



# Child Trafficking & Exploitation Multi-Agency Guidance

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# 1. Introduction

The purpose of this guidance is to present a strategic multi-agency framework to respond to the need to protect children and young people in Argyll & Bute who have been, or are at risk of being, trafficked.

## 1.1 Context

Child trafficking is a global business that targets and victimises the most vulnerable children for transportation, abuse and exploitation across the world. It is a largely hidden problem and is often described as a form of modern-day slavery. The children involved are in no way responsible for their predicament, having been coerced, bribed or forced into, and unable to escape from, the control of traffickers. The effect of trafficking on children is wide-reaching; many will experience significant harm as a result of their situation, and outcomes for them may be extremely poor as a result of lack of proper care or access to universal services such as health and education as traffickers seek to avoid contact with the authorities.

Therefore, those agencies involved in their protection will need to develop strategies to actively identify, protect, support and, where possible, investigate and prosecute those who exploit them.

## 1.2 The Guidance

This guidance has been developed to support front line practitioners and their managers who are working with children and young people who may be suffering significant harm or at risk of suffering harm through child trafficking and exploitation. It will enable identification and inform appropriate responses in relation to children and young people's support and protection needs.

This guidance should be read in conjunction with the Argyll & Bute Multi Agency Child Protection Procedures and [Inter-Agency Guidance For Child Trafficking - Child Trafficking Assessment National Referral Mechanism \(www.gov.scot\)](#)

While this guidance is in respect of trafficking and exploitation, Argyll & Bute has specific guidance relating to children at risk of sexual exploitation. Practitioners need to give consideration to all forms of exploitation when considering Trafficking.

## 1.3 Scope of Guidance

For the purposes of this guidance “**child**” means a person under the age of 18 years.<sup>1</sup>

This multi-agency guidance is for all staff working in children and adult services (including voluntary sector workers) working with young people under the age of 21 years.

This guidance also applies to children and young people 16 years and over who are not looked after and do not have the added safety net of a supervision order. These children and young people are equally vulnerable. This guidance supports and informs the assessment of need and risk where trafficking is suspected or known and complements the Young Person Support and Protection Procedures (YPSP).

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## 2. Child Trafficking

### 2.1 Defining Human Trafficking

Human trafficking is defined through the Human Trafficking and Exploitation (Scotland) Act 2015 which makes human trafficking a criminal offence.

Human trafficking is a process that is a combination of three basic components:

- Movement - (including within the UK – referred to as Internal trafficking) recruitment, transportation, transfer, harbouring or receipt of persons.
- Control - threat, use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or the giving of payments or benefits to a person in control of the victim
- Purpose – exploitation of a person, which includes prostitution and other sexual exploitation, forced labour, slavery or similar practices, and the removal of organs

### 2.2 Defining Child Trafficking

A child victim of human trafficking or exploitation is a victim of child abuse.

The Palermo Protocol establishes children as a special case and any child found to have been moved for exploitation is considered to be a victim of trafficking, whether or not they have been deceived, or agreed to move, because it is not considered possible for children to give informed consent.

The distinction between trafficking and smuggling is also considered an important one in determining if a child has been trafficked, as smuggling is taken to mean that arrangements are consensual and that a smuggler has been paid to help people to enter the country illegally, after which there is no longer a relationship and no exploitation. However, there are concerns that in respect of child and adult victims of trafficking, and at the front line of child care and protection work, the distinction between trafficking and smuggling is often blurred – research has highlighted that some children have been abused on their journeys to Scotland after paying smugglers to get them to the UK.

It is also crucial to recognise that trafficking and exploitation does not only affect children from other countries and there are cases of domestic trafficking and exploitation of children who have been born and brought up in Scotland. (Trafficking and Exploitation Strategy, 2017)

The Human Trafficking and Exploitation (Scotland) Act 2015 also makes slavery, servitude and forced or compulsory labour an offence. These are not further defined in legislation but are terms which are defined in international labour and human rights law.

It will often not be initially evident which, if any, of these situations are present and this will often not become apparent until further inquiries have been made. Therefore, it is important to be able to identify potential indicators of an exploitative situation (see Child Trafficking Matrix Appendix 2) and respond following these guidelines.

The Child Trafficking Matrix is not a validated assessment of actual, or risk of, trafficking. It is based on present best available information as to what factors in a child's circumstances may lead to the belief a child has been trafficked. It should not replace a comprehensive child protection or GIRFEC assessment.

As the two prerequisite factors for child trafficking are movement and exploitation this matrix has been adapted following Scottish research and colour coded to aid decision-making and to inform discussions. If exploitation (red E) and movement (green M) indicators are present a child trafficking

assessment (Appendix 1) should be undertaken and a referral to the National Referral Mechanism seriously considered.

The matrix is not an exhaustive list of factors and other concerns may be present. For UK national children especially movement may involve that between and within cities, between accommodation, places of abuse within a city and movement between different people. The indicators may apply to both UK nationals and/or migrant children and to both boys and girls and should be kept in mind when working with children when making an initial assessment. They are not questions to be directly asking children at the initial stage of enquiry. The indicators do not replace child protection investigations and the presence, or otherwise, of trafficking suspicions should not preclude the standard child protection procedures being implemented.

#### **Child Criminal Exploitation (County Lines)**

**The exploitation of young and vulnerable persons is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people in the rural marketplace (commonly referred to as cuckooing). (Police Scotland)**

### **2.3 Additional Powers under the Human Trafficking and Exploitation (Scotland) Act 2015**

The Human Trafficking and Exploitation (Scotland) Act 2015 contains preventative measures in the form of orders that can be applied to restrict the activities of those who have been suspected of or convicted of human trafficking.

#### **Trafficking and Exploitation Orders (TEPOs)**

TEPOs are available to the court for any accused convicted of a relevant offence.

#### **Trafficking and Exploitation Risk Orders (TEROs)**

Section 26 of the act introduces TEROs which can be applied for by the Chief Constable only and can be made by the Sheriff where

- a) There is risk the accused may commit a trafficking or exploitation offence
- b) Each prohibition or requirement in the order is necessary for the purpose of protecting persons generally from the physical or psychological harm which would be likely to occur if the offence was committed.

The sheriff can also make an Interim Risk Order whilst consideration is being given to the granting of a risk order.

### **2.4 Child Sexual Exploitation (CSE) and Trafficking**

Due to the often orchestrated nature of Child Sexual Exploitation (CSE), professionals need to be alert to the potential that victims of CSE may also be victims of trafficking.

Being recognised as a trafficked child may allow victims of CSE access to additional protections contained within the human trafficking legal framework. For instance, increased identification opportunities due to the fact that under trafficking legislation there does not have to be evidence that abuse took place, just the intent to exploit. Therefore children and young people are not required to make a disclosure of exploitation. Furthermore, the criminal sentences offences linked to human trafficking are higher. Linking an offence to human trafficking also allows the prevention measures set out at section 2.3 to be considered and applied for.

Due to the manner in which exploitation occurs, a continuum of exploitation often means that children and young people may be forced to commit crimes whilst under the control of others. The legal framework for human trafficking recognises this and where there is a link to human trafficking, children and young people may benefit from the principle of non-prosecution.

## 2.5 Information Sharing

This guidance sits within child protection procedures and as such;

Sharing relevant information is an essential part of protecting children. Although those providing services to adults and children may be concerned about balancing their duty to protect children from harm and their general duty towards their patient or service user, **the over-riding concern must always be the safety of the child.** (National Child Protection Guidance 2021)

## 3. Trauma Informed Approach to Support and Intervention

Trauma informed practice means considering the impact of trauma and making adjustments to fit with children's needs, to minimise distress and retraumatisation and maximise building trusting relationships. Trauma can impact on children's ability to engage with child protection procedures. Having an understanding of this and ways to respond can help the child or young person feel supported and safe, and help the workers to gather the required information.

The Scottish Child Interview Model, which is currently being implemented across Scotland, provides guidance on Joint Investigative Interviewing of Child Witnesses in a way that considers developmental factors, the impact of trauma and using a systemic approach to support children before, during and after required processes.

The trauma informed practice framework is organised around 5 R's.

Firstly that **Relationships matter**. Experiences of the interpersonal trauma of abuse and violence involved in child trafficking can have a lasting impact on relationships. But recovery can be helped through repeated experiences of safe, trustworthy and supportive relationships. This includes encounters with professionals through the child protection procedures. Good relationships can be healing.

Workers need to **Realise** that Trafficking can involve multiple trauma experiences and many different forms of trauma including physical violence and threats of violence, witnessing violence to others, sexual violence and rape, emotional abuse, neglect. Trauma usually involves an overwhelming sense of threat and danger alongside a significant breach of trust, coercion, lack of control, powerlessness and domination. Traffickers may also have targeted children who are already vulnerable through early childhood experiences of trauma, loss and adversity.

Workers need to **Recognise** that traumatic experiences can have a range of impacts, Trafficking not only involves multiple trauma experiences but also the removal of children from protective factors such as family and friends, education, community, the support of reliable adults etc. Therefore children are likely to have experienced multiple traumas without the protective factors that can buffer the impact of trauma and adversity.

There can be barriers to children who have been trafficked feeling safe to disclose their experiences. This can include the traffickers grooming or threatening them leaving them too scared to talk. If other people have not been able to protect them previously, they may be reluctant to believe that staff can help them. Traumatic experiences can result in the child experiencing disconnection and

confusion. They can feel isolated and stigmatised by their experiences. These factors can make them doubt that they will be believed by others. They may also feel great guilt and shame about their experiences. They will have been in positions of powerlessness. These aspects can make it hard for them to make disclosures. Depression and the impact of trauma can interfere with memory and make it difficult for them to give an ordered coherent account.

Talking about traumatic experiences can lead to a child re-living their experiences and cause them to experience the same feelings they experienced during the abuse. They may feel overwhelmed with fear or distress which can make it hard for them to talk. They may use the same survival skills that they used at the time such as dissociation or cutting off from the experience in some way which can make it hard to speak of what has happened.

**Respond** Staff are able to listen when a child or young person speaks about their experiences and can respond to them with empathy and think about what help is needed. Staff can hold in mind that a person's behaviour or reactions might be trauma-related. This may mean making sense of a child or young person's current difficulties as survival skills. Trauma can affect children's mental health, physical health, and capacity for learning and life chances. Children and young people should be supported and enabled to access services, supports and interventions to improve safety and recovery. A multiagency response is required. This should take into account the different contexts that are relevant for the young person including: home, health, education, community. Mental health services can be contacted to assess psychological impact of trauma or other mental health concerns and provide help as required.

**Resist re-traumatisation** by ensuring services are delivered in line with principles of: Choice, Collaboration, Trust, Empowerment, Safety. A process can be re-traumatising if aspects of the process by their similarity to original traumas can evoke the same feelings in the child/young person. Thus for example being shut in a room, being questioned by people in authority, seeing police in uniforms etc. Having to recall traumatic memories can also trigger re-living where the child or young person believes the trauma is happening again and experiences the same thoughts, feelings, behaviour that they did at the original time. It is important to make all procedures involving child victims of trafficking **as different as possible** from their abusive and traumatic experiences. All procedures involving children should be characterised by;

- **Safety**

That children and young people are supported to feel safe during each aspect of child protection procedures. This could include having someone with them who helps them to feel safe in an environment that is comfortable. Encouraging the child/ young person to take breaks whenever they need them. Having an agreed way of how the child or someone who knows them well can identify when they are feeling emotionally dysregulated or overwhelmed and what will help them to cope. Making sure the best interests of the child is always paramount.

- **Choice**

That children and young people are given opportunities for exerting some choice during child protection procedures. For example over how they will be involved, over the time of day they attend, where any meetings happen, the gender of the professional that speaks to them etc.

- **Collaboration**

That children and young people are included in the child protection process and understand what is happening and supported to take part in whatever way they can and want to. It can again be helpful to emphasise the importance of their well-being. For example asking them



what they need to help support them through the process, if they already have coping strategies that they can use.

- **Trust**

That interactions support a child or young person being able to trust the professionals involved. For example, being consistent and reliable in your interactions. This can include how the child protection process is explained to them and being clear about your role and doing what you say you will do so that this is predictable for the child or young person. It is also being clear about when there are things that you are not able to do and explaining the reasons for this. It is important to check that the child understands what is happening. In addition, making sure the child or young person understands that you care about them and you want what is most helpful for them.

- **Empowerment**

It is important to involve the children in all aspects of the process and listen to what they are communicating. Working with children and young people in a way that empowers them to make active decisions about the support they receive. For example, that they can put forward their views about what would be helpful and can have their interests, personal strengths and resilience factors built on.

- That all of these trauma informed principles take into account a **child's cultural background**. Staff need to be open to learn about what a child or young person's life has been like, the meaning of what has happened to them and what they would find Helpful Practical examples may include the gender of professionals, including Interpreters

## **And Remembering to Care for staff**

Staff can also be affected by regularly working with people who have experienced trauma. This can impact on staff members own health and well-being and can cause secondary traumatisation. It is therefore important that staff are also supported with good self-care and access to formal and informal support and supervision to help them manage the impact of trauma exposure in the workplace.

## **4. Referring Concerns**

### **4.1 Reporting & Responding to Concerns**

Any worker from any agency or organisation who is concerned that a child or young person may be the victim of Trafficking should contact Police Scotland or Children & Family Social Work. Out of hours Social Work (01631 566491 or 01631 569712), should be consulted in the event of such concerns being raised out of hours.

Agencies and individuals should bear in mind that it is essential to take timely and decisive action where child trafficking is suspected because of the risk of the child being moved.

Often agencies would be expected to obtain the consent of the child's parent or carer regarding any referral. However, in cases where the child may be trafficked, it is possible that their carer is involved in the trafficking or exploitation and seeking their consent could put the child at further risk or lead

to their being moved elsewhere. It is therefore recommended that unless there is clear evidence that seeking consent would in no way harm the child, referring agencies should not seek the carer's consent or consult with parents / carers at the initial stage.

For young people aged 16-18 years it will be the responsibility of the C&F SW Practice Leader to have the conversation with Adult services to agree which service will meet the needs of the young person.

Where any practitioner has reason to believe that a young person may be a victim of trafficking this must be recorded and discussed with a supervisor, child protection adviser or equivalent at the earliest opportunity. The Child Trafficking Matrix (Appendix 2) should be completed by the agency identifying concern and this will assist the Initial Referral Discussion and decision making. All referrals to social work should be followed up in writing using the single agency concern form.

While the following process has been agreed for suspected child trafficking cases the multi-agency child protection procedures remain the primary guidance for the care and protection of children.

- Where a child / young person is suspected or is known to have been trafficked the child's safety is paramount and all necessary child protection actions and procedures should be followed to ensure they are protected.
- Agencies and / or individuals should not wait until a child discloses, agrees or perceives they have been trafficked to initiate procedures. Research to date indicates children, apart from being threatened to remain silent, often are not aware they are victims of trafficking.
- On receipt of a referral, the Children's Services/Adult Services manager will consider the need to instigate an Interagency Referral Discussion (IRD) and will inform the lead officer for child protection so will maintain an oversight and provide guidance if required. The IRD will determine the level of concern/risk and whether action is necessary under child protection procedures or young person support and protection. The IRD will consider how the concerns about trafficking need to be investigated and will also seek to consider the immediate safe care of the young person.
- Where there are concerns that the young person has been/or is at risk of trafficking the need for a child protection or young person support and protection (YPSP) case discussion should be considered. You would do this where there are layers of complexity for example different groups of children targeted, different geographical boundaries.
- In addition to usual key agencies, a member of the UK Border Agency should also be invited if there are immigration / asylum issues. It should be remembered that all information shared at a child protection case discussion is for the purposes of child protection. Information gathered or shared should not be used to progress immigration issues.
- The IRD should consider ongoing risks, agree broad protection actions, and consider the need for a multi-agency response. The IRD will also agree if the case requires to be referred to the Competent Authority through the completion of a National Referral Mechanism form.



- A Child Trafficking Assessment (Appendix 1) should be completed as part of the comprehensive child protection or YPSP investigation and assessment. It is likely there may not be substantial amounts of information at this initial stage (international agencies and organisations may need to be consulted during the assessment stage).

## 4.2 National Referral Mechanism (NRM)

The National Referral Mechanism (NRM) is a UK-wide framework for identifying survivors of human trafficking or slavery, servitude and forced or compulsory labour and ensuring they receive the appropriate support.

If you think that modern slavery has taken place, the case should be referred to the NRM so that the relevant competent authority can fully consider the case. You don't need to be certain that someone is a victim.

The [National referral mechanism guidance: adult \(Northern Ireland and Scotland\) - GOV.UK \(www.gov.uk\)](#) will assist designated first responders (social work and police) in completing the referral form before it is submitted for consideration by the relevant competent authority within the Home Office. Referral forms should be sent using the [online process](#)

The [online process](#) allows first responders to submit an NRM referral through a single online form regardless of their location in the UK, or whether the victim is an adult or child. The form has been designed to be responsive and will change depending on the options selected. [Access the form.](#)

The online form will identify whether someone is a first responder by verifying their work email address. First responders will need to complete this verification to progress with the form.

After submitting the form (which will be sent to the relevant competent authority) the first responder will be sent a link to download a copy. Once it's been received by the competent authority it will be assigned a reference number which will be emailed across to the first responder. If any further information becomes available at a later date that would be helpful in making a decision about whether the person is a victim of modern slavery the first responder can email this, by responding to the referral receipt email without editing the reference number in the subject line.

Once a referral is submitted, the relevant competent authority will then aim to make a reasonable grounds decision within 5 working days wherever possible.

NB where children are not assessed as being trafficked by the Competent Authority there may still be child protection concerns. The possibility of trafficking should not be dismissed at this point as it may be that further information becomes apparent in the succeeding months.

## 4.3 Discussing the Notification of Concern with the Young Person

It is good practice to inform the young person about the notification of concern unless it is impossible to do so or would increase the risk to the young person or others. Decisions should take account of the views of the young person where appropriate.

## 4.4 Other Considerations

### Age Assessment

In cases of child trafficking, questions about the age of a child can often arise. The responsibility for the assessment of age is **the local authority** where the young person is residing and is informed by legislation and guidance.

Section 12 of the Human Trafficking and Exploitation (Scotland) Act 2015 sets out a presumption regarding a child who is presumed to be trafficked. It applies where a Health Board or Local Authority has reasonable grounds to believe that a person is a victim of human trafficking and, while not certain of their age, there are reasonable grounds to think the person may be under 18. In these circumstances, the Board or Authority has to treat that person as a child in relation to certain statutory powers and obligations. They are required to do so unless the person is proven or assessed to be 18 or over. In these cases, a children's service must be provided pending an age assessment being carried out.

### Appointment of an Independent Child Trafficking Guardian

The Human Trafficking and Exploitation (Scotland) Act 2015 (Section 11) has made provision for the appointment of an Independent Child Trafficking Guardian. Independent child trafficking guardians are to be appointed for a child:

- whom a relevant authority has reasonable grounds to believe is or may be a victim of human trafficking;
- whom a relevant authority has reasonable grounds to believe is vulnerable to becoming a victim of human trafficking; and
- For whom no-one in the UK has parental rights or responsibilities.

Standard child protection processes and procedures will continue to be used for those children for whom someone in the UK has parental rights or responsibilities.

Section 11 places a duty to appoint an "Independent Child Trafficking Guardian" to assist, support and represent an eligible child, ensuring they are safeguarded and their rights are protected. This is intended to complement the roles and responsibilities of the existing statutory agencies. An eligible child is a child that a relevant authority determines is unaccompanied (in the sense that no person in the UK hold parental rights or responsibilities in relation to the child) and the authority (based on reasonable grounds) determines that the child is, or may be, a victim of the offence of human trafficking; or that they are vulnerable to becoming a victim of that offence. The Act defines a 'child' as being under 18.

The Scottish Guardianship Service (SGS) currently deliver this service. A referral must be made directly by the Local Authority and further information about the service is available online:

<https://www.aberlour.org.uk/services/scottish-guardianship-service/>

### Independent Legal advice

Where there are concerns that a child or young person has been trafficked, consideration must be given to ensuring the child or young person has access to information and advice from a lawyer about the NRM, immigration issues if relevant, age assessment, compensation and other rights they may have under the relevant legal frameworks.

## 5. Contact Details

**Police Scotland: 999 or via 101**

**A&B Children & Families Social Work**

During office hours – 01546 605517

Evenings and weekends - 01631 566491 or 01631 569712

**Guardianship Service** [Scottish Guardianship Service - Aberlour](#)

**Trafficking Awareness Raising Alliance (TARA)** (female victims of sexual exploitation) 0141 276 7730 (working hours) and 0141 276 7724 (out of hours) [TARA - TARA \(tarascotland.org.uk\)](http://tarascotland.org.uk)

**Migrant Help (male and female victims)** 0141 884 7900 (working hours) and 0141 212 8553 (out of hours) [Scotland@migranthelpuk.org](mailto:Scotland@migranthelpuk.org)

## 6. Acknowledgments

This guidance is adapted from Glasgow Child Protection Committee for Child Trafficking & Exploitation Inter Agency Guidance and Inter-Agency Guidance for Child Trafficking - Child Trafficking Assessment National Referral Mechanism

# Appendix 1.

## Child Trafficking Assessment Questions

*(Questions from Child Trafficking Assessment form, [Inter-Agency Guidance For Child Trafficking - Child Trafficking Assessment National Referral Mechanism \(www.gov.scot\)](#))*

This Child Trafficking Assessment is designed to assess potential victims of trafficking and / or future risk of trafficking. The questions below should be considered and answered as part of the comprehensive assessment of risk and needs. If initial concerns are about trafficking it is likely that the child trafficking assessment is completed first; if other child assessments are being undertaken and suspicions about trafficking become apparent the child trafficking assessment should be completed in conjunction with them to focus on trafficking specific concerns.

It is likely the Child Trafficking Assessment will be informed by the use of the Child Trafficking Matrix (appendix 2) - the matrix is not an exhaustive list of indicators, or an assessment of future risk. Other factors may also be present that are not included on the matrix – e.g. for internal trafficking movement may be between cities and accommodation rather than countries.

If there are indications, or intent, of movement (section 2) and exploitation / abuse (section 3) – the minimum requirements for child trafficking – a referral should be made to the National Referral Mechanism following CPC guidelines. The presence of other indicators may also be sufficient for a referral to the NRM (please discuss with child protection team or trafficking unit). ***When the assessment is completed sections 1 to 10 can be copied into section G of the National Referral Mechanism form as evidence if a referral is being made to UKHTC.***

In completing the assessment remember that background information may be available from agencies and organisations outside the UK – e.g. NGOs working in country of origin; country of origin embassies; social services in countries of origin.

### **1. Background details** ( give a pen picture of the young person within their family / country of origin context)

*Include social / economic circumstances of the family; why child left the family; continued contact with family; any previous work / employment;*

### **2. Movement** (within countries; across borders; across UK; across city; across accommodation. Include details of how travelled; timescales; time at locations etc. entry into trafficking process;– e.g. sold; passage bought; abducted; escape; present accommodation)

- *Trafficking can occur at any stage throughout a child's journey; it is not limited to the final destination.*
- *UK nationals are also vulnerable to internal trafficking (movement between and within cities and between people) and may also be trafficked out of UK*
- *A child may be trafficked through legitimate routes and with legal documents, in addition to covert routes with no documents Child may arrive alone or accompanied.*
- *Once trafficked may be at increased risk for future trafficking*
- *Are child movements restricted and / or accommodation locked?*

**3. Exploitation / abuse** (detail evidence and / or suspicions; types of exploitation; locations; length of exploitation; freedom of movement)

*What is the nature of the exploitation? Where did it occur? Is it ongoing?*

- *Trafficking is a process, not a single event.*
- *Trafficked children may be forced into criminal activity.*

**4. Trafficker(s)** (description; relatives; gender; title; job; names; relationship to child; still in contact etc)

- *Children may remain in contact with the trafficker or the person who brought them into the country.*
- *Contact may be lost only to be recommenced days / months / years later.*
- *Children may describe the trafficker as a 'friend' 'boy/girlfriend'.*
- *Who are the people involved in a child's life*

**5. Means of control** (how has trafficker controlled child; threats (to child & family); grooming; violence, voodoo, oaths, captivity, debt)

- Children may be physically threatened
- Children may be controlled psychologically
- Consider threats to family
- Trafficked children may be groomed

**6. Other risk factors** (likely to be identified from indicator matrix; may include health; other contacts)

- Consider factors that may be concerning, but on their own not indicative / evidence of trafficking
- There are no validated risk assessments for child trafficking
- Children may move in and out of trafficking situations

**7. Agency involvement** (police; social work; UK Immigration and Visas (formerly UKBA); voluntary; overseas; health)

- Agencies may have been previously involved and not identified trafficking as an issue

**8. Views of young person** (if appropriate)

- Children do not usually say they have been trafficked.
- Children may deny any exploitation / abuse
- Children may not consider their experiences exploitative

**9-10. Analysis and conclusions** (VYP/not & reasons, action plan, identify specific outcomes; by whom)

Trafficking is an extremely complex area of child protection and any analysis and conclusions will be subject to change.

***NB Trafficking and its assessment is not a static process - due to the nature of child trafficking it is likely that much of the required information may not be initially available, or sketchy; it is important that the assessment is regularly updated***

