many issues still remain. The lack of local knowledge regarding peer networks, coercive dynamics, the characteristics of criminal exploitation in that specific area, or contextual safeguarding, means decisions are frequently detached from the real experiences of children's lives, as these issues cannot be understood from referral forms alone. The absence of this local context results in decisions that may misinterpret behaviours as choices rather than indicators of coercion, or a child protection concern.

Another concern relates to the NRM response rate, with delays in decisions significantly impacting the safety and rehabilitation of children and young people. This uncertainty undermines trust, prolongs risk of re-exploitation, and leaves children and young people often labelled as an "offender", with the belief over whether they are a recognised victim left hanging. This is retraumatising and contradicts child protection principles where the focus should be on immediate safety rather than blaming and punishing them for their own exploitation, in contravention of the United Nations Convention on the Rights of the Child (UNCRC).

The centralised process is also unclear with children, families, and even practitioners failing to understand how decisions are made, creating mistrust. For children conditioned into mistrusting professionals and services, it reinforces the idea that adults and agencies cannot protect them.

Critically, the centralised model is disconnected from child protection processes. NRM decisions are made in parallel rather than embedded within statutory child protection structures, for example Interagency Referral Discussions (IRDs) or Child Protection Case Conferences. This duplication means children must repeatedly re-tell their stories, increasing retraumatisation and leading to contradictions where one system recognises harm while another delays or denies victim status.

Recommendation: Reform the NRM for children so that it is embedded within statutory child protection processes, guided by both central consistency and local safeguarding knowledge. Decision-making must be timely and transparent, with clear communication to children, families, and practitioners, and framed as a child protection response rather than an immigration control mechanism, in line with the UK's UNCRC obligations.



Q13b. What do you see as the benefits and drawbacks of devolving modern slavery victim status decision-making for both adults and children to regional or local agencies?

Devolving victim status decision-making to local or regional agencies carries both opportunities and areas that need careful development. For children, a localised approach has clear advantages when supported by national oversight. Local agencies are closest to the child and can understand exploitation in its full context. Teachers may notice sudden changes in attendance or behaviour. Housing officers may observe exploiters near placements. Police may recognise patterns of control around addresses. This contextual knowledge is critical to recognising exploitation.

Local decision-making also allows for quicker decisions. These are important as they influence whether a child is criminalised and prosecuted or supported and protected. Embedding NRM decisions into existing child protection structures such as IRDs, Multi-Agency Concern Hubs, and Child Protection Case Conferences integrates exploitation recognition into the very systems already tasked with child protection. This reduces duplication, builds confidence across agencies, and creates shared understanding, positioning all forms of exploitation as a child protection concern.

Devolution may also strengthen engagement as children are more likely to trust professionals that understand their local context, have an existing relationship with them, and who they can relate to. Exploiters thrive on creating and increasing mistrust of the system and the services within it. Having decisions made by known professionals in familiar child protection forums increases the chances that children, young people, and their parents will feel listened to and protected.

There are, however, limitations of localised models. These could include inconsistency, bias and capacity gaps. Without national standards, children may be treated differently depending on geography, lack of specialist training, stretched child protection responses and turn-over of staff where knowledge of exploitation is lost. Some areas may lack specialist knowledge of coercive control, grooming and criminal networks where they either have limited incidences of exploitation, or it is more hidden. This creates vulnerability to misinterpretation and the responsabilisation of children. There is also a danger of conflict of interest when local agencies, particularly law enforcement, prioritise prosecution over protection. Without safeguards, the same agency could be simultaneously investigating a child for offences and determining their victim status.

Recommendation: Devolve NRM decision-making for children to local safeguarding structures, supported by strong national standards and oversight. Safeguards must ensure consistency across the UK, specialist training on coercive control and grooming, and protection against bias or conflicts of interest where agencies may also be involved in prosecution.



Q13c. What do you see as the benefits and drawbacks of multi-agency involvement in modern slavery victim status decision-making for both adults and children?

Multi-agency decision-making reflects the reality that no single agency can recognise and respond to exploitation in isolation. Children live across various environments and spaces, and different services will have their own knowledge about these contexts. For example, social workers may understand the family stressors, police may have intelligence about peers and adults that the child is associating with, schools may observe peer influence and changes in peer groups, health professionals may have information on violence-related injuries, and NGOs are often positioned to be able to build relationships that children, young people and families feel safe to engage with. It is the collaborative working between all of these organisations that allows for a more holistic understanding of the child's experiences.

Multi-agency approaches are already at the heart of child centred practice in Scotland, ensuring shared accountability. The strength of multi-agency decision making is in the opportunity for different perspectives and expertise to be brought together, which is critically interrogated to inform balanced decisions. This prevents biased thinking through professional challenge whilst holding the best interests of the child as paramount and ensuring that a welfare lens remains central.

It must be acknowledged that multi-agency panels are resource-intensive and can be slower. If poorly structured, they risk delay or being dominated by the loudest professional voice, which may re-centre criminal justice rather than child protection or vice versa. Whilst the child's needs are central, it is important to consider that there may be wider public protection concerns. Whilst the focus remains on the child and their welfare, this must be balanced with the protection of others. This is not an either or but a combination of both.

Recommendation: Integrate victim identification into existing child protection processes to avoid unnecessary duplication promoting consistency through use of existing scrutiny and oversight frameworks.

Q13d. In a multi-agency decision-making model, which organisations or professionals do you think should be involved in the decision-making process for adult and child cases? Please rank the top five in order of importance (1 = most important)].

Organisation	Children/Young People	Adult
1.	LAs/Health & Social Care	LAs/Health & Social Care
2.	Education	Law Enforcement
3.	Law Enforcement	Mental Health Services
4.	NGOs	NGOs
5.	Survivor Lived Experience	Survivor Lived Experience



Q13e. Do you think certain types of NRM referrals (e.g. for those exploited overseas only, those exploited in the UK only, different exploitation types) are better suited to any of the specific decision-making models?

Flexibility is needed as no single model fits all types of exploitation, but child protection must be the core purpose. For children exploited within the UK, particularly through criminal exploitation, local multi-agency decision-making is most appropriate. These cases depend heavily on contextual knowledge: peer groups, family vulnerabilities, and local community dynamics. Embedding decisions within IRDs or Child Protection Case Conferences ensures recognition is immediate and integrated with protection planning.

However, where exploitation involves movement across borders, centralised oversight is essential. National competent authorities hold the specialist immigration and international law expertise required. Local agencies must still provide contextual information, therefore a hybrid model that consists of local information gathering and national validation supports compliance with international obligations while grounding decisions in the child's lived context.

Children rarely experience a single form of exploitation in isolation. A child or young person exploited through county lines may also be sexually exploited, groomed online and/or face financial exploitation. Thus, professionals must understand how different types of abuses can coexist. Separating these abuses into silos creates barriers, duplication and complex systems that are not just onerous but fail to acknowledge the full picture of harm. National expertise is needed to aid tracking of emerging patterns and organised networks. However emerging trends often start locally whether this is in peer groups, online spaces or community dynamics before evolving into national or international patterns. Conversely, global exploitation tactics are quickly adapted and can be applied in local contexts. Without strong national-local connections and collaboration, systems will fail to identify these shifts early and adapt responses quickly, failing to protect children in real time.

Recommendation: Adopt a hybrid model of decision-making which makes child protection the core purpose across all exploitation types. Local multi-agency panels should lead on cases of domestic criminal exploitation where contextual knowledge is critical. Where exploitation involves cross-border movement, centralised oversight is essential to provide immigration and international law expertise, but must be informed by local safeguarding information.

Q14a. What changes could help improve the process of gathering and sharing information with the Competent Authorities to inform victim status decisions after an initial referral has been made (i.e. Reasonable Grounds and Conclusive Grounds decisions, and any reconsiderations of these decisions), while enabling these decisions to be made in a timely and efficient way?



The current system for gathering and sharing information with competent authorities appears fragmented, slow and overly dependent on disclosure. Several reforms are needed to make decisions timely, accurate and child centred.

Integrating NRM referrals into child protection processes (IRDs in Scotland, MASH in England and Wales) would ensure information is available across multi-agencies, consistent with child protection assessments and avoids duplication.

Referral forms should require practitioners to document indicators of coercion, grooming and contextual factors, this would support shifts in language and avoid behaviour being framed as a child making choices or offending behaviour. Templates must explicitly capture push-pull factors, family stressors, coercive control and grooming dynamics. Drawing on domestic abuse frameworks where coercive control is now central would strengthen this. This would also reduce the drive for disclosure to prove exploitation and contribute to a growing database for evidence-based practice. Behavioural changes, inconsistencies and bravado are all trauma indicators and should be treated as such. Family impacts should be captured as exploiters frequently leverage siblings, intimidate parents and create fear in the home. Recognising these signs would help identify exploitation earlier.

Secure digital platforms should allow real-time sharing across agencies. Dedicated local NRM liaison officers could collate, quality-assure and escalate evidence to competent authorities. Statutory deadlines must be introduced as lengthy delays retraumatise children and leave them unprotected.

From our engagement with practitioners, systems and research, we have heard clear concerns consistently raised in practice. A recurring theme is the failure to share information about children as child protection concerns, particularly where police investigations involve organised networks or serious organised crime. Practitioners describe situations where investigations are prioritised over child protection, leaving children at risk and their exploitation unaddressed.

We hear repeated frustration from professionals who note that children are known to be in contact with organised crime groups, yet this is not consistently treated as a child protection issue. Information about who is exploiting children is often withheld because police do not share this intelligence with child protection partners. While we recognise the sensitivity and implications of this information, it results in children remaining invisible within child protection processes and increases the likelihood of criminalised. When protection is secondary to investigation, children are positioned as disposable both by exploiters who use them as commodities and by services that fail to see and respond to them primarily as victims of abuse.

Recommendation: Embed NRM referrals into child protection processes, using standardised templates that capture coercion and family impacts. Introduce statutory deadlines and secure information-sharing platforms to prevent delays. Require police to share exploitation intelligence with safeguarding partners so children are protected, not criminalised.



Q15. Do you think that having two decisions in the NRM (Reasonable Grounds followed by Conclusive Grounds) supports effective identification of victims of modern slavery?

The current two-stage model creates delay, confusion and re-traumatisation for children. While it was designed to provide immediate protection followed by a more detailed investigation, in practice it too often results in children being left in limbo for months or years, caught between being treated as offenders and potential victims.

For children, the exploitation itself should be treated as child abuse. Child protection principles establish that children cannot consent to exploitation and should be protected as soon as credible indicators of harm are present. In most child cases, the “Reasonable Grounds” threshold is already enough to warrant full recognition. Requiring a second “Conclusive Grounds” decision imposes an unnecessary evidential burden that delays support and risks children being criminalised while their case is “proven.” This contradicts the core principle of child protection, which is to intervene early and decisively in the face of credible risk. It also creates confusion across professionals and children as to the differences in evidential thresholds.

There may be cases where a two-stage process could be helpful such as where the centralised expertise of competent authorities is needed to address cross-border or complex exploitation. For example:

- Cases involving non-UK nationals where immigration status and international law obligations must be carefully assessed;
- Situations where organised networks span multiple jurisdictions and require intelligence collation at national level;
- Cases where the exploitation does not neatly fit existing categories (such as emerging digital exploitation) and national-level pattern recognition is needed.

In such circumstances, a hybrid approach could work with local child protection systems making the initial recognition decision, ensuring children are protected immediately, while the centralised authority provides the second-stage validation where cross-border, immigration, or complex organised crime elements are present. This preserves consistency for international obligations without subjecting every child to a slow, two-tier process. This may also aid in collation of more concrete evidence for prosecutions of exploiters and access to protection for victims where significant harm is a real and actionable threat.

Recommendation: Replace the two-stage NRM model with a single recognition decision embedded in child protection processes for UK children, ensuring immediate safeguarding without delay. Reserve a two-stage approach only for complex cross-border or immigration cases, with statutory deadlines and trauma-informed practice applied. This hybrid model would align with child protection principles, prevent children being left in limbo, and maintain national consistency where specialist expertise is required.



Formal Identification of Victims of Modern Slavery

In many historical cases of modern slavery, victims have been coerced into criminal activity over a number of years, often accumulating multiple arrests or convictions for serious offences directly linked to their exploitation. Increasingly, at Black Box we encounter young people who are disqualified from entry into the NRM, and therefore denied vital support, because of the Public Order Disqualification (POD). Under Section 63 of the Nationality and Borders Act 2022, this includes convictions for offences listed in Schedule 4⁷ of the Modern Slavery Act 2015, such as threats to kill, grievous bodily harm, malicious wounding, possession of firearms, robbery, burglary and violent disorder. We recognise the seriousness of these offences, but emphasise that they are also common acts which victims of criminal exploitation are forced to commit under coercion and control. Disqualifying survivors on this basis undermines the principle of non-punishment, as set out in Article 26 of the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT), by penalising victims for crimes that are a direct consequence of their exploitation.

The higher NRM evidential threshold has led to a significant increase in negative Reasonable Grounds (RG) decisions. Research from After Exploitation⁸ shows that in 2023-24 more than half of RG rejections were made on the grounds of “insufficient proof,” compared to just 3% in 2022. Alarming, when reviewed a second time, around 70% of cases went on to receive a positive decision. This demonstrates that the evidential bar is being set far too high at the initial stage, leaving many victims without protection or support. The short timeframe of 30 days for reconsideration requests compounds the problem. It is unrealistic to expect victims to obtain additional evidence within this period, particularly when many are only beginning to come to terms with the fact that they have been exploited. In our casework, it often takes between two and seven years for victims to feel ready to disclose the details of their exploitation. Grooming, coercive control, fear of criminalisation and violent reprisals all contribute to delayed disclosure. Another barrier is the lack of transparency in the referral process. Victims are not provided with copies of their referrals or told who their First Responder was, making it almost impossible to challenge or clarify what information was initially submitted.

While the Call for Evidence guidance states that “effective identification of victims of modern slavery in the UK is critical for ensuring that victims can be protected and provided with appropriate assistance and support towards their recovery from exploitation,” our casework demonstrates that this principle is not being met. For British children subjected to criminal exploitation, a positive Conclusive Grounds (CG) decision rarely provides any tangible support. Although Independent Child Trafficking Guardians (ICTGs) are meant to be available, many of the children we work with receive no additional help, particularly where they are already subject to statutory intervention. In practice, positive NRM decisions often make little difference to their day-to-day safeguarding. Moreover, children are rarely informed about what a positive decision means in terms of rights or entitlements, leaving them unaware of what support should be available. Training for First Responders should include clear

⁷ Modern Slavery Act 2015, schedule 4. Available at: <https://www.legislation.gov.uk/ukpga/2015/30/schedule/4> (Accessed: 2 October 2025).

⁸ Vaughn, E. and Esslemont, M. (2025) ‘Modern Slavery Reconsiderations: After Exploitation + Anti-Trafficking Monitoring Group (ATMG) Briefing’, March. Available at: <https://www.antislavery.org/wp-content/uploads/2025/03/Briefing-Modern-Slavery-Reconsiderations-After-Exploitation-ATMG.pdf> (Accessed 8 September 2025).



guidance on support pathways, so that victims are given accurate information about the help they can expect to receive.

Case Study: Positive Identification without Protection

As a child, the victim's family incurred a large debt from a loan shark to seek medical treatment in Turkey for a sibling. From about age 9-11, he was encouraged by his family to "work off" the debt for the creditors. He was coerced into couriering bags for adults, subjected to violent assaults when items were lost (including a broken arm and later a stabbing), and threatened with harm to his family. He was then deceived with a promise of legitimate work abroad, transported through multiple countries, briefly forced to tend cannabis plants and ultimately smuggled to the UK by lorry under duress.

On arrival he disclosed to authorities and entered foster care. Despite that, after a period of relative stability he was located by the same exploiters in the UK, abducted and coerced into county lines drug supply, working long hours under continuous threats. He was later arrested. Throughout, threats of violence were routine and explicitly targeted at him and his family.

Although his circumstances were recognised within the modern slavery framework, he received no consistent safeguarding or sustained support linked to that identification. There was no safe, longer-term protection plan (e.g., safe relocation, specialist advocacy, trauma therapy), leaving him vulnerable to re-exploitation and ongoing intimidation. He reported persistent hyper-vigilance, social isolation and hopelessness.

Identification alone is insufficient. A positive decision must automatically trigger practical protection (safe placement, specialist advocacy, trauma-informed therapy, disruption of perpetrators) to prevent re-exploitation and to support recovery.

Recommendation: Reform the NRM to uphold the principle of non-punishment and ensure no victim is excluded from protection due to offences committed under coercion or control. The Public Order Disqualification should be applied in line with Article 26 of ECAT, with safeguards preventing victims from being penalised for crimes linked to their exploitation. The evidential threshold at the Reasonable Grounds stage should be lowered, the reconsideration window extended beyond 30 days and victims provided with copies of their referrals and the identity of their First Responder. A positive Conclusive Grounds decision must automatically trigger access to meaningful safeguarding and specialist support, including Independent Child Trafficking Guardians and clear information on entitlements, so that all victims - particularly British children - can understand and exercise their rights.



Failures in First Responder Identification and Referral

Despite police being designated First Responders, in Black Box's casework we have repeatedly seen failures to identify children as victims of criminal exploitation at the point of arrest or interview. Common indicators are routinely overlooked, such as a child being found out of area, located in a drug user's property, or carrying multiple mobile phones. These are well-recognised signs of criminal exploitation, yet they are often treated as evidence of criminality rather than exploitation. The result is that children are criminalised instead of safeguarded.

We have also seen cases where police outright refuse to make NRM referrals, even when indicators are present and despite requests from solicitors. In some cases, children gave "no comment" interviews due to fear of reprisals from exploiters or lack of trust in police, yet later disclosed exploitation to their solicitors. Even when solicitors asked the police to make a referral, this was refused. In such situations, children are left disadvantaged: they are dependent on solicitors who know the NRM system or reliant on other First Responders such as the Salvation Army. This process often requires victims to sit in an office with their solicitor, phone the Salvation Army and make disclosures they are reluctant or unable to articulate. Such barriers exclude many victims from protection.

Age is a further factor in inconsistent identification. Younger children (aged 14-15) are more likely to be recognised as victims, whereas older children (16-17) are often treated as offenders. Where NRM referrals are not made at the first opportunity, long delays in the criminal justice process can have devastating consequences. We have worked on cases where a 16 or 17-year-old arrested for drug offences was referred into the NRM late into their court case, or not at all. By the time the case reached trial, they had turned 18. Without an NRM decision evidencing their exploitation, their case was transferred to the Crown Court and they were tried as an adult. An early NRM referral could have helped ensure that the case remained in the youth court and safeguarded the young person more effectively.

Finally, there is a fundamental conflict in expecting victims to disclose exploitation to the same police officers who have just questioned them as offenders. This dynamic makes it unrealistic to rely solely on police for victim identification and referral, highlighting the need for a wider pool of First Responders and independent pathways for disclosure. As Adam Elliott notes, where police (and social workers) are involved in taking statements, their approach must be meaningfully trauma-responsive rather than system-led. This includes wearing plain clothes, avoiding marked police cars and considering any past positive or negative relationships with the child. Children should have choice in who they provide their account to. Just as sexual exploitation victims are offered choice in who responds to them, the same principle should be extended to victims of criminal exploitation.

Recommendation: Expand and diversify the pool of First Responders beyond police to ensure children can disclose exploitation safely and without fear. All professionals involved in identification and referral must be trained in trauma-responsive practice, with police and social workers adopting non-triggering approaches - such as plain clothes, unmarked vehicles, and offering children choice over who they speak to - mirroring protections already afforded to victims of sexual exploitation.



Black Box
Research & Consultancy



This submission reflects our shared commitment to ensuring that all victims of exploitation - particularly children - are recognised, protected and supported through evidence-based, trauma-informed and rights-focused practice.

We would welcome the opportunity to discuss this submission further and contribute to future policy development, roundtables or working groups focused on improving the identification and protection of victims of modern slavery.

For further information or to arrange a discussion, please contact:

Dr Grace Robinson

Director, Black Box Research & Consultancy Ltd
grace@blackboxresearchandconsultancy.com

Donna McEwan

Practice Development Advisor, Children and Young People's Centre for Justice (CYCJ)
donna.mcewan@strath.ac.uk

Adam Elliott

Workshop Facilitator, Leaders Unlocked
adam@leaders-unlocked.org