

Wednesday 8 October 2025

ADCS response to the Home Office consultation on modern slavery

1. Introduction

The Association of Directors of Children's Services Ltd. (ADCS) is the national leadership organisation in England for directors of children's services (DCSs). Under the provisions of the *Children Act (2004)*, the DCS acts as a single point of leadership and accountability for services for children and young people in a local area, including children's social care and education.

ADCS is committed to the principles of equity, diversity, and inclusion which are fundamental to all areas of our work. We are committed to highlighting issues of disproportionality, discrimination and systemic barriers that limit opportunity where they exist, recognising that not all children, young people and families are impacted equally. ADCS welcomes the opportunity to respond to the Home Office's wide-ranging consultation on modern slavery.

This response draws on the views of ADCS members shared via email as the timing of the consultation did not allow for a discussion at a meeting of the relevant national policy network(s).

2. Definition of modern slavery

ADCS members noted the current definition of modern slavery is simultaneously broad and multifaceted, yet it doesn't adequately cover all of the risks and harms children and young people experience e.g. rape. It is also unlikely victims and survivors would use such a term to describe themselves, or their experiences.

The term modern slavery is open to interpretation and different, and at times duplicative pathways exist for trafficking, and exploitation, which can be confusing for frontline staff. This suggests a need to revisit definitions and/or find a more inclusive term, one that is more sensitive and empowering. A visual tool that illustrates various and related pathways to help improve both understanding, and responses, was also suggested by some ADCS members.

3. Guidance

Statutory guidance on modern slavery, and the indicators within it, are outdated and overly focused on adults and on victims from overseas. There needs to be better recognition of children, including white British children, as victims of modern slavery, particularly in cases of criminal and financial exploitation.

Multiple ADCS members felt financial exploitation for under-18s should be referenced alongside online exploitation, as these are growing issues being seen in children's social care. It was also noted that debt bondage as well as forced marriage are excluded, while emerging methods of supply, such as drop shipping and online delivery of drugs, are increasingly being observed over and above the "county lines" model of exploitation, which implies a more geographically localised model of exploitation.

Current guidance uses outdated language in relation to indicators of sexual exploitation e.g. “work in brothels” or “prostitution”, again focusing heavily on victims being adults from overseas rather than UK citizens and children. Recent Home Office data show that almost a quarter of the 5125 NRM referrals received between January and March 2025 were for UK citizens (23%), 76% of whom were children. It is likely British victims, particularly children, are underrepresented in the NRM process.

4. National referral mechanism (NRM)

ADCS respondents noted that the central NRM process is not timely or transparent, and a formal and consistent feedback loop is needed to support learning and improved referrals in the future.

LAs piloting devolved NRM decision-making report benefits in terms of the improved timeliness of decision making for children, and the related impact on Section 45 Statutory Defence. However, a recent shift in the quality assurance (QA) process for devolved NRM decision making is being seen, with additional requests for supplementary information to further evidence threshold, especially for certain types of exploitation, which is impacting on timeliness.

Pilot sites report a training need for technical specialists regarding the sexual exploitation of children and young people (CSE), particularly in relation to their understanding of the ‘exchange’ element for a child; this does not have to be gifts or money and can be, for example, a sense of love or belonging. In addition, specialists need a greater understanding of the real barriers to disclosure a child may face. This is referenced in the referral guidance, but it appears less recognised in the decision making or QA processes.

Similarly, pilot LAs report the single competent authority (SCA) has a preference for NRM threshold being evidenced for each individual ‘incident’ e.g. each arrest or occurrence where a child has been exploited. And, in light of the recent audit on group-based CSE by Baroness Casey highlighting that agencies were missing CSE due to gatekeeping definitions, this must be a consideration here. These barriers can also cause the NRM process to seem removed from the lived experience of the very victims it seeks to identify.

Incident-led approaches also risk losing the nuance of a child’s lived experience, where grooming starts at an early age and they are exploited through different contexts for a number of years. In addition, it does not consider the broader vulnerabilities and intersectionality, especially for CSE, which is challenging to identify.

Pilot sites noted that funding for local decision making is insufficient and is not properly adjusted in relation to demand, with only minimal staffing costs covered. If identification improves and referrals increase, the panel model may not be sustainable.

5. Responding to modern slavery

Multi-agency decision-making and ownership is essential; children’s social care, youth justice services, health, education, police, legal advisors and voluntary sector partners should be equally working together.

The first responder role as currently imagined overlooks the vital role of schools and youth services for under 18s who are victims of modern slavery.

When considering the right help at the right time, it is important to understand if one agency, or a particular key worker, might make better progress in working with the child to feel safe and make a disclosure. This can be particularly important when considering gender, disability, or the ethnicity of both victims and perpetrators of abuses and exploitation. A female CSE victim may find it harder to disclose her experiences to a male police officer, for example.

Wider awareness of exploitation and modern slavery amongst partners, such as health services, is needed to speed up identification as well as the provision of help and support. Joint, multiagency training along the lines of the “achieving better evidence” (ABE) training social workers receive from the police was suggested by ADCS members.

Training is inconsistent and too often it lacks a child-centred and trauma informed lens – this should be updated to include all forms of exploitation, including financial, and specifically tailored for those working with children.

No single agency is likely to have all of the relevant information, and it can be complex to obtain. ADCS members suggested that streamlined, secure information-sharing protocols are needed to support this work, along with clear guidance for all agencies.

The issue of recording information was raised as an area for future development; as victims do not always see or understand they are being abused or exploited, believing they are in a consensual relationship, so victimless statements, which are used in domestic abuse cases, could be considered here, particularly for child victims.

ADCS members also raised the need for greater focus on, and investment in, support as well as better understanding the services affected children want to see. A clearer articulation of the support to be offered after a conclusive grounds NRM decision should/could the look like and the duty of all partners to assist was felt helpful for under 18s.

In responding to child victims, ADCS members felt there is a need for greater recognition of the role of trusted adults and for staff outside of the police to be ABE trained to support victims and listening to the voices of victims and survivors. Again, this is particularly important where female victims of sexual abuse and exploitation are questioned by male police officers, for example. Having specialist trained staff of each gender would be useful here.

Finally, there was a query raised by some ADCS members about whether the NRM process was needed at all for under 18s if children’s social care has assessed and identified abuses and exploitation as delays only add to the harm experienced.

To discuss any of the points raised in this consultation response in detail, please contact the relevant ADCS policy officer in the first instance via katy.block@adcs.org.uk.