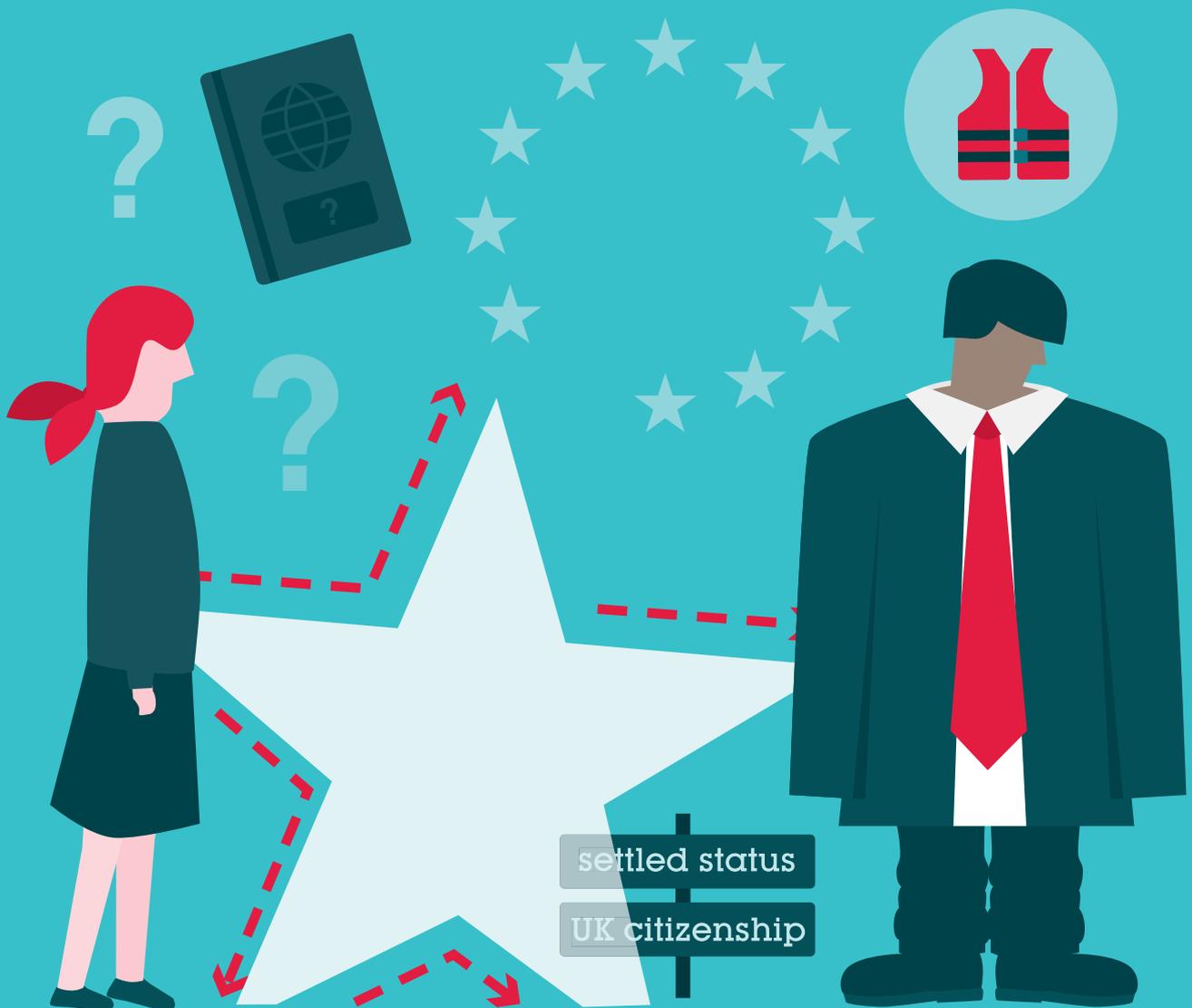


# 5

## State of Children's Rights in England 2018

Immigration, Asylum  
and Trafficking



## Briefing 5

# Immigration, Asylum and Trafficking

**ARTICLE 10** Families whose members live in different countries should be allowed to move between those countries so that parents and children can stay in contact, or get back together as a family.

**ARTICLE 19** Children have a right to be protected from all forms of violence.

**ARTICLE 20** Children separated from their family should be well cared for.

**ARTICLE 22** Children who are seeking refugee status are entitled to special protection and the other CRC rights.

**ARTICLE 32** States Parties should protect children from economic exploitation and any harmful work.

**ARTICLE 34** States Parties must protect children from all forms of sexual exploitation and abuse.

**ARTICLE 35** States Parties should make sure children are not abducted, sold or trafficked.

**ARTICLE 39** Children who experience any exploitation should receive the help they need to recover and reintegrate into society.

**Optional Protocol to the CRC on the sale of children, child prostitution and child pornography** States Parties shall prohibit the sale of children, child prostitution and child pornography, recognise the vulnerability of child victims, protect their privacy, provide support and ensure their safety.

### Definitions and glossary

**Children:** All children and young people under 18 as set out by article 1 of the UN Convention on the Rights of the Child (CRC).

**Separated children:** Children under 18 who are outside their country of origin and have been separated from both parents, or from their previous legal or customary primary caregiver, but not necessarily from other relatives. We use the term "separated children" to include unaccompanied children seeking asylum in the care of local authorities.

**Unaccompanied children:** Unaccompanied children seeking asylum in the care of local authorities, often referred to as 'UASC' by the government.

**Dublin III regulation:** A European Union (EU) law, which determines that EU Member States examine an asylum seeker's application for international protection. It allows signatory states to return asylum seekers to the first country in Europe in which they are known to have been present, and allows for family reunification, particularly in relation to children.

**Undocumented children:** Children who do not have a regular immigration status, in that they do not have permission (leave) to enter or remain in the UK.

**National Transfer Scheme (NTS):** A voluntary transfer arrangement between local authorities to care for unaccompanied asylum-seeking children, launched by the government in 2016.

**National Referral Mechanism (NRM):** A framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support. It is also the mechanism through which the Modern Slavery Human Trafficking Unit (MSHTU) collect data about victims.

## About this briefing

The UK ratified the UN Convention on the Rights of the Child (CRC) in 1991. This means that all areas of government and the state including local government, schools, health services and criminal justice bodies must do all they can to fulfil children's rights.

This briefing is part of CRAE's *State of children's rights in England 2018* and assesses the progress made in England towards implementing the UN Committee's recommendations on immigration and trafficking, which is an area of Special Protection Measures in the CRC. It highlights areas of progress and concern since CRAE's last *State of Children's Rights in England* report published in December 2017. It is based on written and oral evidence from CRAE's members and additional analysis of recent laws and policies, newly published research, official statistics and responses to Freedom of Information (FOI) requests.

### What is the CRC?

The CRC applies to all children aged 17 years and under and sets out the basic things that children need to thrive: the right to an adequate standard of living, to be protected from all forms of violence, an education, to play, be healthy and be cared for. Children's rights should act as a safety net, meaning children always receive at least the minimum standard of treatment whatever the changing economic climate.

The CRC has four guiding principles (General Principles) which are rights in themselves, but also the framework through which all the rights in the CRC should be interpreted. They are: non-discrimination (article 2), the best interests of the child (article 3), survival and development (article 6) and respect for the views of the child (article 12). England's compliance with these General Principles is covered in Briefing 2.

### Concerns of the United Nations

In June 2016 the UK government was examined by the **UN Committee on the Rights of the Child** (the UN Committee) on its compliance with the CRC for the first time since 2008. The UN Committee made a number of recommendations (Concluding Observations) for change. In May 2017 the UK was examined on all its human rights treaties, including the CRC, by the 193 member states of the Human Rights Council as part of the **Universal Periodic Review (UPR)**.<sup>1</sup> This is a process where states can reiterate previous recommendations made by UN Committees and can be used by civil society and parliamentarians as an additional advocacy tool. The government can choose whether to "support" (accept) recommendations or "note" them (reject or not agree). We are very disappointed that the government has only supported 28% of the recommendations relating to children's rights, compared to 42% of all the recommendations it received. Below are the relevant UN Committee and UPR recommendations for this briefing:

- Conduct age assessments only in cases of serious doubt through multidisciplinary and transparent procedures **CRC**
- Establish statutory independent guardians for separated children **CRC**
- Cease the detention of asylum-seeking and migrant children **CRC** **UPR**
- Review its asylum policy in order to facilitate family reunion for unaccompanied and separated refugee children, within and outside of the State Party, including through implementation of the EU Dublin III regulation **CRC** **UPR**
- Strengthen the NRM for identifying trafficked and exploited children, which is embedded in existing child protection procedures **CRC**
- Establish mechanisms and procedures to protect the rights of child victims of offences, including establishing a clear obligation of non-prosecution, and ensuring that they are treated as victims rather than criminals by the law enforcement and judicial authorities **CRC**

#### Key to UPR recommendations:

**UPR** Supported **UPR** Noted

## Introduction

The government has committed to some positive steps to improve the safeguarding of separated children. However, the 'hostile environment' has made it even more difficult for migrant and asylum-seeking children, especially the most vulnerable, to get the support and protection they need. Long-standing concerns by the UN Committee have still not been addressed and the UK's exit from the European Union raises important and worrying questions for EU children living in the UK, including those in care and those with complex family arrangements.

## Where have we made progress?

**The re-instatement of immigration legal aid for unaccompanied and separated children in care is a very welcome development.**<sup>2</sup>

Following a judicial review the Ministry of Justice will amend the Legal Aid, Sentencing and Punishment of Offences Act 2012 (LASPO)<sup>3</sup> so that these children are brought back into the scope of legal aid. This will enable access to legal advice for very vulnerable children.

There have been some positive developments in protections for child victims of trafficking and modern slavery. **The independent review of the Modern Slavery Act 2015, due by March 2019, is a welcome opportunity to strengthen protections for child victims of trafficking and modern slavery.**<sup>4</sup> The Home Affairs Select Committee has gathered evidence of the need to improve operational responses to child victims.<sup>5</sup> The use of the statutory defence clause in Section 45 of the Act has been used successfully to drop criminal charges against child victims. However, there are many offences which are exempt from the statutory defence, which are common in child trafficking cases,<sup>6</sup> and it remains of great concern that children who are clearly identifiable as trafficking victims are still criminalised. Many do not receive the necessary protections and support even when they have been recognised as victims.<sup>7</sup>

The commitment to a 'child friendly' National Referral Mechanism (NRM) is welcome. This should lead to reforms to ensure that the NRM provides real and timely specialist support and durable solutions for child victims, as part of existing multi-agency child protection mechanisms. The introduction of an independent panel to review all negative decisions also has potential to improve decision-making in identifying child trafficking victims.<sup>8</sup>

The revised model of the Independent Child Trafficking Advocates Scheme (ICTAS), aimed at providing specialist support for trafficked children, is being trialled through the introduction of 'Early Adopter sites' before being expanded in April 2019. Positively, the revised scheme will include new ICTA Regional Coordinators who will work with a range of professionals to support individual children. However, by then the service will only be available to eligible children in one third of all local authorities in England and Wales.<sup>9</sup>

## Where do we need to improve?

### Impacts of the 'hostile environment'

The 'hostile environment' has had a negative impact on children's access to education, support and services, exacerbating the inaccessibility of the current immigration system, especially given the lack of legal aid for *all* children in the system.<sup>10</sup> There are also concerns that the punitive immigration environment is making undocumented children and/or those with irregular status more vulnerable to exploitation.<sup>11</sup>

The policy of data-sharing between government departments, the NHS and the Home Office, as an immigration control measure, has led to fears among children and families when accessing schools and health facilities. This is in contravention of the rights of *all* children - regardless of immigration status - to education, healthcare and protection on the basis of non-discrimination.

Doctors of the World has highlighted the effects of NHS charging on families in vulnerable situations, such as undocumented migrants and those whose asylum claim has been refused. **Charges for healthcare have been found to deter women, including pregnant women, from seeking antenatal and other healthcare.**<sup>12</sup> While the government has committed to carry out an assessment of the consequences of such charges, this has not yet happened. Worryingly, the government is considering introducing charges for primary healthcare (including GPs) and in A&E.<sup>13</sup> There has also been severe criticism of Home Office staff being embedded in local councils and present during interviews with migrant families, with fears that this deters destitute families from accessing necessary support, including under Section 17 of the Children’s Act which places a duty on local authorities to ensure the well-being of all children.<sup>14</sup>

**On a positive note, following a legal challenge by campaigners, NHS Digital has agreed not to share confidential data with the Home Office for immigration purposes.**<sup>15</sup> Also, after intense campaigning and legal action, the government has issued new guidance to schools stating that nationality and country of birth data will no longer be required. However, concerns remain over the use of data that is already held.<sup>16</sup>

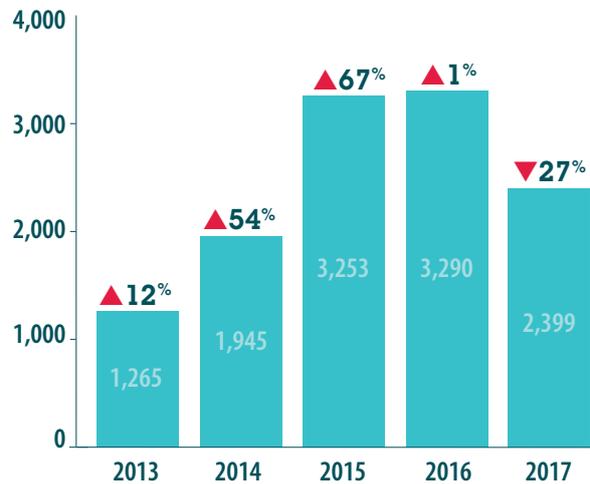
## Immigration and asylum

### No durable solution for unaccompanied children

In 2017 the number of unaccompanied children seeking asylum in the UK dropped by 27% from the previous year.<sup>17</sup> The number of asylum

applications from unaccompanied children from January to September 2018 stand at 1,972, a slight upward trend compared to the same period in 2017.<sup>18</sup>

**Graph 1: Asylum applications from unaccompanied children**



Source: The Refugee Council (2018) *Children in the Asylum System*

In 2017, 56% of asylum-seeking children were given refugee status, and 14.5% were refused.<sup>19</sup> 386 children<sup>20</sup> were granted a temporary form of leave (UASC leave), having been refused asylum, despite consensus that temporary leave is rarely in children's best interests as it does not provide a durable solution for them.<sup>21</sup>

2017 saw a significant increase in the number of children seeking asylum from Sudan and Vietnam, but decreases from the other top countries of origin, namely Eritrea, Iraq, Albania, Iran, Afghanistan, Ethiopia and Syria.<sup>22</sup> 89% of unaccompanied children's asylum applications were from boys.<sup>23</sup>

**Table 1: Initial asylum decisions for unaccompanied children aged 17 and under, 2017**

	Total	Refugee status	Humanitarian Protection	Discretionary Leave	UASC Leave	Family or Private Life	Refusals
<b>Eritrea</b>	355	343	0	0	4	0	8
<b>Afghanistan</b>	326	128	11	2	140	0	45
<b>Iraq</b>	158	36	15	0	74	1	32
<b>Iran</b>	136	47	0	0	52	0	37
<b>Sudan</b>	127	112	0	0	7	0	8
<b>Vietnam</b>	94	45	7	0	29	0	13
<b>Albania</b>	58	1	0	0	32	0	25
<b>Ethiopia</b>	53	37	0	0	9	0	7

Source: The Refugee Council (2018) *Children in the Asylum System*

### Systemic and traumatising delays in the asylum system

**Systemic delays in the asylum system are having a devastating impact on asylum-seeking children, with many waiting for 18 months or even two years for a decision.** This leads to high levels of stress and anxiety, affecting children's mental health, education, relationships with peers and their ability to plan for their future.<sup>24</sup> The suicide of three asylum-seeking teenagers raises serious questions about the asylum system's ability to safeguard vulnerable children and young people, especially when they are already dealing with the trauma of fleeing to the UK and with protracted uncertainty about their status and their lives.<sup>25</sup>

### Ongoing concerns about National Transfer Scheme

**Despite the roll-out of the National Transfer Scheme (NTS) across the UK, there continue to be concerns about its effectiveness.** These include delays in transferring children and young people, the lack of a 'best interests' assessment for every child, and delays in access to vital statutory services for them. In addition, there is evidence of poor communication with children and foster carers about the transfer process, a lack of clarity as to when age assessments are needed and confusion over the voluntary nature of the scheme.<sup>26</sup> A report by the Independent Chief Inspector of Borders and Immigration highlighted the impact of delays in determining a child's 'best interests' leading to problems with accessing education, legal advice and specialist healthcare, and the increased risk of children going missing if they did not want to be transferred.<sup>27</sup> The inspection also found that children's views were often absent from the transfer assessment process and that Home Office staff were not giving full consideration to children's best interests in refusal letters. Insufficient funding was also cited by local authorities as a barrier to the effectiveness of the NTS.<sup>28</sup>

Since then the government has announced an additional £29 million for local authorities in England to support unaccompanied asylum-seeking children.<sup>29</sup> The Home office has issued a revised National Transfer Scheme Protocol and revised guidance on dealing with applicants whose age is disputed, with some improvements.<sup>30</sup>

### Slow access to education for migrant children

**A study showed that not one region of the UK had met the 20 school-day target for access to education for all unaccompanied children in their care, with most delays happening at secondary and further education.** Local authorities in the UK have a duty to provide a school place for all school aged children, irrespective of their legal status. In the face of these delays, several local authorities had to develop interim provision for unaccompanied and resettled children. Barriers to access have included long waiting lists for places, complex application procedures, a reduction of teams with expertise, a lack of places for children with special educational needs and schools' fears of a negative impact on their academic results.<sup>31</sup> Research found that children undergoing age dispute assessments faced increased barriers to education, with just under a quarter of those studied waiting for a school placement or deemed ineligible as a result. Despite all denials being overturned in appeal, these cases highlight the barriers that many unaccompanied children face in accessing education.<sup>32</sup>

### Barriers to mental health support for unaccompanied asylum-seeking children

Unaccompanied asylum-seeking children often face trauma, violence or exploitation while fleeing their home country, developing a range of mental health issues that need specialist treatment. These include Post Traumatic Stress Disorder, sleep disturbance, social isolation, self-harm and suicide.<sup>33</sup> These children face multiple barriers to accessing mental health support. Their mental health needs are often not identified, with processes such as the Strengths and Difficulties Questionnaire not being sufficiently robust, and a lack of awareness and training among paediatricians, GPs, social workers and others. The 'hostile environment' policies have also made it more difficult for them to access NHS services and education, while cuts to legal aid have created more barriers, leading to further mental health distress.<sup>34</sup>

### Children still held in immigration detention

Despite the Home Office's *Enforcement Instructions and Guidance* listing children as 'unsuitable' to be placed in immigration detention centres,<sup>35</sup> some minors continue to be detained.

The number of children entering detention has dropped sharply since 2009, but in the twelve months to September 2018, 60 children were held in immigration detention, despite the government's promise to end this practice.<sup>36</sup> This is concerning, in a system that is not in the child's best interest and breaches article 37 of the CRC that prohibits 'cruel and harmful' punishment or detention,<sup>37</sup> alongside the UN Committee's call to end all detention of asylum seeking and migrant children.

### Fewer cases of age disputed children but numbers still high

**In 2017, 716 unaccompanied children had their age disputed, a drop of 23% from 2016, although this constituted 30% of overall child asylum claims, up from 28% in 2016.<sup>38</sup>**

**While this is welcome it still represents a high number of children who are disbelieved regarding their age.** These children face harmful, protracted age disputes despite calls from the UN Committee, which states: '*age assessments should only be conducted in cases of serious doubt.*' It is of some concern that 2017 rates remain significantly higher than 2012/2014 annual figures.<sup>39</sup> Children from six countries (Afghanistan, Eritrea, Iraq, Sudan, Iran and Vietnam) accounted for 80% of age disputed cases in 2017. The Home Office's *Assessing Age* policy allows for individuals claiming to be children to be treated as adults if their appearance '*strongly suggests they look significantly over 18*<sup>40</sup> despite the inherent difficulties in judging age based on appearance. Statutory guidance on unaccompanied migrant children states that '*where the age of a person is uncertain and there are reasons to believe they are a child, that person is presumed to be a child.*<sup>41</sup> Age assessment guidance by the Association of Directors of Children's Services (ADCS)<sup>42</sup> also states that children should have access to local authority support as a looked after child whilst the age assessment process continues, as confirmed by recent case law.<sup>43</sup>

### Slow progress on Dublin III

A child's right to reunite with their family is enshrined in article 10 of the CRC. However, improvements are needed in the guidance to identify children who are entitled to family reunification in the UK. Organisations are reporting that a number of children whom they support in being reunited with families are not

offered comprehensive needs assessments by local authorities' children's services teams. Additionally, this support is inconsistent. Families are often not given necessary financial and accommodation support while children are not linked in to relevant education and health services. The statutory support that is usually offered in private fostering arrangements is often not replicated for children who are reunited with family members.<sup>44</sup> The government has recognised these issues in its *Safeguarding strategy for unaccompanied asylum seeking and refugee children*, and committed to developing further guidance specifically for families reunited under Dublin III, but this has not yet been finalised. It is still not clear whether there will be a commitment to provide these families access to mainstream welfare support or support for the children in their care through Section 17 of the Children Act 1989.

**There are also ongoing questions about future provisions for unaccompanied asylum-seeking children joining their parents or other relatives residing in the UK, after the UK leaves the EU, as the UK will no longer be party to Dublin III, and there are no comparable provisions or concrete plans yet, even in the event of a 'no deal' Brexit.**

### Limited progress on relocating unaccompanied children from Europe

The Court of Appeal upheld the government's cap on the number of vulnerable unaccompanied children who could relocate from Europe to the UK. The Home Office set the limit to 480 asylum seekers under the age of 18, under Section 67 of the Immigration Act 2016 (the "Dubs amendment")<sup>45</sup>, in line with Section 67 itself. More than 220 have been relocated so far.<sup>46</sup> The Court did concede that there had been a breach of the '*duty of fairness*' in the process, as those children who were refused entry were not given reasons. They will now be entitled to know why and to appeal.<sup>47</sup>

The government also agreed to transfer unaccompanied children from the Calais camp to the UK. 769 unaccompanied children have been transferred from France to the UK, 549 of whom have been transferred to reunite with family members in the UK.<sup>48</sup> This is welcome. However, this so-called 'Calais Leave' only applies to children

transferred to the UK between 17 October 2016 and 13 July 2017, and provides entitlement to study, work, access public funds and healthcare, but does not represent a durable solution, as they must apply for settlement after ten years.

### No progress on extending family reunion

The UK, unlike almost every other country in the EU, still does not allow children with refugee status to sponsor their parents to join them. This is despite the fact they have been through an asylum determination process in the same way as an adult. Despite calls by the UN Committee for the UK to review its asylum policy to facilitate family reunion for unaccompanied and separated refugee children there has been no progress towards this.<sup>49</sup> A Private Members Bill, supported by the Families Together Coalition, received cross-party support but has yet to progress due to lack of parliamentary time.

### Brexit a threat to EU children's residence rights

**There are more than half a million European Union (EU) national children living in the UK, many of whom were born here. There is still a lack of clarity over whether the Brexit arrangements will safeguard the rights of these children.** The government has stated its intention to allow EU nationals who have resided lawfully in the UK for five years or more to apply for 'settled status' (with a right to appeal), and that the system will be user friendly.<sup>50</sup> However, this is subject to the final outcome of Brexit negotiations and there are ongoing concerns that many children will face difficulties. These include children in care or leaving care, or children who

are dependent on the rights of their parent(s) to make an application, and those with unresolved immigration issues. There are also concerns that many families with children may not know that they have to apply for 'settled status' and will not have access to the necessary information to do so. Without legal advice and community-based support those with complex cases will face particular problems.<sup>51</sup> The fact that many local authorities do not know how many children in their care are EU nationals raises serious questions about their ability to identify and support these children with their applications.

### Poor routes to regularisation for undocumented children

**There are an estimated 144,000 undocumented migrant children living in England and Wales. Like the Windrush generation, many who came to the UK as children or were born here are now facing a precarious situation and exorbitant costs to regularise their status.**<sup>52</sup> Some have been threatened with forced removal to countries that they have little connection with.<sup>53</sup> The application fees for settlement<sup>54</sup> coupled with the doubling of the NHS surcharge announced by the government in October 2018 represent prohibitive costs for many.<sup>55</sup> Under the current system, children and young people who want to regularise their status and settle in the UK have to make five applications, wait ten years and pay over £10,000.<sup>56</sup> This discriminates against those with limited means, makes regularisation inaccessible, protracted and costly for many, and does not represent children's best interests, pushing them into undocumented status.

For more information on the best interests of children in the asylum and immigration system see Briefing 2.

## Trafficking

### High numbers of trafficked children

While there are no accurate numbers, the government estimates there are 13,000 victims of modern slavery nationally, of which more than 4,000 are thought to be children.<sup>57</sup> However, the National Crime Agency has said the actual number for both adult and child victims could be



## Case study

### Just for Kids Law

#### Barriers to securing legal status for 17 year-old

'Paul\*', who was not in scope for immigration legal aid, received immigration advice shortly before his 18th birthday in 2017. After receiving pro-bono advice and representation he was able to submit an application for leave to remain to the Home Office on the basis that he was under 18, had lived in the UK for seven years and that it was unreasonable to expect him to leave the country. He couldn't afford the immigration fees of £993 and the Immigration Health Surcharge of £500 but was able to raise the money for his application with support from his school. He didn't want to make an application for a fee waiver, given the unpredictability of the Home Office's decisions regarding fee waivers. Had the Home Office refused to grant one, he would not have been able to raise the fee within 10 days and would, at that point, have been over 18 and not eligible for leave under the immigration rules. The application was outstanding for 11 months during which time he was unable to take up an unpaid work placement, as he had hoped. Finally, he was granted limited leave to remain and will now have to undertake the 10-year route to indefinite leave to remain.

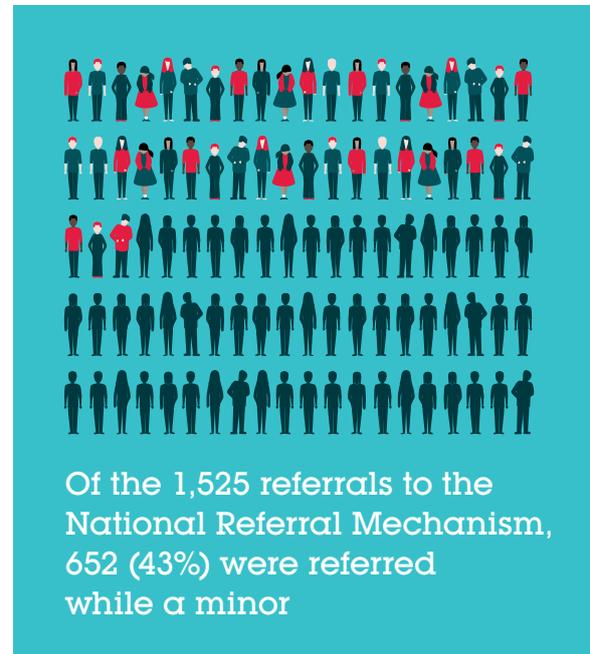
\* Not his real name

much higher. In 2017, there were 2,118 children referred to the National Referral Mechanism (NRM), the system for identifying victims of trafficking and modern slavery.<sup>58</sup> In 2017, of all the children referred to the NRM, 32% were from the UK, followed by 17% from Vietnam, 10% from Albania, 7% from Sudan and 6% from Eritrea.<sup>59</sup> The increase in UK children being referred to the NRM reflects increased awareness of UK children as victims of trafficking, including an increase in the number subject to sexual and criminal exploitation.<sup>60</sup> In 2017, two thirds of children identified as potential victims were male, compared to 38% female. As the NRM does not provide age-specific data, it is difficult to ascertain age-specific trends.<sup>61</sup> As highlighted in last year's report, child victims of trafficking are also at high risk of going missing from the care system.

Funding cuts have also made it more difficult for local authorities to provide the necessary support to vulnerable children, including victims of trafficking and modern slavery. This has eroded their ability to provide prevention, training and early intervention services, thereby increasing the burden of intervention at crisis point.

## National Referral Mechanism (NRM) still failing children

**Despite the government's commitment to make the NRM decision-making process "child-friendly", there are continuing worries that the system is not providing the necessary support to child victims of trafficking.** 'Positive grounds' decisions often do not lead to concrete material benefits for children's experience of social care, of the immigration process or of the criminal justice system. While there is dedicated funding for specialist support services for adult victims, there is no similar central funding for child victims who instead have to rely on support by already stretched local authority children's services.<sup>62</sup>



Source: National Crime Agency (2018) *National Referral Mechanism Statistics Quarter 2, 2018, April to June*

## Recommendations

1. The government should review its 'leave' policies for unaccompanied children and ensure that all decision-making in children's asylum cases always takes their best interests into account and aims to provide a durable solution for children's protection and well-being.
2. The government should ensure that local authorities accepting unaccompanied children under the NTS are sufficiently trained to support the needs of these children and have sufficient resources to do so. The best interests assessment must be an ongoing process and transfers should not be pursued where it would not be in the child's best interests. Local authorities must ensure that they provide support to these children in the same way they support all children. This includes making sure that children have a complete care plan and access to the support and services they need, during and after the transfer process.
3. The government should renew and fulfil its commitment to ending the immigration detention of all children.
4. Age assessments should not be based solely on visual appearance and if a local authority has decided to assess the age of a child, the child should be looked after under Section 20 of the Children Act 1989 during the age assessment process.
5. Where it is not possible to directly incorporate existing EU regulations that rely on multilateral agreements, such as Dublin III, the government must endeavour to replicate the agreements and guarantee that negotiations to do so will protect existing children's rights.
6. In its guidance on the care of children being placed with family members through Dublin III regulation, the government must make it clear that they are entitled to funding through mainstream welfare support, or give guidance to local authorities on the support they should be offering under Section 17 of the Children's Act 1989.
7. The government should review and amend the Immigration Rules for unaccompanied children so that they are in line with adults who are granted refugee status or humanitarian protection and can bring family members to the UK to join them.
8. The government should ensure that all EU children and families are able to access the 'settlement scheme' through a simple process that ensures that parents and carers are aware of the need to register and are supported to do so. Provision must be made to ensure that those who are in vulnerable situations, or have difficulties accessing the scheme, are provided with support and legal advice, free of charge where required. Children must also be able to apply for 'settled status' in their own right.
9. The government should commit to protecting EU national children's citizen rights in the event of a 'no deal' Brexit.
10. The government should introduce a shorter route to permanent status for long-resident children and lower application fees that do not make a profit for the Home Office.
11. The government should reform the NRM for children and ensure that decisions on whether a child has been trafficked are made by trained multi-agency child protection services, and ensure rights-based training for all frontline professionals.
12. There must be specialist care and support for trafficked children, including accommodation and access to mental health support. Local authorities must ensure the right support is provided following a positive NRM decision.
13. The government must improve data collection on child trafficking and ensure that data is disaggregated by age and type of exploitation, with a system to monitor the outcomes of children referred into the NRM.

## Endnotes

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- 28 *Ibid*
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## About CRAE

The Children's Rights Alliance for England (CRAE), part of Just for Kids Law, works with over 100 members to promote children's rights and monitor government implementation of the UN Convention on the Rights of the Child.

We believe that human rights are a powerful tool in making life better for children. We fight for children's rights by listening to what they say, carrying out research to understand what children are going through and using the law to challenge those who violate children's rights. We campaign for the people in power to change things for children. And we empower children and those who care about children to push for the changes that they want to see.

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