MODERN SLAVERY & HUMAN RIGHTS | POLICY & EVIDENCE CENTRE

Led by the University of Oxford

Understanding the Online Recruitment of Children into Criminal Exploitation in the UK: A Gap Analysis of the Legislative, Policy and Guidance Framework

Supplementary Report

November 2026

Author: Hannah Stott



Research by

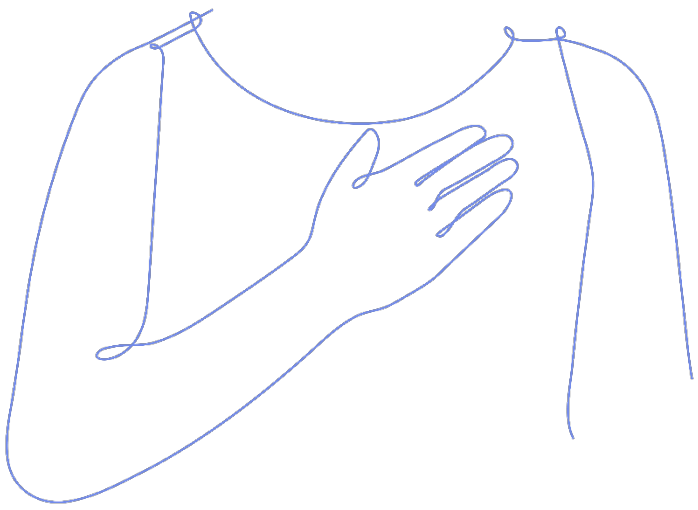
safe to grow

Acknowledgements

The author would like to thank the Modern Slavery and Human Rights Policy and Evidence Centre's Lived Experience Advisory Panel (LEAP) for their contributions to this piece of research.

Funding

This research is funded and supported by the Modern Slavery and Human Rights Policy and Evidence Centre (PEC), University of Oxford, which in turn is funded and supported by the UK Arts and Humanities Research Council (AHRC). The views expressed in this report are those of the author and not necessarily those of the Modern Slavery and Human Rights Policy and Evidence Centre, the University of Oxford, or the Arts and Humanities Research Council.



Contents

1. Introduction 3
1.1 What is Child Criminal Exploitation? 4
2. Methods 6
3. Findings 14
3.1 Legislation, Policy and Guidance: The challenges 15
3.1.1 System fragmentation and parallel pathways 16
3.1.2 Poor visibility of online harms 17
3.1.3 Variable implementation of child protection frameworks 18
3.1.4 Fragmented criminal offence framework 19
3.2 Legislation, Policy and Guidance: The three domains 20
3.2.1 Domain 1: Regulating online spaces and data protection 20
3.2.2 Domain 2: Safeguarding and protecting children 29
3.2.3 Domain 3: Preventing crime and prosecuting offenders 44
3.3 Legislation, Policy and Guidance – Bearings for the future 67
3.3.1 Uncertainty about the relationship between CCE and modern slavery, human trafficking and exploitation frameworks 67
3.3.2 Increasing complexity in perpetrator disruption and prosecution 68
3.3.3 Dispersed data and intelligence 68
4. Conclusions 69
5. Recommendations 70

1. Introduction

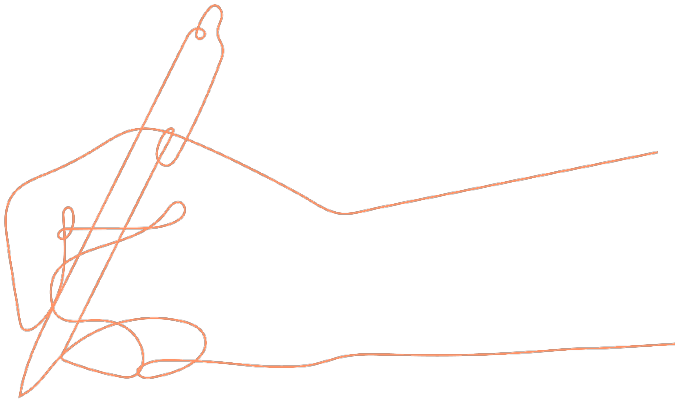
Every child has the right to safety, to be protected from violence, abuse and neglect, human trafficking, and other forms of exploitation[1] - in both online and offline worlds.

Child Criminal Exploitation (CCE) and online recruitment into criminal exploitation are growing threats to the rights and safety of children. Recent inclusion of a CCE offence into the Crime and Policing Act 2026 highlights the increasing recognition of this harm, and follows earlier UK legislation, relating to modern slavery, human trafficking and exploitation, which in part address the issue. The legal and policy landscape has developed incrementally, raising questions about whether the current legal framework provides a coherent and comprehensive response to online recruitment into criminal exploitation.

This report presents the findings of a gap analysis, undertaken between January and August 2026. The gap analysis involved a systematic review and assessment of existing legislation, policy and guidance against the requirements for effectively preventing and responding to the online recruitment of children into criminal exploitation.

Specifically, the gap analysis aimed to:

- *Explore how online recruitment into Child Criminal Exploitation fits within current UK legal definitions, law, policy and guidance frameworks and whether gaps exist.*
- *Include how online harm is prevented, how children are identified and protected and how perpetrators can be disrupted and prosecuted.*



[1] United Nations (1989) *Convention on the Rights of the Child.* Available at: https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf

The purpose of this report is to provide an overall assessment of the relevant regulation and identify where gaps present. These gaps have far-reaching consequences, because fragmented regulations can prevent authorities from effectively identifying children who are at risk and from tackling exploitation.

1.1 What is Child Criminal Exploitation?

To date, no single definition of CCE has emerged that is shared across legislation, policy and guidance. Conceptually, CCE can be viewed in several ways: as a model of exploitation, with a focus on how it can be prevented; as a risk category, centred on who needs protecting, or as an offence framework which considers what and who can be prosecuted.

In 2015, modern slavery legislation was enacted in England and Wales[2] and human trafficking and exploitation legislation in Scotland[3] and Northern Ireland.[4] Although criminal exploitation is not included as a named exploitation type, this legislation has been central to the identification and support of children recruited into CCE, where human trafficking and other modern slavery offences apply. A key feature of the UK's modern slavery, and human trafficking and exploitation legislation is that it defines exploitation broadly, allowing authorities to address emerging forms of harm, and courts to consider new methods of coercion and control that were not specifically included when the legislation was drafted.

In 2019, changes were introduced to the way exploitation types could be recorded via the National Referral Mechanism (NRM), the framework in the UK for identifying and supporting victim-survivors of modern slavery, including human trafficking. For the first time, the Home Office enabled multiple exploitation types to be chosen for any individual referred, and separated CCE from labour exploitation, recognising CCE as a human trafficking or modern slavery offence in their own right, depending on circumstances.[5]

[2] United Kingdom Parliament (2015) *Modern Slavery Act 2015*. Available at: https://www.legislation.gov.uk/ukpga/2015/30/contents
[3] Scottish Parliament (2015) *Human Trafficking and Exploitation (Scotland) Act 2015.* Available at: https://www.legislation.gov.uk/asp/2015/12/contents
[4] Northern Ireland Assembly (2015) *Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.* Available at: https://www.legislation.gov.uk/nia/2015/2/enacted
[5] Home Office (2025) *Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, end of year summary 2025.* Available at: https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2025/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2025

Since that time, the most frequently identified exploitation type for children referred into the NRM has been CCE. In 2025, 3485 children were referred for the exploitation type of CCE, making up fifty percent of all child referrals into the NRM that year.[6]

In the UK Government's Serious Violence Strategy (2018), Child Criminal Exploitation is defined as occurring:

"*where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity a) in exchange for something the victim needs or wants, and/or b) for the financial or other advantage of the perpetrator or facilitator and/or c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual.*"[7]

The Strategy notes that this *'is common in county lines'* and, of important relevance to this gap analysis, that:

'Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.'

In 2021, Barnardo's and The Children's Society (2021) called for a statutory definition of CCE to be added to the Police, Crime, Sentencing and Courts Bill 2019-2021.[8] In their view, this would further aid understanding and awareness of CCE, effectively safeguard children and disrupt harm.[9] A definition was not developed at the time of writing.

The passage of the Crime and Policing Bill 2024-2026 provided another opportunity to advocate for a statutory definition of CCE, by interested parties. The Act fell short in this respect, but the UK Government has committed to introducing a legal definition of CCE in guidance that will accompany the law.[10] The Act does however create an offence of CCE, where an adult uses a child to commit

[6] Home Office (2025) *Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, end of year summary 2025.* Available at: https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2025/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2025

[7] Home Office (2018) *Serious Violence Strategy.* Available at: https://assets.publishing.service.gov.uk/media/5acb21d140f0b64fed0afd55/serious-violence-strategy.pdf

[8] Barnardo's (2021) *Briefing on introducing a statutory definition of Child Criminal Exploitation (CCE) - Police, Crime, Sentencing and Courts Bill.* Available at: https://www.barnardos.org.uk/sites/default/files/2021-05/Briefing%20on%20introducing%20a%20statutory%20definition%20of%20CCE%20-%20PCSC%20Bill.pdf

[9] The Children's Society (2019) *Defining Child Criminal Exploitation.* Available at: https://www.childrenssociety.org.uk/information/professionals/resources/defining-child-criminal-exploitation

[10] The Children's Society (2026) *Explaining the new law on child criminal exploitation.* Available at: https://www.childrenssociety.org.uk/what-we-do/blogs/explaining-the-new-law-on-child-criminal-exploitation

criminal activity.[11] In addition, offences of cuckooing and internal concealment are included,[12] both of which have been linked to the exploitation of children for criminal gain.

As there is currently no single statutory definition of CCE, this review considers different stages in the continuum of exploitation, alongside related perpetrator behaviours and linked criminal offences. The continuum includes targeting and identification, contact and relationship building, grooming, testing and initial involvement, exploitation and control, entrapment and continued exploitation. Particular attention is given to online recruitment methods harnessed by offenders.

This framework provides a structured approach to analyse the legislation, policy and guidance relevant to the prevention and protection of children at risk of online recruitment for the purposes of criminal exploitation, and the prosecution of offenders. Reference is predominantly made to the four UK nations, as well as to European and international frameworks where these have influenced the development of domestic responses.

2. Methods

The desk-based research employed a systematic approach to identify legislation, policy and guidance across the four UK nations, relevant to CCE and, European and international laws where they have influenced the UK's response.

Currently, the UK legislative framework applied to the online recruitment of children into criminal exploitation cuts across digital services regulation and data protection, children's rights and child protection, and crime prevention and prosecution. Key laws such as those covering modern slavery, human trafficking and exploitation, online safety, serious crime and child protection guide the response. Others, such as those relating to weapons and firearms, drug offences and proceeds of crime for example, provide an important, but subsidiary role in identifying and protecting children at risk of online recruitment into criminal exploitation.

[11] United Kingdom Parliament (2026) *Crime and Policing Act 2026*. Available at: https://www.legislation.gov.uk/ukpga/2026/20/contents/enacted
[12] United Kingdom Parliament (2026) *Crime and Policing Act 2026*.

The review included several types of documents, as follows:

Convention: A legally binding international agreement between countries that sets out shared standards, principles or obligations on a particular issue.

Directive: An agreement by European Union member states outlining what they must achieve, but not exactly how they must do it.

Act: A law that has been debated and approved by Parliament and received Royal Assent from the Monarch. An Act creates legal duties, establishes offences, gives power to organisations and provides a legal framework.

Regulation: A detailed set of rules outlining how the powers or duties outlined in an Act are to operate.

Guidance: An explanation about how legislation and legal duties should be interpreted and implemented in practice.

Code: A set of standards, processes or practices that organisations are expected to follow to meet their legal obligations.

Framework: An overarching structure that brings together legislation, policy, governance, principles, roles, responsibilities and mechanisms for implementation around a shared purpose.

Strategy: A high-level overview of what an organisation is trying to achieve.

Plan: A detailed overview of how an organisation is going to achieve its operational goals.

Table 1 summarises the documents sampled for review, by geographical area, document type, focus and name. In total, 59 documents were included.

Geographical area	Type of document	Category of document	Title of document
United Kingdom	Legislation	Human Rights	• Human Rights Act 1998
	Legislation	Modern Slavery and Human Trafficking and Exploitation	• Modern Slavery Act 2015 (England and Wales) • Human Trafficking and Exploitation (Scotland) Act 2015

			• Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015
	Guidance	Modern Slavery	• Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland (2026)
	Regulation	Modern Slavery and Human Trafficking	• The Slavery and Human Trafficking (Definition of Victim) Regulations 2022
	Strategy or Plan	Modern Slavery and Human Trafficking and Exploitation	• Home Office Action Plan on Modern Slavery • Scotland's Trafficking and Exploitation Strategy 2025 • Northern Ireland Modern Slavery and Human Trafficking Strategy 2024 - 2027
	Plan	Criminal Exploitation	• Department of Health Child Criminal Exploitation Plan 2024
	Legislation	Digital Regulation	• Digital Economy Act 2017 (UK-wide with some exemptions)

			• Online Safety Act 2023
	Codes	Digital Safety	• Information Commissioner's Office Age-Appropriate Design Code| • Protection of children code of practice for user-to-user services • Protection of children code of practice for search services
	Regulation	Data Protection	• Regulation (EU) 2016/679 of the European Parliament and of the Council
	Legislation	Data Protection	• Data Protection Act 2018 • Data Use and Access Act
	Legislation	Child Protection	• Children Act 1989 • Children (Scotland) Act 1995 • The Children (Northern Ireland) Order 1995 • Children Act 2004 Social Services and Well-being (Wales) Act 2014 • Children and Young People (Scotland) Act 2013 • Children's Services Cooperation Act

			(Northern Ireland) 2015 • Children and Social Work Act 2017 • Children Scotland Act 2020 • Children's Wellbeing and Schools Act 2026
	Guidance	Child Protection	• Working Together to Safeguard People: Code of Safeguarding Practice 2022 (Wales) • National Guidance for Child Protection in Scotland 2023 • Cooperating to Safeguard Children and Young People in Northern Ireland 2024 • Working Together to Safeguard Children 2026 (England) • Keeping children safe in education 2025
	Framework	Child Protection	• Children's Social Care National Framework (2026)
	Legislation	Crime Prevention	• Malicious Communications Act 1988 • Malicious Communications Act (Northern Ireland) Order 1988

			• Communications Act 2003 • Online Safety Act 2023 – Part 10: Communications Offences • Sexual Offences Act 2003 • The Sexual offences (Northern Ireland) Order 2008 • Sexual Offences (Scotland) Act 2009 • Firearms Act 1968 (not UK-wide) • Offensive Weapons Act 2019 • Crime and Policing Act 2026 (England and Wales) • Misuse of Drugs Act 1971 • Criminal Justice and Licensing (Scotland) Act 2010 • Serious Crime Act 2015 • Police, Crime, Sentencing and Courts Act 2022 • Fraud Act 2006 • Proceeds of Crime Act 2022

Europe	**European legislation and policy were included to reflect their influence on the development of UK domestic legislation and policy, and to provide contextual understanding of the evolution of the current UK legislative and regulatory framework.**		
	Convention	Human Rights	• Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights)
	Convention	Human Trafficking	• Council of Europe Convention on Action against Trafficking in Human Beings and its Explanatory Report (2005)
	Directive	Human Trafficking	• Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims (2011)
	Convention	Sexual Exploitation and Abuse	• Council of Europe Convention on Cybercrime (Budapest Convention) 2001 • Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention) 2007
	Legislation	Digital Regulation	• Digital Services Act 2022
	Regulation	Data Protection	• Regulation (EU) 2022/2065 of the

			European Parliament and the Council of 19 October 2022 on a Single Market for Digital Services (Digital Services Act)
International	Convention	Children's Rights	• United Nations Convention on the Rights of the Child 1989
	Convention	Children's Rights	• The Convention on the Rights of the Child, General Comment No. 25 2021
	Convention	Human Trafficking	• Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime 2000

To aid the research process, a matrix was designed, and gathered data mapped across a range of categories, as follows:

- Category of the document
  - Digital Safety
  - Data Protection
  - Human Rights
  - Children's Rights
  - Child Protection
  - Child Criminal Exploitation
  - Modern Slavery, Human Trafficking and Exploitation
  - Sexual Exploitation and Sexual Abuse

    - Crime and policing
- Geographical area covered
- Type of document
- URL link to document
- Relevance of document in terms of the type of exploitation referenced:
    - Online exploitation broadly
    - Child Sexual Exploitation and Abuse explicitly
    - Online recruitment/exploitation for Child Sexual Exploitation and Abuse explicitly
    - Child Criminal Exploitation explicitly
    - Online recruitment/exploitation for Child Criminal Exploitation explicitly
- Role in the prevention of harm
- Role in the protection of victim-survivors
- Role in prosecuting crime
- Strengths
- Gaps
- Summary of what this means for children

The sampled documents and data management approach reflect the complex nature of CCE and its intersection with other exploitation types and criminal offences.

3. Findings

Child Criminal Exploitation (CCE) sits at an intersection of digital services regulation and data protection, children's rights and child protection, and crime prevention and prosecution. The review identified a number of presenting challenges within the legislative framework and several findings which will impact the future response to child exploitation more broadly.

The findings have been structured with each section starting with key findings, followed by analysis and discussion. The 'Domains' under heading 3.2 include an overview of relevant legislation, policy and guidance, and its relation to online recruitment of children into criminal exploitation. This is followed by a matrix outlining the legislation, policy and guidance, alongside identified strengths and gaps of each.

3.1 Legislation, Policy and Guidance: The challenges

Key Findings

1. The principal challenge is not a lack of legislation, but the fragmentation of legal, regulatory, safeguarding and criminal justice responses to online recruitment into criminal exploitation.

2. The absence of a consistently applied understanding of Child Criminal Exploitation has contributed to variation in identification, support and justice outcomes for children.

3. New legislative developments may improve recognition of Child Criminal Exploitation but also risk creating additional complexity across existing modern slavery, human trafficking and exploitation frameworks.

4. Children commonly experience multiple and overlapping forms of exploitation, yet legal and policy responses frequently silo harms as separate categories, potentially missing and misunderstanding harms experienced by children recruited into exploitation.

5. A more coherent, child-centred and cross-system approach is required to ensure children recruited online into criminal exploitation are consistently identified, protected and supported, and perpetrators brought to justice.

The review demonstrates a substantial legal and policy framework across the UK which is capable of addressing the online recruitment of children into criminal exploitation in both online and offline worlds.

The UK has new legislation focusing on digital regulation, including enforcement powers, and support to improve online services. Alongside this are strict data protection laws and regulations. The UK has a robust child protection framework strengthening over time, to align with emerging forms of harm, including, harm beyond the home. A far-reaching criminal offence framework covers different offending behaviours related to online recruitment of children into criminal exploitation. A policy shift has happened, requiring increased focus on children's wellbeing, rights and participation.

However, the effectiveness of the current legal and policy framework governing the online recruitment of children into criminal exploitation is hindered by fragmented systems, inconsistent recognition and uneven implementation. These factors undermine the systems and practices the law seeks to shape and consequently limits the achievement of positive outcomes for children.

3.1.1 System fragmentation and parallel pathways

To date, no single definition of Child Criminal Exploitation (CCE) has emerged that is shared across the legislative, policy and guidance landscape. As identified by ECPAT UK (2025) inconsistent definitions relating to child exploitation undermine identification and protection. Rigid definitions relating to modern slavery leave many children unrecognised.[13] These factors adversely impact the support offered to children when they are identified, alongside the means through which perpetrators are brought to justice. They shape the perception of children who are criminally exploited, as victim-survivors in need of support, or perpetrators subject to criminal justice intervention.

Until recently, modern slavery, human trafficking and exploitation legislation has primarily been employed to identify and support victim-survivors of CCE; recognising CCE as an emerging harm which fits the broad definition of exploitation in this legislation.

The year-on-year increase in referrals for CCE into the NRM reflects this. However, this perception is patchy, with professionals not routinely identifying CCE as a modern slavery, including human trafficking, offence, even though it could meet the definition of either, depending on the circumstances.

This is even more pronounced where recruitment and exploitation occur entirely online. In the absence of physical 'movement', children may be less likely recognised by the National Referral Mechanism (NRM) Single Competent Authority as potential victim-survivors of human trafficking. While movement has often been emphasised in trafficking decision-making in England and Wales and Northern Ireland, international human trafficking frameworks recognise that the recruitment or harbouring of children for the purpose of exploitation alone may constitute trafficking.

[13] ECPAT UK (2025) *More than words: how definitions impact on the UK's response to child trafficking and exploitation.* Available at: https://www.ecpat.org.uk/Handlers/Download.ashx?IDMF=286813c5-db33-422b-aea1-d7dc2489ddec

An overemphasis on movement within trafficking definitions has contributed to confusion among professionals, inconsistent identification of child trafficking, and the failure to recognise and protect children exploited through recruitment, harbouring, or online exploitation where movement is absent or unclear.[14]

The call by civil society organisations for a definition of CCE to be part of the Crime and Policing Act 2026 was motivated by this perceived ambiguity in the UK's modern slavery and human trafficking and exploitation legislation, thus aiming to make this form of exploitation clearer, and increase protections for children exploited in this way.

However, creating a new CCE definition and offence may lead to an unwelcome outcome, which is, to silo exploitation types further. Currently, Child Sexual Exploitation and Abuse (CSEA) is the predominant focus across the legal and policy landscape. Continuing to protect children from this type of harm is fundamentally important. Protecting children from all other harms is important too. Child Criminal Exploitation, labour exploitation, domestic servitude and new and emerging harms require equal focus, to ensure protections are in place to disrupt and safeguard children who are at risk. **Siloing exploitation types misses the intersecting nature of harms that are often experienced, with children exploited in multiple ways, simultaneously, online and offline.** The crime of criminal exploitation characteristically involves multiple harms, including, harassment and threats, coercion and control, sexual exploitation and abuse, financial exploitation, pressure to hold firearms, knives and weapons and involvement with drug supply.

Siloing by primary exploitation type means other harms can be misunderstood or go entirely unnoticed. Systems are then slow to respond to and implement effective support mechanisms to prevent it and protect children from it.

3.1.2 Poor visibility of online harms

Online regulation is now governed by the Online Safety Act 2023 and regulated by Ofcom. The Act represents a significant advance in protecting children online. However, the review findings suggest that online recruitment into CCE presents unique challenges that are not fully addressed through existing regulatory approaches. A priority offence for CSEA was created under the Act, but not for CCE. Behaviours linked to the online recruitment of children into criminal exploitation are split across other priority offences.

[14] ECPAT UK (2025) *More than Words*

In addition, grooming and recruitment behaviours are difficult to identify, particularly online. CCE is largely a relationship-based crime, the process happening gradually, over time. Conversations between perpetrators and children are likely to appear as 'normal online activity,' hiding exploitation from view.

Suggested safety measures implemented by the Act and linked Codes of Practice can be circumnavigated via end-to-end encrypted spaces, disappearing messages, moving children between platforms and using smaller or overseas platforms that may avoid enforcement, lack moderation staff and disappear and reappear under new names.

Although the Online Safety Act 2023 implements measures to improve reporting of illegal content, there is no single reporting mechanism. This increases risks to users if they do not know how or where to report such content. It also relies on children's understanding of exploitation and feeling safe enough to disclose what is happening to them. Reporting is disjointed, happening across thousands of platforms, negatively affecting pattern configuration of offender behaviours and the implementation of disruption mechanisms as a result. Loopholes are likely to develop faster than regulation and many offences committed online will rely on alternative laws for charging. Together these factors leave gaps that are not covered by the Online Safety Act 2023 and leave children at risk of online recruitment into criminal exploitation.

This means that professionals will face ongoing challenges in identifying online recruitment into criminal exploitation. Intelligence will remain dispersed over many platforms, increasing the complexity of investigations, making it more difficult to disrupt crime and identify perpetrators. For children, they are likely to remain vulnerable to emerging technologies, meaning exploitation is missed and opportunities to protect, reduced.

3.1.3 Variable implementation of child protection frameworks

Divergence across UK child protection systems has resulted in inconsistent responses to the online recruitment of children into criminal exploitation. Thresholds for recognising and responding to exploitation vary between local authorities, creating inequalities in the protection, safeguarding and support available to children. Governance arrangements are similarly uneven. While some local authorities have established clear reporting pathways and multi-agency exploitation panels to identify, assess and respond to children at risk, others have yet to implement equivalent structures, resulting in variable multi-agency responses to exploitation.

Knowledge and expertise of CCE and other forms of exploitation are unequal across the safeguarding workforce, negatively impacting safeguarding responses. Funding and resource constraints influence capacity and the ability of multi-agency partners to effectively collaborate and respond to children affected by online recruitment into criminal exploitation. In addition, an absence of clear guidance for identifying CCE, particularly online, hampers implementation of evidence-based measures to prevent harm and keep children safe.

For professionals working alongside children, these factors lead to reliance on individual knowledge and experience, reduced confidence and increased professional uncertainty, inconsistent decision-making, challenges with multi-agency collaboration and resource pressures limiting effective safeguarding. Children are negatively affected through delayed identification and intervention, unequal access to protection and support, missed preventative opportunities, increased risk of ongoing harm and potential criminalisation.

Children's safety and access to protection should not depend on where they live, the agency they first encounter, or the knowledge of individual professionals. However, differences in safeguarding systems risk creating inconsistent identification, protection and support for children recruited online into criminal exploitation.

3.1.4 Fragmented criminal offence framework

Enforcement powers remain disjointed, with different legislative and policy frameworks addressing discrete behaviours or stages along the continuum of child exploitation. No single legislative or regulatory framework currently provides a coherent response to the full cycle of online recruitment, grooming and exploitation. Consequently, professionals are often required to navigate multiple legal and policy mechanisms to identify children, safeguard victim-survivors, disrupt offending and secure prosecutions. This complexity places significant demands on professional knowledge, multi-agency coordination and criminal justice resources, creating opportunities for inconsistent practice and variable outcomes for children.

This review found that the UK's legislative, regulatory and policy landscape is fragmented. Although individual frameworks provide important safeguards, their lack of integration creates gaps, inconsistencies and opportunities for perpetrators to exploit weaknesses between systems. As long as these incoherent approaches persist, the ability to prevent online recruitment into

criminal exploitation, protect children effectively and deliver consistent criminal justice outcomes is likely to remain compromised.

3.2 Legislation, Policy and Guidance: The three domains

3.2.1 Domain 1: Regulating online spaces and data protection

Key Findings

1. The UK has significantly strengthened online safety regulation through the Online Safety Act 2023, placing greater responsibility on digital platforms to identify, assess and mitigate risks to children.

2. Existing digital regulation provides important safeguards against harmful online content and contact, but there is no explicit recognition of the online recruitment of children into criminal exploitation within digital regulation frameworks or the pathways through which children are groomed and exploited for criminal purposes.

3. Data protection frameworks increasingly recognise children's rights and vulnerabilities online, yet tensions remain between privacy protections and effective safeguarding information sharing.

4. Emerging technologies, including end-to-end encryption, AI-driven systems and private online spaces, continue to create challenges for preventing harm, protecting children online, investigating and prosecuting offenders.

5. The effectiveness of digital regulation will depend on implementation, regulatory oversight and the willingness of technology companies to comply with evolving requirements.

The Convention of the Rights of the Child, General Comment No. 25 (2021) addresses children's rights in the digital environment. It recognises that children can be recruited, coerced and manipulated through digital technologies and recruited into harmful activities via digital platforms.[15]

General Comment No. 25 explicitly recognises digital environments to be viewed as part of wider child protection systems. This includes regulation of digital service

[15] UNICEF (2021) *Convention on the Rights of the Child: General Comment No. 25 (2021) on children's rights in relation to the digital environment.* Available at: https://www.unicef.org/bulgaria/en/media/10596/file

environments – to include safety by design features, risk assessment, data protection and risk mitigation measures for recommender systems.[16]

In addition, it calls for a commitment to digital literacy awareness and early intervention and safeguarding, where online risks present.[17] Although not legally binding on the UK, General Comment No. 25 aligns closely with developments such as UK GDPR (2020), the Information Commissioner's Office Age-Appropriate Design Code (2020), and the Online Safety Act 2023.

The Digital Economy Act 2017 includes provisions to prevent digital and online harms; in particular, restricting access to online pornography and preventing or restricting the use of communication devices in connection with drug dealing offences.[18] Both can be linked with online recruitment into criminal exploitation. Similarly, the Digital Services Act 2022, a European law, creates provisions to minimise the risks of exposing citizens to illegal and harmful content, through increasing platform accountability, transparency, risk assessment and content governance.[19]

Both Acts paved the way for the Online Safety Act 2023, the UK's primary online regulation law. The Act recognises that illegal content exists on online services, with some illegal content relating to children, crime and exploitation. Under the Act, online platforms have a legal duty to protect children from harmful content and activity. Compliance with these duties is overseen by Ofcom, the UK's independent communications regulator, which operates separately from government in carrying out its regulatory and enforcement functions. Platforms that fail to meet their legal obligations may be investigated by Ofcom and face substantial financial penalties.[20]

The Online Safety Act 2023 identifies 'primary priority content,'[21] 'priority content'[22] and 'non-designated content,'[23] which is likely to be harmful to children. Service providers must implement the strongest protections to prevent children viewing primary priority content. While access to priority content requires a more

[16] Recommender systems are algorithms used by digital platforms to predict and suggest content, products, people, or services that a user is likely to engage with.
[17] UNICEF (2021) *Convention on the Rights of the Child*
[18] United Kingdom Parliament (2017) *Digital Economy Act 2017.* Available at: https://www.legislation.gov.uk/ukpga/2017/30
[19] European Union (2022) *Regulation (EU) 2022/2065 of the European Parliament and the Council of 19 October 2022 on a Single Market for Digital Services (Digital Services Act).* Available at: https://eur-lex.europa.eu/eli/reg/2022/2065/oj
[20] United Kingdom Parliament (2023) *Online Safety Act 2023.* Available at: https://www.legislation.gov.uk/ukpga/2023/50/contents
[21] 'Primary priority content' includes pornographic content and content which encourages, promotes, or provides instructions for suicide, self-harm and eating disorders.
[22] 'Priority content' includes content, which is abusive and incites hatred, abuse and hate content, bullying content, violent content, harmful substances content and dangerous stunts and challenges content.
[23] 'Non-designated content' includes types of content that do not fall within primary priority content or priority content categories, such as depression content and body stigma content, and which present a 'material risk of significant harm to an appreciable number of children in the United Kingdom.'

proportionate approach, reducing the likelihood of children encountering it - such as through content moderation, recommendations controls, restricting algorithms, or age-appropriate defaults. The Act sets out duties for service providers within scope of the Act (where children are likely to use a service) to protect children from harmful content, including how they encounter it.[24]

Supplementing the Act are two Children Codes of Practice, one focusing on user-to-user services[25] and the other on search services.[26] The Act and Codes include measures that service providers must take to comply, which include undertaking children's risk assessments[27] and illegal content risk assessments.[28]

In undertaking children's risk assessments, Ofcom expect services to refer to the Children's Register of Risks which groups different kinds of content harmful to children, based on content type. Although CCE is not mentioned specifically, in relation to this type of exploitation, harmful content might include 'primary priority content' such as pornography, and 'priority content' focused on abuse and hate, bullying, violence, harmful substances, and dangerous stunts and challenges.

In addition, it could also encompass 'non-designated content' focused on depression, hopelessness and despair.[29] All are interconnected with this form of child exploitation.

The Act is clear in its' expectations of service providers, who must implement protections for children on services, such as age assurance, content moderation, algorithm controls and user reporting tools. In addition, comply with governance, ongoing monitoring and review, or confer duties for these activities.[30]

---

[24] Ofcom (2026) *Protection of children duties under the Online Safety Act.* Available at: https://www.ofcom.org.uk/online-safety/protecting-children/protection-of-children-duties-under-the-online-safety-act

[25] Ofcom (2026) *Protection of children code of practice for user-to-user services (Online Safety Act).* Available at: https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/statement-protecting-children-from-harms-online/main-document/protection-of-children-code-of-practice-for-user-to-user-services-.pdf?v=399756

[26] Ofcom (2025) *Protection of children code of practice for search services (online Safety Act).* Available at: https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/statement-protecting-children-from-harms-online/main-document/protection-of-children-code-of-practice-for-search-services.pdf?v=399755

[27] Ofcom (2025) *Children's Risk Assessment Guidance and Children's Risk Profiles.* Available at: https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/statement-protecting-children-from-harms-online/main-document/childrens-risk-assessment-guidance-and-childrens-risk-profiles.pdf?v=396653

[28] Ofcom (2024) *Protecting people from illegal harms online: Risk Assessment Guidance and Risk Profiles.* Available at: https://www.ofcom.org.uk/siteassets/resources/documents/online-safety/information-for-industry/illegal-harms/risk-assessment-guidance-and-risk-profiles.pdf?v=390984

[29] Ofcom (2025) *Children's Register of Risks.* Available at: https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/statement-protecting-children-from-harms-online/main-document/childrens-register-of-risks.pdf?v=401302

[30] Ofcom (2026) *Protection of children duties under the online Safety Act.*

The Act lists over 130 'priority offences', which Ofcom has grouped into seventeen kinds of 'priority illegal content.'[31] Child Criminal Exploitation is not one of these, however, several offence categories overlap significantly with this type of exploitation, as Table 2 outlines.

Table 2: Online Safety Act 2023: priority illegal content relevant to Child Criminal Exploitation[32]

Offence category	Relevance to Child Criminal Exploitation
Harassment, stalking, threats and abuse offences	CCE often depends on intimidation, threats, humiliation and emotional dependency.
Coercive and controlling behaviour	CCE often depends on intimidation, threats, humiliation, emotional dependency and coercive control. This could happen through constant surveillance, location tracking, digital monitoring, public shaming and threats made via disappearing messages and end-to-end encryption systems.
Intimate image abuse	There is often a cross over between CSEA and CCE. Intimate images can be used as part of the grooming process and a way of coercing and controlling children into carrying out criminal activities, including criminally motivated sexual extortion. The focus on CSEA within the Act and associated protection measures enable rapid removal/detection of severe abuse content and could disrupt perpetrators who may recruit children into CCE.
Child Sexual Exploitation and Abuse (CSEA)	Children recruited for CCE might be forced to conceal drugs or objects internally within their body, as a method of transportation to avoid detection. This invasion of a child's body could meet the definition of sexual assault/sexual violence and demonstrates a way in which CCE and CSEA interlink.
Human trafficking	CCE is closely connected to the offence of human trafficking. Although implied, rather than explicitly cited as an exploitation type within human trafficking and modern

[31] Ofcom (2024) *Protecting people from illegal harms online.*
[32] Ofcom (2023) *Overview of illegal harms (Online Safety Act).* Available at: https://www.ofcom.org.uk/siteassets/resources/documents/online-safety/information-for-industry/illegal-harms/overview-of-illegal-harms.pdf?v=390985

	slavery legislation, in most situations, human trafficking or modern slavery will have been committed, as children are recruited, harboured, moved and exploited (human trafficking), and/or kept in houses or locations where they are monitored and exploited (which could be slavery, servitude, forced or compulsory labour). Young people may also experience their homes being taken over by criminals and used as a base to undertake illegal activities. Known as 'cuckooing', this is a prevalent practice linked to CCE.
Fraud and financial offences	CCE may involve children being forced to undertake fraud and financial offences, which include, setting up fake accounts, handling stolen money, laundering money, crypto-currency related crime and moving money.
Proceeds of crime	
Drugs and psychoactive substances	CCE can involve offenders grooming and coercing children through the offer of drugs, then controlling them through this, including the creation of debt and addiction issues for some children. Also forcing children to move drugs to different locations.
Firearms, knives and other weapons	Children who are criminally exploited may be exposed to weapons, forced to carry or hold weapons, carry weapons to protect themselves and/or experience intimidation through the use of weapons.

Online regulation and data protection are closely linked as many online activities involve the collection, storage, sharing, and use of personal data, all of which can increase online risks for children.

In the UK, data protection law is directly influenced by the General Data Protection Regulation (GDPR) (EU) 2016/679.[33] The UK GDPR[34] forms part of the UK's data protection regime, alongside the Data Protection Act 2018.[35] This legislation places obligations on data controllers and processors focusing on accountability, data security, breach reporting and data protection risk assessment. This legislation restricts international data transfers and grants individuals' rights over their data.

[33] European Union (2016) *Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation).* Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679
[34] United Kingdom Parliament (2016) *Regulation (EU) 2016/679 of the European Parliament and of the Council.* Available at: https://www.legislation.gov.uk/eur/2016/679/contents
[35] United Kingdom Parliament (2018) *Data Protection Act 2018.* Available at: https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted

The Information Commissioner's Office (ICO) regulates GDPR compliance in the UK. The ICO supervises and supports organisations to comply with their data protection duties and can take regulatory action for infringements of UK GDPR.[36]

The ICOs Age-Appropriate Design Code came into effect in 2020. This statutory code of practice outlines fifteen core standards that must be applied to online services in scope of the code, aimed at protecting children within the digital world, rather than protecting them from it.[37] The code aims to minimise data collection and use by default, and help children better understand default settings and how their data is used.[38]

The Data Use and Access Act 2025 aims to streamline data protection laws to make compliance easier while maintaining robust privacy standards, updating parts of UK GDPR and the Data Protection Act 2018.[39]

In relation to the online recruitment of children into criminal exploitation, digital regulation through law and guidance, and data protection law, offer strong protections for children. If implemented robustly, these protections could lessen opportunities for exploitation, by making platforms safer by design and limiting perpetrator access to children and their data. However, the online recruitment of children into criminal exploitation remains only partially visible within these frameworks, challenging prevention, detection and enforcement efforts. The effectiveness of the regulatory framework will depend on strong integration with safeguarding and criminal justice responses to online criminal exploitation.

[36] Department for Science, Innovation and Technology and Department for Digital, Culture, Media and Sport (2021) *Child online safety, data protection and privacy: why this is important*. Available at: https://www.gov.uk/guidance/child-online-safety-data-protection-and-privacy - why-this-is-important

[37] **The 15 core standards:** 1) Best interests of the child, 2) Data protection impact assessments, 3) Age appropriate application, 4) Transparency, 5) Detrimental use of data, 6) Policies and community standards, 7) Default settings, 8) Data minimisation, 9) Data sharing, 10) Geolocation, 11) Parental controls, 12) Profiling, 13) Nudge techniques, 14) Connected toys and devices, 15) Online tools.

[38] Information Commissioners Office (2022) *Age-appropriate design: a code of practice for online services.* Available at: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/age-appropriate-design-a-code-of-practice-for-online-services/

[39] United Kingdom Parliament (2025) *Data (Use and Access) Act 2025.* Available at: https://www.legislation.gov.uk/ukpga/2025/18/contents

Table 3: Regulating online spaces and data protection – strengths and gaps in the related legislation, policy and guidance

Legislation, policy, guidance	Strengths	Gaps
The Convention on the Rights of the Child, General comment No. 25	• Explicit about the digital environment being part of the child protection system • Focus on CSEA • Cites recruitment into harmful activities via digital platforms • Focus on platform responsibility • Child-rights focused • Preventative approach	• No explicit recognition of CCE • Not legally binding • Relies on States' implementation which varies
Digital Economy Act 2017	• Powers within the Act can promote multi-agency safeguarding and disruption • Includes restricting communication devices in connection with drug dealing offences which could be relevant to CCE • Includes restricting access to online pornography which could be relevant to CCE	• No explicit recognition of CCE • Safeguarding is not central • Online exploitation has evolved faster than the legislation – for example, end-to-end encryption, disappearing content, gaming ecosystems, algorithmic recommendation systems
Digital Services Act 2022	• Focus on platform responsibility – risk assessment, algorithm accountability, reporting mechanisms, penalties for non-compliance • Child safety obligations	• No explicit recognition of CCE • Online exploitation has evolved faster than the legislation – for example, end-to-end encryption, disappearing content, gaming ecosystems, algorithmic recommendation systems

	• Includes measures to reduce misuse of platforms for criminal activity	
Online Safety Act 2023	• Focus on platform responsibility – risk assessment, illegal content, age assurance, priority offences, algorithm accountability, reporting mechanisms, penalties for non-compliance • Focus on CSEA and other priority offences that relate to CCE • Encourages safety-by-design • Includes measures to reduce misuse of platforms for criminal activity • Supports disruption of exploitation ecosystems • Provides for online regulation through Ofcom and supervision of services to help service providers make improvements	• No explicit recognition of CCE, with potential CCE related offences fragmented across the Illegal Harms and the Children's Register of Risks • Unlikely to change individual offending behaviour • Encrypted messaging means reduced transparency, negatively impacting safeguarding potential • Age assurance mechanisms can be circumnavigated • Loopholes are likely to develop faster than regulation • Smaller or overseas platforms may avoid enforcement, lack moderation staff, disappear and reappear under new names • Many offences will still rely on alternative laws for charging
The UK GDPR	• Protects sensitive personal data • Helps reduce exploitable data about children • Enables lawful investigative use of data	• Limited direct impact on offenders as GDPR mainly focuses on companies and public bodies • Encrypted messaging means reduced transparency, negatively impacting safeguarding potential

		• Criminal networks often operate across borders making it difficult to identify, investigate and enforce across jurisdictions
Data Protection Act 2018	• Framework for lawful data use by safeguarding bodies • Strong protections for children's data • Supports data sharing where necessary, proportionate and justified • Offers protection from harmful data practices • Enables lawful investigative use of data • Enforcement of the Information Commissioner's Office	• Indirect impact on CCE, mediated through safeguarding bodies, police data systems and platform compliance which are all variable • Unlikely to change individual offending behaviour • Limited relevance to modern digital forms of exploitation • Tension between privacy and safeguarding
Data Use and Access Act 2025	• Increased data sharing mechanisms where safeguarding concerns exist • Strong protections for children's data • Strong complaint and transparency requirements • Enables lawful investigative use of data	• Indirect impact on CCE, mediated through safeguarding bodies, police data systems and platform compliance which are all variable • Unlikely to change individual offending behaviour • Limited relevance to modern digital forms of exploitation • Tension between privacy and safeguarding

3.2.2 Domain 2: Safeguarding and protecting children

KEY FINDINGS:

1. Historical safeguarding legislation was not designed with online recruitment into criminal exploitation in mind and relies on contemporary interpretation to address emerging harms.

2. Newer safeguarding frameworks across the UK increasingly recognise exploitation, extra-familial harm and technology-facilitated abuse as significant risks to children.

3. Recent policy and legislative reforms have strengthened contextual safeguarding approaches and improved mechanisms for information sharing and early intervention.

4. Inconsistent implementation, resource pressures and fragmented data systems continue to affect the identification and protection of children at risk online.

5. Children recruited online into criminal exploitation may experience different levels of protection depending on where they live and how their experiences are understood by professionals.

Keeping children safe online is not only the responsibility of digital platform providers or through the implementation of data protection regulations. Public authorities such as local authorities, police, education and health services are responsible for ensuring the safety and wellbeing of children, in both online and offline worlds. As online harms often merge into offline spaces, it is imperative that public authorities work together to understand emerging risks and fulfil their statutory duties to safeguard and protect children.

The UN Convention on the Rights of the Child is a set of legally binding civil, political, economic and cultural rights of every child aged from 0-17 years, regardless of their race, religion or abilities.[40]

The Convention plays a meaningful role in preventing harm and exploitation, including CCE, through States' implementation of effective education and awareness programmes, safeguarding systems, early intervention programmes and support for at risk children and families.

[40] United Nations (1989) *Convention on the Rights of the Child.* Available at: https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf

With relevance to the online recruitment of children into criminal exploitation, the Convention aims to protect children's life, survival and development (Article 6), offer protection from violence, abuse and neglect (Article 19) and protect them from different forms of harm, including child labour (Article 32), sexual exploitation (Article 34), abduction, sale and trafficking (Article 35) and all other forms of exploitation (Article 36). Importantly, the Convention pays respect to the views of children (Article 12), promotes children gaining knowledge of their rights (Article 42) and access to the support they need to recover from trauma and reintegrate into their community (Article 39).[41]

The UNCRC was ratified by the UK in December 1991 and guides domestic law and practice, in particular the best interests of the child (Article 3) and the right to participation (Article 12).[42] In addition, it is incorporated into Welsh law through the Rights of Children and Young Person's (Wales) Measure 2011, making Wales the first country in the UK to do this.[43] Although the UNCRC has influenced UK law and practice, human rights legislation has predominantly been guided by the European Convention on Human Rights 1950,[44] through adoption of the Human Rights Act 1998.[45] Both legal instruments place duties on States to prevent foreseeable harm and human rights violations, protect victim-survivors and vulnerable people, and prosecute and investigate serious offences. With relevance to the online recruitment of children into criminal exploitation, the Act is explicit about citizens' right to life (Article 2), right to freedom from torture, inhuman and degrading treatment (Article 3) and the right to freedom from slavery and forced labour (Article 4).

Across the UK, these rights have shaped the modern child protection system. Although early child protection legislation predates modern forms of harm and was established to predominantly focus on harm within the home, the Children Act 1989 (England and Wales),[46] Children (Scotland) Act 1995,[47] and Children (Northern Ireland) Order 1995[48] continue to play a pivotal role in keeping children safe. They do so namely through duties to intervene where children are in need, to investigate where there is a risk of significant harm and to issue orders when there

[41] ibid
[42] ibid
[43] Welsh Senedd (2011) *Rights of Children and Young Persons (Wales) Measure 2011.* Available at: https://www.legislation.gov.uk/mwa/2011/2/pdfs/mwa_20110002_en.pdf
[44] Council of Europe (1950) *Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights).* Available at: https://www.echr.coe.int/documents/d/echr/convention_eng
[45] United Kingdom Parliament (1998) *Human Rights Act 1998.* Available at: https://www.legislation.gov.uk/ukpga/1998/42/contents
[46] United Kingdom Parliament (1989) *Children Act 1989.* Available at: https://www.legislation.gov.uk/ukpga/1989/41/contents
[47] Scottish Parliament (1995) *Children (Scotland) Act 1995.* Available at: https://www.legislation.gov.uk/ukpga/1995/36/contents
[48] Northern Ireland Assembly (1995) *The Children (Northern Ireland) Order 1995.* Available at: https://www.legislation.gov.uk/nisi/1995/755/contents/made

are no safer options. Multi-agency working is central within these laws, alongside the welfare of the child as a paramountcy principle.

Over time, the legislative framework aimed at protecting children has developed, adapting to changes in society, and the emerging needs of citizens.

The Children Act 2004 (England and Wales) established Local Safeguarding Children's Boards (LSCBs) and Multi-Agency Safeguarding Hubs (MASH), placing a duty on public authorities to safeguard and promote the welfare of children, strengthening the focus on early intervention and multi-agency working.[49]

From 2014-2020, all four UK nations developed new child protection legislation. This included the Social Services and Well-being (Wales) Act 2014,[50] Children and Young People (Scotland) Act 2014,[51] Children's Services Co-operation Act (Northern Ireland) 2015,[52] Children and Social Work Act 2017 (England, with some provisions extended to Wales),[53] Getting it right for every child (Scotland),[54] and the Children Scotland Act 2020.[55]

These legislative measures promote a more strategic approach to child protection, predominantly centring on early identification, stronger multi-agency safeguarding mechanisms and information sharing. In particular, Wales, Scotland and Northern Ireland, began to prioritise wellbeing and outcomes for children. Across all four UK nations, the law became increasingly child-focused, with greater attention on children's rights and participation. During this time, the concept of trauma-informed practice[56] developed, as did early consideration of harm *beyond* the home.

Contextual safeguarding[57] began to emerge as a new approach to protecting children at risk of extra-familial harm. In 2018, the National County Lines Coordination Centre was established, in response to the threat of County Lines, a type of exploitation associated with CCE. Funded by the Home Office, the Centre

[49] United Kingdom Parliament (2004) *Children Act 2004.* Available at: https://www.legislation.gov.uk/ukpga/2004/31/contents
[50] Welsh Senedd (2014) *Social Services and Well-being (Wales) Act 2014.* Available at: https://www.legislation.gov.uk/anaw/2014/4/contents
[51] Scottish Parliament (2014) *Children and Young People (Scotland) Act 2014.* Available at: https://www.legislation.gov.uk/asp/2014/8/contents
[52] Northern Ireland Assembly (2015) *Children's Services Co-operation Act (Northern Ireland) 2015.* Available at: https://www.legislation.gov.uk/nia/2015/10/contents
[53] United Kingdom Parliament (2017) *Children and Social Work Act 2017.* Available at: https://www.legislation.gov.uk/ukpga/2017/16/contents/enacted
[54] Scottish Government (2006) *Getting it right for every child (GIRFEC).* Available at: https://www.gov.scot/policies/girfec/
[55] Scottish Parliament (2020) *Children Scotland Act 2020.* Available at: https://www.legislation.gov.uk/asp/2020/16/contents
[56] Trauma-informed practice is an approach to health and care interventions which is grounded in the understanding that trauma exposure can impact an individual's neurological, biological, psychological and social development). There are six key principles of trauma-informed practice: safety, trust, choice, collaboration, empowering and cultural consideration (Working definition of trauma-informed practice - 2022).
[57] Contextual Safeguarding is an approach to understanding and responding to young people's experiences of significant harm beyond their families, among peers, in their neighbourhoods, schools and online. Contextual Safeguarding expands the objectives of child protection systems in recognition of the fact that young people are vulnerable to abuse beyond their front doors. Durham University - here.

aims to coordinate national law enforcement activity across England, Scotland and Wales.[58]

From 2020 onwards, general understanding of CCE increased, with exploitation, other than County Lines, being recognised.[59] The Home Office began reporting on numbers of children referred into the NRM for CCE related exploitation. Child protection legislation, policy and guidance shifted in focus, with online forms of exploitation appearing in statutory guidance and laws.

Across the UK, statutory guidance exists to help safeguarding partners work effectively together to protect children. Most recently, this guidance includes, Working Together to Safeguard People 2022 (Wales),[60] including the All Wales Practice Guides 2021 – Safeguarding children from online abuse,[61] The National Guidance for Child Protection in Scotland (2023),[62] Co-operating to Safeguard Children and Young People in Northern Ireland (2024),[63] and Working Together to Safeguard Children 2026 (England).[64]

From 2022 onwards, these guidance documents start to address abuse and exploitation *that happens online*, citing online grooming, Child Sexual Exploitation and Abuse, Child Criminal Exploitation, coercion, cyberbullying and exposure to harmful content as potential forms of online harm. Within the guidance, professionals are directed to consider online and offline dangers when assessing and safeguarding children and share information with statutory partners to reduce risks. None, however, offer a framework for assessing online risks, which remain the responsibility of local authorities and other statutory partners to develop and implement.

[58] National Police Chiefs' Council (NPCC) (n.d.) *National Country Lines Coordination Centre*. Available at: https://www.npcc.police.uk/our-work/work-of-npcc-committees/Crime-Operations-coordination-committee/national-county-lines-co-ordination-centre/

[59] 'County lines' is a violent and exploitative form of drug distribution. A common feature of county lines is the exploitation of children, young people and vulnerable adults who are instructed to deliver and / or store drugs, and associated money or weapons, to dealers or drug users, locally or in other counties.

[60] Welsh Government (2018) *Working Together to Safeguard People: Volume 5 - Handing Individual Cases to Protect Children at Risk.* Available at: https://www.gov.wales/sites/default/files/publications/2019-05/working-together-to-safeguard-people-volume-5-handling-individual-cases-to-protect-children-at-risk.pdf

[61] Welsh Government (2021) *Section 6: All Wales Practice Guides. Safeguarding children from online abuse.* Available at: https://www.safeguarding.wales/en/chi-i/chi-i-c6/c6-p6/

[62] Scottish Government (2023) *National Guidance for Child Protection in Scotland 2021 - updated 2023.* Available at: https://www.gov.scot/publications/national-guidance-child-protection-scotland-2021-updated-2023/pages/8/

[63] Department of Health, Social Services and Public Safety (2024) *Co-operating to Safeguard Children and Young People in Northern Ireland.* Available at: https://www.health-ni.gov.uk/sites/default/files/publications/health/Co-operating-to-Safeguard-Children-and-Young-People.pdf

[64] Department for Education (2026) *Working Together to Safeguard Children 2026: A guide to multi-agency working to help, protect and promote the welfare of children.* Available at: https://assets.publishing.service.gov.uk/media/69fb1c28d0e316a40f269a5b/Working_together_to_safeguard_children_2026_a_guide_to_multi_agency_working.pdf

In England, statutory guidance, Keeping children safe in education (2025)[65] references online safety throughout, with schools and colleges responsible for implementing online safety training for teachers, ensuring that all staff are aware of indicators of abuse, neglect and exploitation of children, including that which occurs online. The guidance states that schools and colleges should include online safety in their child protection policy and children taught about online risks and safety. The guidance provides links to a range of resources to help schools and colleges develop a whole system approach towards keeping children safe online.[66] This guidance has recently been updated and includes greater focus on online safety. The guidance came to effect from the 1 September 2026.[67]

The Children's Wellbeing and Schools Act 2026 is England's (with some provisions extending to Wales) most recent law focusing on child safeguarding and welfare.[68] It aims to enable stronger multi-agency partnerships, improve information sharing, provide for children not in school and offer better support for children in care and care leavers. Part 3 of the Act relates to online safety and the power to prevent or restrict access by children to internet services, provisions relating to children's personal data and age verification. Although not yet fully in force, the Act aims to improve safeguarding accountability and develop mechanisms so that no child is hidden from the safeguarding system.

The powers introduced under the Children's Wellbeing and Schools Act 2026 to restrict or prevent children's access to certain internet services has been exercised. On the 15 June 2026, then Prime Minister Keir Starmer announced a UK-wide social media ban for children under the age of sixteen years and strong requirements for age-verification on platforms. Additional measures will restrict access to potentially harmful features, such as livestreaming and direct messaging from strangers, for children under eighteen. These measures do not constitute a complete ban on internet access for children; rather, they apply to specific platforms and online features. Ofcom has been tasked with developing effective age-assurance mechanisms to verify whether users are over the age of

[65] Department for Education (2025) *Keeping children safe in education 2025: Statutory guidance for schools and colleges.* Available at: https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf

[66] ibid

[67] Department for Education (2026) *Keeping children safe in education 2025: Statutory guidance for schools and colleges.* Available at: https://assets.publishing.service.gov.uk/media/6a4cf903b7203c4c023fd2f3/Keeping_children_safe_in_education_2026_.pdf

[68] United Kingdom Parliament (2026) *Children's Wellbeing and Schools Act 2026.* Available at: https://www.legislation.gov.uk/ukpga/2026/21/contents

sixteen. Regulations will be drafted before the measures come into force in Spring 2027.[69]

The child protection framework across the UK provides a substantial foundation for protecting children from harm and has evolved to better recognise exploitation, contextual safeguarding and technology-facilitated abuse. Recent reforms have strengthened multi-agency working, information sharing, and the identification of children who are potentially at risk of harm. Nevertheless, significant challenges remain. Much of the legislative framework predates contemporary forms of online recruitment and exploitation, while variation in implementation, professional practice, resources and data systems continues to affect outcomes for children. Consequently, children recruited online into criminal exploitation may not be identified, protected or supported consistently, highlighting the need for a more coherent and coordinated safeguarding response.



[69] Department for Science, Innovation and Technology (2026) *Fact sheet: New rules to protect children online.* Available at: https://www.gov.uk/government/publications/fact-sheet-new-rules-to-protect-children-online/fact-sheet-new-rules-to-protect-children-online

Table 4: Safeguarding and protecting children – strengths and gaps in the related legislation, policy and guidance

Type	Legislation, policy, guidance	Strengths	Gaps
Child protection legislation, guidance and frameworks relevant to safeguarding children, without specific mention of online recruitment of children for the purposes of exploitation, including CCE	Children Act 1989	• Central child protection framework in England (and some provisions extend to Wales) • The welfare of the child is paramount • Enables early intervention under s.17 Child in Need provisions • Enables investigations under s.47 where there is a risk of significant harm • Supports multi-agency safeguarding • Child-first focused	• Focus on parental harm rather than extra-familial harm • Pre-dates modern forms of exploitation • Variable implementation of safeguarding thresholds across local authorities, funding and resources • Reliance on interpretation, professional judgement and local practices, funding and resources
	Children Act 2004	• Adoption of Multi-Agency Safeguarding Hubs and Local Safeguarding Children's Boards, requiring multi-agency cooperation • Imposes safeguarding duties on all key services • Embeds system-wide children protection responsibility	• Focus on parental harm rather than extra-familial harm • Pre-dates modern forms of exploitation • Variable implementation of safeguarding thresholds across local authorities • Reliance on interpretation, professional judgement and local practices, funding and resources

		• Enables coordinated early intervention and risk identification • Child-first focused	
	Children and Social Work Act 2017	• Focus on multi-agency safeguarding • Implements measures to better protect children looked after, care leavers and children at risk of harm • Promotes early intervention • Implements measures to learn from serious incidents • Child-first focused	• Focus on parental harm rather than extra-familial harm • Pre-dates modern forms of exploitation • Variable implementation of safeguarding thresholds across local authorities • Reliance on interpretation, professional judgement and local practices, funding and resources
	Social Services and Well-being (Wales) Act 2014	• Focus on prevention and early intervention • Focus on multi-agency safeguarding • Provides a holistic understanding of wellbeing • Child-first focused	• Focus on parental harm rather than extra-familial harm • Pre-dates modern forms of exploitation • Variable implementation of safeguarding thresholds across local authorities • Reliance on interpretation, professional judgement and local practices, funding and resources
	Children (Scotland) Act 1995	• Central child protection framework in Scotland	• Focus on parental harm rather than extra-familial harm

		• The welfare of the child is paramount • Enables early intervention under s. 22 Child in Need provisions • Supports multi-agency safeguarding and child protection enquiries under s. 22, s. 55 (Child Assessment Orders), and s. 57 (Child Protection Orders) • Child-first focused	• Pre-dates modern forms of exploitation • Variable implementation of safeguarding thresholds across local authorities • Reliance on interpretation, professional judgement and local practices, funding and resources
	Children and Young People (Scotland) Act 2014	• Places Getting if for Every Child in Scotland (GIRFEC) on a statutory footing • Focus on prevention and early intervention • Focus on multi-agency safeguarding • Provides a holistic understanding of wellbeing • Focus on children's rights and participation • Offers better support for care-experienced young people • Child-first focused	• Focus on parental harm rather than extra-familial harm • Pre-dates modern forms of exploitation • Variable implementation of safeguarding thresholds across local authorities • Reliance on interpretation, professional judgement and local practices, funding and resources

	Children (Scotland) Act 2020	• Integrates Getting it right for every child (GIRFEC) • Provides a trauma-informed and welfare-based approach • Focus on children's rights and participation • Child-first focused	• Focus on parental harm rather than extra-familial harm • Pre-dates modern forms of exploitation • Variable implementation of safeguarding thresholds across local authorities • Reliance on interpretation, professional judgement and local practices, funding and resources
	Children's services planning: guidance (Scotland) 2020	• Focus on prevention • Focus on multi-agency safeguarding and system-wide planning • Focus on outcomes and wellbeing	• Not legally binding • Reliance on interpretation, professional judgement and local practices, funding and resources
	Children (Northern Ireland) Order 1995	• Central child protection framework in Northern Ireland • The welfare of the child is paramount • Enables early intervention under Article 18 Child in Need provisions	• Focus on parental harm rather than extra-familial harm • Pre-dates modern forms of exploitation • Variable implementation of safeguarding thresholds across local authorities

		• Supports multi-agency safeguarding and child protection enquiries under s. 66 • Child-first focused	• Reliance on interpretation, professional judgement and local practices, funding and resources
	Children's Services Co-operation Act (Northern Ireland) 2015	• Provides a strategic approach to safeguarding • Focus on multi-agency safeguarding • Focus on prevention • Focus on outcomes and wellbeing • Child-first focused	• Focus on parental harm rather than extra-familial harm • Pre-dates modern forms of exploitation • Variable implementation of safeguarding thresholds across local authorities • Reliance on interpretation, professional judgement and local practices, funding and resources
	Children and Young People's Strategy 2020-2030 (Northern Ireland)	• Promotes a whole-system approach to protecting children • Focus on children's rights and participation • Integrated policy framework • Long-term plan – 10 years	• Not law • Reliance on implementation at a high level • Dependence on political and funding stability • Variable implementation • Limited frontline safeguarding function
Child protection guidance and frameworks recognising online	Keeping children safe in education 2025 (England)	• Whole school safeguarding approach • Promotes early identification in education settings, recognises risks such as misinformation,	• Guidance not law

recruitment of children for the purposes of exploitation, including CCE		disinformation, conspiracy theories, online grooming and coercive influence • Promotes multi-agency referrals where children may be at risk of suffering significant harm • Encourages information sharing • Focus on attendance and alternative provision • Strong recognition of online harm, peer abuse and group harm • Child-centre and trauma-informed	• Reliance on interpretation, professional judgement and local practices, funding and resources • Limited specialist resources in education settings • Fragmented data capture • Inconsistent transition approach from child to adult services
	Working Together to Safeguard Children 2026（England）	• Stronger contextual safeguarding approach • Focus on improving multi-agency accountability • Greater focus on exploitation and online harm • Better inclusion of vulnerable groups • Emphasis on anti-racist and anti-discriminatory practice	• Guidance not law • Reliance on interpretation, professional judgement and local practices, funding and resources • Fragmented data capture • Inconsistent transition approach from child to adult services

	Children's Wellbeing and Schools Act 2026 (England)	• Introduces unique child identifiers – no child to be hidden from the safeguarding system • Promotes early identification • Emphasises information sharing • Introduces multi-agency child protection teams • Extends family group decision-making • Promotes school-based protective measures • Includes mechanisms to better support children in care and care leavers • Increases regulation of care settings and agencies • Child-first focused	• Ongoing issues in care placements – shortages, quality, unregulated accommodation • Reliance on interpretation, professional judgement and local practices, funding and resources • Fragmented data capture • Inconsistent transition approach from child to adult services
	Children's Social Care National	• Focus on contextual safeguarding • Emphasises early help	• Guidance, not law

	Framework 2026 (England)	• Focus on the protection of vulnerable groups • Trauma-informed approach • Focus on anti-discriminatory and fair practice • Child-first focused	• Reliance on interpretation, professional judgement and local practices, funding and resources • Fragmented data capture • Inconsistent transition approach from child to adult services
	Working Together to Safeguard People: Code of Safeguarding Practice 2022 (Wales)	• Promotes multi-agency working and information sharing • Introduces Regional Safeguarding Boards • Focus on contextual safeguarding • Child-first focused	• Guidance, not law • Reliance on interpretation, professional judgement and local practices, funding and resources • Fragmented data capture • Inconsistent transition approach from child to adult services
	The National Guidance for Child Protection in Scotland 2023	• Promotes multi-agency working and information sharing • Focus on early identification • Focus on contextual safeguarding • Focus on learning and continual improvement	• Guidance, not law • Reliance on interpretation, professional judgement and local practices, funding and resources

		• Rights-based and child centred	
	Cooperating to safeguard children and young people in Northern Ireland 2024	• Recognises modern safeguarding risks, including online harms • Promotes a multi-agency safeguarding system • Promotes early intervention • Promotes information sharing • Child centred	• Guidance, not law • Reliance on interpretation, professional judgement and local practices, funding and resources
	Northern Ireland's Child Criminal Exploitation Action Plan 2024	• Recognises CCE as child abuse • Promotes multi-agency safeguarding • Explicit inclusion of organised crime and paramilitary exploitation • Practical operations focus • Linked to modern slavery frameworks	• Guidance, not law • Reliance on interpretation, professional judgement and local practices, funding and resources • Data limitations as Northern Ireland has low identification of CCE

3.2.3 Domain 3: Preventing crime and prosecuting offenders

KEY FINDINGS:

1. The UK has a substantial body of criminal law capable of addressing many of the perpetrator behaviours associated with the online recruitment of children into criminal exploitation.

2. Historically, responses have relied on a combination of modern slavery, human trafficking and exploitation, communications, sexual offences, weapons and firearm and serious crime legislation rather than a specific CCE offence.

3. The Crime and Policing Act 2026 represents a significant shift by creating dedicated offences and disruption measures relating to CCE. Although this could increase understanding and identification of children at risk, there is potential for this to further silo exploitation types and miss multiple harms children can experience when recruited into criminal or other forms of exploitation.

4. Criminal justice responses remain largely reactive and can struggle to address early indicators of grooming, coercion and control before exploitation becomes visible.

5. Children continue to face the risk of criminalisation when exploitation is not recognised or when safeguarding and criminal justice responses are poorly coordinated.

Keeping children safe online is not only the responsibility of digital platform providers and public authorities. It is also the concern of the criminal justice system, which plays a key role in investigating, prosecuting, and bringing perpetrators of criminal exploitation to justice, alongside protecting the rights of victim-survivors, defendants and witnesses.

The Crime and Policing Act received Royal Assent on the 29 April 2026 and came into force on the 29 June 2026. Part 4 of the Act outlines the offences of Child Criminal Exploitation, cuckooing and internal concealment. The Act provides for special measures for witnesses where children have been exploited, and the

issuing of Child Criminal Exploitation Prevention Orders to prohibit a defendant engaging in CCE, aiming to disrupt any further harm.[70]

Until this point, there has been no single offence of Child Criminal Exploitation in the UK. As offending related to CCE often involves a range of perpetrator behaviours, the crime of CCE has been pieced together across different statutes. Although the advent of the Crime and Policing Act 2026 provides for a CCE offence, other offences will remain relevant in prosecuting perpetrators for recruiting children online into criminal exploitation.

3.2.3a Modern Slavery, Human Trafficking and Exploitation

In 2015, all four UK nations enacted modern slavery (England and Wales) or human trafficking and exploitation legislation (Scotland and Northern Ireland).[71] Influenced by the Palermo Protocol,[72] the Council of Europe Convention on Action Against the Trafficking in Human Beings[73] and subsequent EU Directive 2011/36/EU on Preventing and Combating Trafficking in Human Beings and Protecting Victims,[74] legislation across the UK aims to prevent human trafficking and other modern slavery offences, protect victim-survivors and prosecute offenders. In addition, it seeks to monitor referrals and provide support via the National Referral Mechanism.

Although criminal exploitation is not identified as a specific exploitation type within these Acts, the offence of criminal exploitation, including online, fits the definition of human trafficking or other forms of modern slavery, depending on the circumstances. This legislation therefore remains particularly relevant in preventing the recruitment of children online into criminal exploitation.

Importantly, each piece of UK legislation offers a statutory defence or provides for non-punishment through other statutory means (in Scotland). This aims to protect children who have been forced to commit a crime through exploitation, from being prosecuted for that crime. Where children are witnesses in court, special measures should be afforded to them and in each jurisdiction, a child identified as potentially trafficked is entitled to help and assistance from an Independent Child Trafficking Guardian (ICTG).

---

[70] United Kingdom Parliament (2026) *Crime and Policing Act 2026.*
[71] See: United Kingdom Parliament (2015) *Modern Slavery Act 2015,*
Scottish Parliament (2015) *Human Trafficking and Exploitation (Scotland) Act 2015, and*
Northern Ireland Assembly (2015) *Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act.*
[72] United Nations (2000) *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.* Available at: https://assets.publishing.service.gov.uk/media/5a7c65a5e5274a7ee501ab03/5815.pdf
[73] Council of Europe (2005) *Council of Europe Convention on Action against Trafficking in Human Beings and its Explanatory Report.* Available at: https://rm.coe.int/168008371d
[74] European Parliament and Council of the European Union (2011) *Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims.* Available at: https://eur-lex.europa.eu/eli/dir/2011/36/oj/eng

Within the Acts, provision is made for Trafficking Risk and Prevention Orders (England, Wales and Scotland) or Trafficking Reparation and Prevention Orders (Northern Ireland), which aim to disrupt harm before it has happened, or prevent further harm from taking place.

The Acts provide strong sentencing powers, with a maximum sentence on conviction of a modern slavery, human trafficking or exploitation offence, of up to life imprisonment.

England and Wales's' Modern Slavery Statutory Guidance 2026,[75] Scotland's Trafficking and Exploitation Strategy 2025[76] and Northern Ireland's Modern Slavery and Human Trafficking Strategy 2024-2027,[77] bring emerging harms into the frame, including online exploitation for criminal purposes and online harms more generally. In Northern Ireland this is further strengthened, through the Child Criminal Exploitation Action Plan 2024.[78] The Plan focuses on increasing awareness of CCE, including online, preventing harm from organised crime groups and paramilitary-linked exploitation, protecting victim-survivors through early identification and multi-agency safeguarding responses and pursuing offenders through enhanced intelligence sharing and strengthening of police and justice system responses. To date, Northern Ireland is the only UK nation to implement a targeted plan focused on CCE.

3.2.3b Communication offences

The recruitment of children online into criminal exploitation often involves coercion, control and threats. These things may take place online, including within end-to-end encrypted spaces. The Malicious Communications Act 1988,[79] the Malicious Communications (Northern Ireland) Order 1988[80] and the Communications Act 2003[81] target harmful communication that might be seen as coercive or threatening.

---

[75] Home Office (2026) *Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland. Version 4.6.* Available at: https://assets.publishing.service.gov.uk/media/6a0486afda82768016cb3ee9/MSSG_v4.6.pdf

[76] Scottish Government (2025) *Scotland's trafficking and exploitation strategy 2025.* Available at: https://www.gov.scot/publications/scotlands-trafficking-exploitation-strategy-2025/pages/5/

[77] Department of Justice (Northern Ireland) (2024) *Northern Ireland Modern Slavery and Human Trafficking Strategy 2024 – 2027.* Available at: https://www.justice-ni.gov.uk/sites/default/files/publications/justice/modern-slavery-strategy-24-27.pd

[78] Department of Health (Northern Ireland) (2023) *Department of Health Child Criminal Exploitation Action Plan.* Available at: https://www.health-ni.gov.uk/sites/default/files/publications/health/doh-cce-action-plan.pdf

[79] United Kingdom Parliament (1988) *Malicious Communications Act 1988.* Available at: https://www.legislation.gov.uk/ukpga/1988/27/section/1

[80] Northern Ireland Assembly (1988) *The Malicious Communications Act (Northern Ireland) Order 1988.* Available at: https://www.legislation.gov.uk/nisi/1988/1849/made

[81] United Kingdom Parliament (2003) *Communications Act 2003.* Available at: https://www.legislation.gov.uk/ukpga/2003/21/contents

Section 127 of the Communications Act 2003 is particularly relevant when considering CCE, because it explicitly targets threatening online messages, grossly offensive communications, menacing electronic messages and improper use of communications networks.[82] The Act can help to promote early intervention before harm escalates, and support evidence-led prosecution.

Part 10 of the Online Safety Act 2023 strengthens previous communications legislation through implementing offences for false and threatening communications.[83]

3.2.3c Sexual offences

Children impacted by CCE may also experience sexual exploitation and other forms of sexual abuse, online, offline, or in both spaces. Child Sexual Exploitation and Abuse can also be criminally motivated. The Council of Europe Convention on Cybercrime (Budapest Convention) 2001 focuses on protecting children from Child Sexual Exploitation and Abuse and Child Sexual Abuse Material, as well as other cybercrime offences and cross-border cyber investigations.[84] The Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention) 2007 has a similar focus, but includes additional reporting duties where professionals have a concern that a child is suffering sexual exploitation or abuse.[85]

Similar responses to sexual exploitation and abuse are reflected in the Sexual Offences Act 2003 (England and Wales),[86] Sexual Offences (Northern Ireland) Order 2008[87] the Sexual Offences (Scotland) Act 2009.[88] These Acts address the online and offline sexual exploitation and abuse of children. The Acts provide clear offences for grooming and exploitation, offer early intervention powers, disruption through Sexual Harm Prevention Orders and deterrence through strict penalties.

[82] ibid
[83] United Kingdom Parliament (2023) *Online Safety Act 2023 - Part 10: Communications Offences.* Available at: https://www.legislation.gov.uk/ukpga/2023/50/part/10
[84] Council of Europe (2009) *Convention on Cybercrime.* Available at: https://www.europarl.europa.eu/cmsdata/179163/20090225ATT50418EN.pdf
[85] Council of Europe (2007) *Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse.* Available at: https://assets.publishing.service.gov.uk/media/5bcef61640f0b644248d5998/council-of-europe-convention-protection-of-children-against-sexual-exploitation-and-sexual-abuse-Cm-9687.pdf
[86] United Kingdom Parliament (2003) *Sexual Offences Act 2003.* Available at: https://www.legislation.gov.uk/ukpga/2003/42/contents
[87] Northern Ireland Assembly (2008) *The Sexual Offences (Northern Ireland) Order 2008.* Available at: https://www.legislation.gov.uk/nisi/2008/1769/contents
[88] Scottish Parliament (2009) *Sexual Offences (Scotland) Act 2009.* Available at: https://www.legislation.gov.uk/asp/2009/9/contents

3.2.3d Firearms and weapons offences

Children recruited online into criminal exploitation may be forced to hold, store and move firearms and weapons. They may be required to use such weapons as part of initiation rituals or carry weapons to protect themselves.

The Firearms Act 1968,[89] Criminal Justice Act 1988,[90] Offensive Weapons Act 2019[91] and Crime and Policing Act 2026[92] provide clear offences on the possession and supply of firearms and other weapons and enable early disruption and deterrence through strong sentencing powers.

The Crime and Policing Act 2026 is particularly relevant to the offence of online recruitment into criminal exploitation as it offers a strong sentencing framework for organised violence and exploitation involving knives.[93]

The value of firearms and weapons legislation to children impacted by criminal exploitation is that it should support a child-centred approach, ensuring that exploited children found with firearms or weapons are viewed first as victim-survivors in need of protection, rather than as offenders subject to prosecution.

3.2.3e Serious crime

Children who are coerced to undertake criminal activity might be forced to hold, store and/or move drugs. The Misuse of Drugs Act 1971[94] is therefore of particular relevance and has been utilised to prosecute offenders who have forced children to move drugs across the UK, through 'county lines' exploitation models.

The Criminal Justice and Licensing (Scotland) Act 2010[95] focuses on serious and violent crime and offences within the Act can aid in disrupting networks that are harmful to children.

The Serious Crime Act 2015,[96] takes a further step, by focusing on organised crime and exploitation, including coercive and controlling behaviour, computer misuse and cyber-enabled offending.

---

[89] United Kingdom Parliament (1968) *Firearms Act 1968.* Available at: https://www.legislation.gov.uk/ukpga/1968/27
[90] United Kingdom Parliament (1988) *Criminal Justice Act 1988.* Available at: https://www.legislation.gov.uk/ukpga/1988/33/contents
[91] United Kingdom Parliament (2019) *Offensive Weapons Act 2019.* Available at: https://www.legislation.gov.uk/ukpga/2019/17/contents
[92] United Kingdom Parliament (2026) *Crime and Policing Act 2026.*
[93] ibid
[94] United Kingdom Parliament (1971) *Misuse of Drugs Act 1971.* Available at: https://www.legislation.gov.uk/ukpga/1971/38/contents
[95] Scottish Parliament (2010) *Criminal Justice and Licensing (Scotland) Act 2010.* Available at: https://www.legislation.gov.uk/asp/2010/13/contents
[96] United Kingdom Parliament (2015) *Serious Crime Act 2015.* Available at: https://www.legislation.gov.uk/ukpga/2015/9/contents

Organised criminality and the Serious Violence Duty are a focus of the Police, Crime, Sentencing and Courts Act 2022[97] requiring public authorities to work together to identify risk, share information and create local strategies to reduce serious violence. The Act increased penalties for serious violence, weapon offences and organised criminality.

Most recently, the Crime and Policing Act 2026 provides for development of a legal definition of CCE, alongside CCE related offences, and disruption via Child Criminal Exploitation Prevention Orders. The Act also adds CCE offences to the list of 'criminal lifestyle offences' under the Proceeds of Crime Act 2002.[98]

3.2.3f Fraud

Children recruited into criminal exploitation online may also experience financial exploitation. They might be forced to open bank accounts, move money, launder money or participate in fraudulent business. The Fraud Act 2006[99] can be utilised to help dismantle networks exploiting children for criminal and financial gain. The Act provides clear offences for deception-based exploitation, indirectly supports safeguarding through deterrence mechanisms and use of the Act can offer strong evidential pathways when used alongside other legislation to prosecute criminal exploitation offences.

3.2.3g Proceeds of crime

The Proceeds of Crime Act 2002 can be applied to target organised crime networks, seize assets and recover money or assets obtained through criminal activity.[100] This can provide both a deterrent and a means to disrupt exploitation, acting as an indirect safeguard for children. In addition, the Act supports broader criminal justice outcomes when used alongside other laws.

The criminal justice framework contains a wide range of offences and powers capable of addressing the online recruitment and exploitation of children for criminal purposes. Together, modern slavery, human trafficking and exploitation, communications, sexual, firearms and weapons, serious crime and fraud legislation provide opportunities to identify victim-survivors, disrupt offending and prosecute perpetrators. The introduction of specific Child Criminal Exploitation

[97] United Kingdom Parliament (2022) *Police, Crime, Sentencing and Courts Act 2022.* Available at: https://www.legislation.gov.uk/ukpga/2022/32/contents
[98] United Kingdom Parliament (2026) *Crime and Policing Act 2026.*
[99] United Kingdom Parliament (2006) *Fraud Act.* Available at: https://www.legislation.gov.uk/ukpga/2006/35/contents
[100] United Kingdom Parliament (2002) *Proceeds of Crime Act 2002.* Available at: https://www.legislation.gov.uk/ukpga/2002/29/contents

offences through the Crime and Policing Act 2026 represents a significant development in recognising this form of harm.

However, many responses remain reactive, evidential challenges persist within digital environments, and children who are exploited continue to risk criminalisation where exploitation is not recognised. Effective protection therefore depends on ensuring that criminal justice responses are aligned with child protection systems and maintain a clear child-first focus.

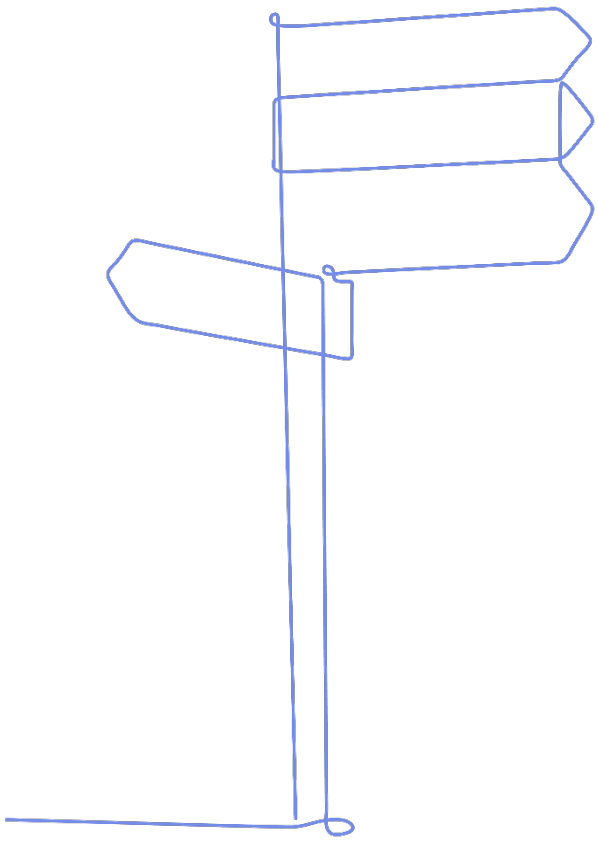


Table 5: Preventing crime and prosecuting offenders - strengths and gaps in the related legislation, policy and guidance

Type	Legislation, policy, guidance	Strengths	Gaps
Modern Slavery, Human Trafficking and Exploitation	Modern Slavery Act 2015	• Clear offence categories • Victim-survivor protection and support framework: ➢ s.45 Defence – non-punishment principle ➢ s.46 Special measures ➢ s.48 Independent Child Trafficking Advocates (Guardians) ➢ s.51 Presumption of age ➢ s.52 Duty to Notify • Disruption mechanisms – Slavery and Trafficking Risk and Prevention Orders • Strong sentencing powers – maximum penalty on conviction of life imprisonment	• The Act pre-dates modern forms of exploitation • No explicit recognition of CCE • CCE not always recognised as a form of modern slavery, impacting protection and support mechanisms • Online exploitation often not recognised leading to slow and variable safeguarding processes • Reliance on interpretation, professional judgement and local practices, funding and resources • Children may still be criminalised • NRM referrals vary in quality, with slow and inconsistent decision-making • Limited use of Slavery and Trafficking Risk and Prevention Orders • Limited enforcement and convictions

	The Slavery and Human Trafficking (Definition of Victim) Regulations 2022 (England and Wales)	• Clarifies 'victim' definition across agencies	• No explicit recognition of CCE
	Modern Slavery Statutory Guidance: Version 4.6 (2026)	• Explicit inclusion of CCE • Promotes awareness raising and early identification • Offers practical indicators of exploitation • Offers guidance on evidence gathering • Supports enforcement under the Modern Slavery Act 2015 • Promotes the non-punishment principle • Victim-survivor centred approach	• Limited focus on modern digital exploitation systems • NRM referrals vary in quality, with slow and inconsistent decision-making • Reliance on interpretation, professional judgement and local practices, funding and resources
	Home Office Action Plan on Modern Slavery 2025 – 2026	• Sets national priorities for enforcement and support • Focus on disrupting exploitation networks	• Not legally enforceable • Dependent on agency implementation which may vary

		• Promotes development of safeguarding pathways, provision of support and multi-agency working • Focus on disrupting gang structures and identifying and prosecuting offenders • Promotes the use of financial, digital and intelligence-led evidence • Promotes improvements to international cooperation	
	Human Trafficking and Exploitation (Scotland) Act 2015	• Clear offence categories • Public health approach Victim-survivor protection and support framework: ➢ s. 8 Non-punishment principle – child first focused ➢ s.11 Independent Child Trafficking Guardians ➢ s.12 Presumption of age	• The Act pre-dates modern forms of exploitation • No explicit recognition of CCE • CCE not always recognised as a form of modern slavery, impacting protection and support mechanisms • Online exploitation often not recognised leading to slow and variable safeguarding processes

		➢ s. 38 Duty to Notify • Disruption mechanisms – Trafficking and Exploitation Risk and Prevention Orders • Strong sentencing powers – maximum penalty on conviction of life imprisonment	• Reliance on interpretation, professional judgement and local practices, funding and resources • Children may still be criminalised • NRM referrals vary in quality, with slow and inconsistent decision-making • Limited use of Trafficking and Exploitation Risk and Prevention Orders • Limited enforcement and convictions
	Scotland's Trafficking and Exploitation Strategy 2025	• Multi-agency and system-wide strategy • Public health approached focused on tackling underlying risks • Recognises technology-facilitated exploitation • Focus on early intervention and awareness • Focus on intelligence-led disruption of exploitation networks	• Relies on existing law • Success is dependent on implementation across agencies which could vary

		• Trauma-informed and survivor-centred	
	Human Trafficking and Exploitation (Criminal Justice) Northern Ireland Act 2015	• Clear offence categories • Public health approach • Victim-survivor protection and support framework: ➢ s.13 Duty to Notify ➢ s. 21 Independent Guardians ➢ s. 22 Defence – non-punishment principle ➢ s. 24 Special measures • Disruption mechanisms – Slavery and Trafficking Reparation and Prevention Orders • Strong sentencing powers – maximum penalty on conviction of life imprisonment	• The Act pre-dates modern forms of exploitation • No explicit recognition of CCE • CCE not always recognised as a form of modern slavery, impacting protection and support mechanisms • Online exploitation often not recognised leading to slow and variable safeguarding processes • Reliance on interpretation, professional judgement and local practices, funding and resources • Children may still be criminalised • NRM referrals vary in quality, with slow and inconsistent decision-making • Limited use of Slavery and Trafficking Risk and Prevention Orders • Limited enforcement and convictions

	Northern Ireland's Modern Slavery and Human Trafficking Strategy 2024 – 2027	• CCE is recognised as a form of exploitation • Operational model to pursue, protect, prevent • Focus on training and awareness • Focus on reducing risks • Survivor-centred • Promotes multi-agency working • Focus on identifying and prosecuting offenders and dismantling organised crime groups • Focus on improving intelligence-led policing	• Not legally binding • Online exploitation often not recognised leading to slow and variable safeguarding processes • Reliance on interpretation, professional judgement and local practices, funding and resources
Communication	Malicious Communications Act 1988	• Targets harmful communication that might be coercive or threatening • Relevant to online grooming and recruitment of children for CCE • Promotes early intervention before escalation of harm	• Pre-dates modern forms of exploitation • Focus is on individual communications and not networks • Relies heavily on victim-survivor reporting and / or digital evidence

		• Supports evidence-led prosecution • Flexible and widely applicable across platforms	
	Malicious Communications (Northern Ireland) Order 1988	• Targets coercive communication • Relevant to online grooming and recruitment of children for CCE • Promotes early intervention before escalation of harm • Supports evidence-led prosecution • Flexible and widely applicable across platforms	• Pre-dates modern forms of exploitation • Focus is on individual communications and not networks • Threshold for offence is high • Relies heavily on victim-survivor reporting and / or digital evidence • Reactive rather than preventative • Outdated in relation to modern digital environments – encryption, disappearing messages, closed online communities and AI-driven grooming techniques
	Communications Act 2003	• s. 127 targets threatening online messages, grossly offensive communications, menacing electronic messages and improper use of communications networks	• Pre-dates modern forms of exploitation • Focus is on individual communications and not networks

		• Relevant to online grooming and recruitment of children for CCE • Promotes early intervention before escalation of harm • Supports evidence-led prosecution • Flexible and widely applicable across platforms	• Threshold for what constitutes 'grossly offensive communication' is high • Relies heavily on victim-survivor reporting and / or digital evidence • Reactive rather than preventative • Outdated in relation to modern digital environments – encryption, disappearing messages, closed online communities and AI-driven grooming techniques
Sexual offences	Council of Europe Convention on Cybercrime (Budapest Convention) 2001 Council of Europe	• Focus on CSEA and CSAM • International cooperation framework • Strong digital evidential powers • Adaptable to cyber-enabled crime • Supports disruption of organised criminal systems • Encourages cooperation with technology providers	• Limited victim-survivor centred safeguarding focus • Reactive rather than preventative • Outdated in relation to modern digital environments – encryption, disappearing messages, closed online communities and AI-driven grooming techniques
	Convention on the Protection of Children against Sexual	• Focus on CSEA and CSAM	• Outdated in relation to modern digital environments – encryption, disappearing

	Exploitation and Sexual Abuse (Lanzarote Convention) 2007	• International cooperation framework • Promotes victim-centred approach • Includes reporting duties	messages, closed online communities and AI-driven grooming techniques
	Sexual Offences Act 2003 (England and Wales)	• Focus on CSEA, including online grooming methods • Clear offences for grooming and exploitation • Focus on safeguarding children • Criminalises grooming behaviours and aims to tackle organised exploitation • Disruption and risk management mechanism – Sexual Harm Prevention Orders	• Dependent on reporting and disclosure • Complex evidential thresholds – evidence of intent, patterns of communication, corroboration • Outdated in relation to modern digital environments – encryption, disappearing messages, closed online communities and AI-driven grooming techniques
	Sexual Offences (Scotland) Act 2009	• Focus on CSEA, including online grooming methods • Clear offences for grooming and exploitation • Focus on safeguarding children	• Dependent on reporting and disclosure • Complex evidential thresholds – evidence of intent, patterns of communication, corroboration

		• Criminalises grooming behaviours and aims to tackle organised exploitation • Disruption and risk management mechanism – Sexual Harm Prevention Orders	• Outdated in relation to modern digital environments – encryption, disappearing messages, closed online communities and AI-driven grooming techniques
	Sexual Offences (Northern Ireland) Order 2008	• Focus on CSEA, including online grooming methods • Clear offences for grooming and exploitation • Focus on safeguarding children • Criminalises grooming behaviours and aims to tackle organised exploitation • Disruption and risk management mechanism – Sexual Harm Prevention Orders	• Dependent on reporting and disclosure • Complex evidential thresholds – evidence of intent, patterns of communication, corroboration • Outdated in relation to modern digital environments – encryption, disappearing messages, closed online communities and AI-driven grooming techniques
Firearm and weapons	Firearms Act 1968 (and amendments)	• Clear offences on possession and supply of firearms • Enables early disruption	• Children could be criminalised for carrying firearms if not recognised as a victim-survivor

		• Strong sentencing powers	
	Criminal Justice Act 1988	• Helps to prosecute people who assist offenders and support the criminal enterprise	• Reactive rather than preventative • Doesn't recognise exploitation of children specifically
	Offensive Weapons Act 2019	• Disrupts access to weapons • Clear knife offences and possessing corrosive substances in public without good reason • Stronger penalties for weapon possession and threats	• Reactive rather than preventative • Children could be criminalised for carrying a weapon if not recognised as a victim-survivor
	Crime and Policing Act 2026	• Focus on reducing weapon supply chains – including online sales • Increased police seizure powers • Mandatory reporting of bulk knife sales • Strong prosecution and sentencing framework for repeat weapon offending, organised violence and exploitation involving knives	• Reactive rather than preventative • Children could be criminalised for carrying a weapon if not recognised as a victim-survivor

Serious crime	Misuse of Drugs Act 1971	• Clear drug offences • Enables disruption of criminal networks • Strong sentencing powers • Flexible evidential thresholds • Often used in 'county lines' prosecutions	• Reactive rather than preventative • Children could be criminalised for carrying a weapon if not recognised as a victim-survivor
	Criminal Justice and Licensing (Scotland) Act 2010	• Focus on serious and violent crime • Strengthens the sentencing frameworks • Supports disruption of exploitation • Indirectly protects children	• Limited focus on grooming and coercion
	Serious Crime Act 2015	• Focus on organised crime and exploitation, including coercive and controlling behaviour, computer misuse and cyber-enabled offending	• Dependent on effective safeguarding systems, requiring resource, knowledge and coordination • Outdated in relation to modern digital environments – encryption, disappearing

		• Focus on protection of children • Focus on psychological harm and grooming • Focus on disruption of criminal systems	messages, closed online communities and AI-driven grooming techniques
	Police, Crime, Sentencing and Courts Act 2022	• Focus on a Serious Violence Duty requiring public authorities to work together to identify risk, share information and create local strategies to reduce serious violence • Partnership working through Violence Reduction Units • Increased penalties for serious violence, weapon offences and organised criminality • Introduced Serious Violence Reduction Orders aiming to reduce knife offences	• Limited sanctions if information sharing fails or interventions do not work • Reliance on interpretation, professional judgement and local practices, funding and resources

	Crime and Policing Act 2026	• Provides for a legal definition of CCE to be developed • Clear offences of CCE, cuckooing and internal concealment • Child-first focused – non-punishment principle • Disruption and risk management mechanism – CCE Prevention Orders • The Act adds CCE offences to the list of 'criminal lifestyle offences' under the Proceeds of Crime Act 2002	• Statutory definition not provided in the Act • No recognition of online recruitment for CCE • The offence only relates to the harm of children with not separate offence for adults impacted by criminal exploitation. The Act does not account for the transition from childhood to adulthood and the potential that children harmed before they turn 18, could continue to be harmed into adulthood • The Act is offence-focused, rather than harm focused, missing the relational dynamics of grooming, coercion and control that take place prior to an offence occurring • It will take time for CCE Prevention Orders to be systematically used and there is a risk that they will not be utilised as widely as hoped for, as can be seen by similar Orders focusing on slavery and trafficking risk and prevention • The offence carries up to 10 years' imprisonment on conviction whereas if convicted as a trafficking or modern

			slavery offence, this could be up to life imprisonment
Fraud	Fraud Act 2006	• Clear offences for deception-based exploitation • Helps dismantle networks exploiting children for criminal gain • Indirectly supports safeguarding – deterrence against deceptive recruitment and exploitation, child-first focused • Relevant to modern exploitation – online scams, financial grooming, cyber-enabled exploitation • Strong evidential pathways – financial and digital evidence often clear • Supports broader criminal justice outcomes – modern slavery, laundering, organised crime	• Will need to be used with other legislation in CCE cases as this Act does not focus on exploitation explicitly

Proceeds of Crime	Proceeds of Crime Act 2002	• Attacks the profit motive behind exploitation • Targets organised crime networks • Supports broader criminal justice outcomes – modern slavery, laundering, organised crime • Indirectly supports safeguarding through disruption	• Focus on assets, not harm • Does not address recruitment methods • Dependent on successful criminal investigation

3.3 Legislation, Policy and Guidance – Bearings for the future

The evolving legislative, policy and guidance landscape across the UK provides important bearings for the future, highlighting opportunities to strengthen responses to the online recruitment of children into criminal exploitation, while also creating potential for further divergence, gaps and inconsistency across jurisdictions.

3.3.1 Uncertainty about the relationship between CCE and modern slavery, human trafficking and exploitation frameworks

The introduction of a statutory definition of CCE through the Crime and Policing Act 2026 creates uncertainty about the relationship between the new CCE offence and existing modern slavery, human trafficking and exploitation legislation. Where a child is identified as experiencing criminal exploitation, particularly through online recruitment, it is unclear whether they should continue to be considered potentially trafficked and referred into the National Referral Mechanism (NRM), or whether identification under the CCE legislation will increasingly become the primary route to protection and support. This creates potential for variation in professional decision-making and the application of different legislative pathways to children experiencing the same forms of exploitation.

The distinction between CCE and modern slavery, human trafficking and exploitation legislation may have implications for children's access to specialist protections. In particular, children who are identified as experiencing criminal exploitation but are not recognised as potential victim-survivors of trafficking or another form of modern slavery, will not be eligible to access services provided by Independent Child Trafficking Guardian's for example. This creates a risk of inequity in access to specialist support, particularly where children's experiences of exploitation are similar but their route to identification differs.

There is also potential for children experiencing criminal exploitation to fall simultaneously within the scope of the CCE offence and existing offences relating to trafficking, slavery, servitude or forced or compulsory labour. While the application of multiple frameworks could strengthen recognition of children's experiences and increase access to protection, it may also create uncertainty about professional responsibilities, referral pathways and children's rights and entitlements. Clear guidance on how this legislation should operate alongside one another will therefore be important.

The application of the new CCE offence to children could also create a gap in protection as young people transition into adulthood. Where exploitation begins during childhood but continues beyond the age of 18, the CCE offence outlined by the Crime and Policing Act 2026 will no longer apply. Modern slavery, human trafficking and exploitation legislation may provide an alternative route to protection in some circumstances, but the relationship between these frameworks and the continuity of support for young people experiencing ongoing exploitation requires further consideration.

3.3.2 Increasing complexity in perpetrator disruption and prosecution

The introduction of CCE-specific prevention and protection measures alongside existing mechanisms for disrupting perpetrators creates an increasingly complex enforcement landscape. Trafficking Risk Orders, Prevention Orders, Reparation Orders, CCE Prevention Orders and, where relevant, Sexual Harm Prevention Orders may all have potential application in situations involving the exploitation of children. Without clear guidance on how these orders should be used individually or in combination, there is potential for variation in enforcement practice and missed opportunities to disrupt perpetrators.

Also, the coexistence of the CCE offence with existing modern slavery, human trafficking and exploitation offences creates potential for similar patterns of exploitation to be prosecuted under different legislation. This may result in differences in charging decisions, prosecution pathways and sentencing outcomes where comparable harms are experienced by children. Clear guidance will be required to support consistency, proportionality and a child-centred approach to prosecution.

3.3.3 Dispersed data and intelligence

The introduction of the Crime and Policing Act 2026 as an additional legislative pathway for identifying children affected by criminal exploitation may further disperse the data available on the scale and nature of child exploitation. If children are recorded differently depending on whether they are identified through the CCE offence, modern slavery, human trafficking and exploitation offences, or safeguarding or criminal justice frameworks, this may affect the reliability and comparability of prevalence data. It may also make it more difficult to identify emerging patterns, inform commissioning decisions and evaluate the effectiveness of interventions.

Taken together, these findings indicate that the introduction of a new CCE definition and offence has the potential to further distort an already complex legislative and practice landscape. Rather than reducing uncertainty, the creation of additional offence-specific frameworks may result in children experiencing similar forms of exploitation being identified, supported and protected through different routes. This raises a broader question about whether the legislative and policy landscape would better meet children's needs if exploitation were considered through a more integrated framework, rather than through siloed categories of exploitation.

One potential approach would be the development of a statutory offence of 'child exploitation', encompassing different forms of exploitation and recognising that children may experience multiple or changing forms of harm.[101] Such an approach could support more consistent identification, enable a more holistic assessment of children's needs and risks, and promote greater equity in access to protection and support. It could also provide a more future-proof legislative framework, reducing the need to create new offence-specific legislation as new forms or methods of exploitation emerge.

An alternative would be to retain the existing modern slavery, human trafficking and exploitation legislation as it is sufficiently broad and adaptable to encompass emerging forms of harm. Under this approach, additional statutory guidance and practice guidance could provide the necessary clarity on how existing provisions should be applied to new and evolving forms of exploitation.

4. Conclusions

The review aimed to explore how online recruitment into criminal exploitation fits within current UK legal definitions, law, policy and guidance frameworks and whether gaps exist. The analysis also sought to include how harm is prevented, how children are identified and protected and how perpetrators can be disrupted and prosecuted.

The desk-based research included 59 pieces of legislation, policy and guidance, alongside relevant codes, frameworks, strategies and plans, relevant to all four UK nations, Europe and internationally where relevant.

[101] ECPAT UK (2025) *More than words: how definitions impact on the UK's response to child trafficking and exploitation.* Available at: https://www.ecpat.org.uk/Handlers/Download.ashx?IDMF=286813c5-db33-422b-aea1-d7dc2489ddec

This report outlines the strengths and gaps within the legislation and policy landscape across digital regulation and data protection, children's rights and child protection, and crime prevention and prosecution. The analysis shows the UK to have robust legislation, policy and guidance, which can be utilised to help prevent online harm to children and protect and support them when harm does occur. However, the landscape is significantly fragmented, reducing efficacy in the mechanisms which have been set up to protect children online and offline. Harm is fast evolving and it appears that perpetrators are diversifying at a quicker pace than legislation is drafted and protection systems mobilised. Seemingly, perpetrators remain one-step ahead, evading detection and disruption, leaving children at risk of online recruitment into criminal exploitation.

The review demonstrates that protecting children online is not only the responsibility of digital platform providers, of public authorities and the criminal justice system. Safeguarding and protecting children is everyone's responsibility. From parents and carers, neighbourhoods and communities, schools and colleges, all public authorities and criminal justice systems. The responsibility is platform providers and Ofcom as the regulator, as well as the UK Government and governments in the devolved nations. In addition, adults have a responsibility to create spaces in which children feel safe to express their views and discuss aspects of their online experiences that affect them, both positively and negatively.

Every child has the right to safety, to be protected from violence, abuse and neglect, human trafficking, and other forms of exploitation[102] - in both online and offline worlds. Children have the right to access online spaces from which they can learn, develop and grow. They have the right to be part of the conversation; to co-create safe online spaces for everyone. They have the right to be protected within the digital environment, rather than to be protected from it.

5. Recommendations

Recommendation 1: Embed a child-rights approach to policy and practice development, including digital safety

Greater consistency is needed in how children affected by exploitation are recognised and responded to. UK Government and devolved administrations should embed a consistent child-rights, child-first approach across digital regulation – both existing and future - children's rights and child protection, and criminal justice

[102] United Nations (1989) *Convention on the Rights of the Child.* Available at: https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf

policy and practice responses to child exploitation, ensuring children are recognised as victim-survivors of abuse rather than offenders.

Recommendation 2: Develop and implement a statutory definition of Child Exploitation

To mitigate risks associated with siloing exploitation types, the Home Office and Department for Education should develop and implement a statutory definition of Child Exploitation. This should account for both online and offline recruitment of children into all forms of exploitation, including where they intersect. The definition should align with international human trafficking standards and recognise recruitment and harbouring as acts of trafficking, rather than requiring movement or travel for exploitation to be recognised.[103]

Recommendation 3: Establish nationally a set of minimum standards to ensure consistency in the prevention, identification, safeguarding and support of children recruited into exploitation.

There is a need for greater consistency in how children recruited into exploitation are identified, assessed and supported across safeguarding, education, health and criminal justice systems. The UK Government and devolved administrations should establish a UK-wide set of minimum standards for the prevention, identification, safeguarding and support of children recruited into exploitation. The aim, to promote a coordinated and child-centred response across agencies and jurisdictions, with specific focus on children's outcomes. The standards should set out expectations for recognising recruitment pathways, undertaking multi-agency risk assessment and support, sharing relevant information, developing coordinated safety plans, disrupting exploitation and consistently recognising children as victim-survivors of abuse.

Implementation should be supported through up to date legislation, evidence-informed statutory guidance, workforce development, multi-agency training, professional standards and inspection frameworks. The Department for Education, Home Office and Department of Health and Social Care should have defined responsibilities for implementation, working with devolved administrations, professional regulators and workforce development bodies.

Recommendation 4: Develop an integrated, UK Cross-Government information gathering strategy for child exploitation.

In response to the current fragmentation of information held across protection systems, about children impacted by CCE and other forms of exploitation, the UK Government and devolved administrations should develop an integrated

[103] ECPAT UK (2025) *More than words: how definitions impact on the UK's response to child trafficking and exploitation.*

information-gathering strategy for child exploitation. The strategy should establish common data requirements and consistent approaches to the identification, collection, recording, sharing and analysis of information across digital regulation, child protection, education and health, criminal justice and the National Referral Mechanism.

This should ensure that children affected by exploitation are consistently recognised and recorded, regardless of the route through which concerns are identified or a child enters a protection system. This includes through the National Referral Mechanism, child protection processes or the statutory definition of child exploitation under the Crime and Policing Act 2026 once developed. The strategy should establish mechanisms for bringing together and effectively using critical information across systems, ensuring that children affected by exploitation are visible to those responsible for identifying risk, preventing harm and providing protection and support.

The Home Office, Department for Education, Department of Health and Social Care, National Crime Agency and Ofcom should have defined responsibilities for implementing the strategy, working with the devolved administrations and relevant data and safeguarding bodies.

MODERN SLAVERY & HUMAN RIGHTS | POLICY & EVIDENCE CENTRE

Led by the University of Oxford

The Modern Slavery and Human Rights Policy and Evidence Centre (the PEC) at the University of Oxford exists to enhance understanding of modern slavery and transform the effectiveness of laws and policies designed to address it.

The Centre funds and co-produces high quality research with a focus on policy impact, and brings together academics, policymakers, businesses, civil society and survivors to collaborate on solving this global challenge.

The Centre is a consortium of three Universities of Oxford, Liverpool and Hull, and is funded by the Arts and Humanities Research Council (AHRC) on behalf of UK Research and Innovation (UKRI).

pec.office@humanities.ox.ac.uk
www.modernslaverypec.org

Author: Hannah Stott, Safe to Grow.

Published by: Modern Slavery and Human Rights Policy and Evidence Centre, University of Oxford.

Publication date: November 2026

©2026, Hannah Stott

This work is openly licensed under a Creative Commons Attribution 4.0 International Licence CC BY 4.0.

This work was supported by the Modern Slavery and Human Rights Policy and Evidence Centre, University of Oxford [reference number: [E0R00121_E00G.02] from its grant from the Arts and Humanities Research Council [grant number AH/T012412/2].

Identification number of the publication: PEC/2026/17

Our partners:

Funded by: