

Committee on the Application of Standards

Date: 19 May 2025

Governments appearing on the preliminary list of individual cases have the opportunity, if they so wish, to supply on a purely voluntary basis, written information before 19 May 2025.

► Information on the application of ratified Conventions supplied by governments on the preliminary list of individual cases

United Kingdom of Great Britain and Northern Ireland (ratification: 2000)

Worst Forms of Child Labour Convention, 1999 (No. 182)

The Government has provided the following written information.

This statement has been drafted by the Government of the United Kingdom and is supported by the representative groups for Workers and Employers, the Trades Union Congress (TUC) and the Confederation of British Industry (CBI) respectively. Both social partners welcome UK Government efforts to address the matters of concern and would welcome further progress in the areas described. However, neither feels it would currently be appropriate for these matters to be examined in the Committee as the Government and social partners will engage in meaningful tripartite discussions on the Convention in 2026, as part of a wider enhanced consultation process on the UK's application of ILO Conventions which is helping to inform decision-making.

We note the direct request and the social partner comments referenced are based on the UK report, circumstances and measures in place in 2019 and 2020. Substantial changes have been introduced in the five years since those reports:

- Since 2019: The Prevention Programme, working with partner organizations to spot and address child exploitation and share best practice to achieve sustainable change.
- 2021: Pilot to devolve National Referral Mechanism (NRM) decision-making on potential child victims of modern slavery to local authorities, to improve safeguarding.
- July 2022: Launch of the defence strategy on tackling sexual offending, including zero tolerance of unacceptable sexual behaviour.
- 2023: Launch of the multi-agency statutory guidance, Working Together to Safeguard Children (2023), to collaborate to best safeguard and promote the welfare of children in local areas.

- March 2023: Launch of the Victim Witness Care Unit to support victims and witnesses of crime within the UK Armed Forces.
- 2024: The Children's Wellbeing and Schools Bill, with measures to facilitate a coherent multi-agency approach to protect young people from exploitation.
- Since 2024: the County Lines Programme, to tackle this specific form of child criminal exploitation and support the young people involved.
- April 2024: Changes to the Independent Child Trafficking Guardian model, to enhance support to suspected child victims of modern slavery and improve communication and information sharing between relevant services.
- April 2025: Families First Partnership programme – a multi-agency approach to family support and child safeguarding, with £500 million funding.
- 2025: The Crime and Policing Bill, containing specific measures to address child criminal exploitation, currently passing through the UK Parliament.

Article 3 of the Convention. Worst forms of child labour. Clause (a). Sale and trafficking

Section 17 of the Children Act 1989 requires local authorities to provide a range and level of services appropriate to the needs of “children in need” for the purposes of safeguarding and promoting their welfare. Section 17 defines a child as being “in need” if they are unlikely to reach or maintain a satisfactory level of health and development or their health and development will be impaired without the need for additional services, or they are a disabled child.

The multi-agency statutory guidance, *Working Together to Safeguard Children* (2023) “Working Together”, which applies to England, clarifies the core legal requirements on individuals and organizations to keep children safe. It sets out, in one place, the legal requirements that local authorities, health services, police, schools and other organizations who work with children should follow. The guidance is also clear that local authorities, with their safeguarding partners (local authority, police and health), should develop and publish local protocols for assessment and that local protocols should reflect the specific needs of certain groups including asylum seeking children and children considered at risk of exploitation and harm outside the home.

Working Together (2023) also includes information on the NRM, the UK's system for identifying victims of modern slavery and human trafficking. The guidance makes clear that where practitioners have concerns that a child may be a potential victim of modern slavery, then a referral should be made to the NRM as soon as possible.

From April 2025, £500m will be made available to local authorities to roll out reforms to family help and multi-agency child protection, including where harm is outside the home. We have set up the Families First Partnership programme to support the delivery of reforms, with local areas beginning transformation from April 2025.

Specific measures to tackle the causes of child trafficking have been set out in the Government's Crime and Policing Bill, which will create a new stand-alone offence to prosecute adults committing child criminal exploitation and creating a new regime for child criminal exploitation civil preventative orders to prevent exploitative conduct committed by adults against children from occurring or reoccurring.

We know that children experiencing exploitation are likely to be not enrolled in school or with poor or patchy attendance. The Children's Wellbeing and Schools Bill introduces a number of measures to tackle this issue and protect young people from exploitation. These include mandatory registration of all children not in school and the introduction of a unique identifying number for each child, which will allow those responsible for the safeguarding and welfare of children to better join relevant data and identify children who will benefit from additional support. Where a child's home environment is assessed as unsuitable or unsafe, local authorities will have the power to intervene and require school attendance.

The UK continues to respond to all forms of child exploitation through a Home Office-funded Prevention Programme, delivered by The Children's Society. This seeks to drive forward new responses to prevent and improve responses to exploitation and abuse. Through the Programme, we fund regional coordinators who work with, and improve collaboration within, partners across statutory, third and private sectors to deliver tailored interventions to prevent and disrupt child sexual abuse and exploitation, child criminal exploitation, child financial exploitation, and modern slavery and human trafficking.

As part of the Prevention Programme, The Children's Society is funded to deliver the award winning #LookCloser campaign – a national campaign, supported by the British Transport Police and the National County Lines Coordination Centre, aiming to raise awareness of child exploitation and how everyone can help stop it. County lines exploitation is a form of criminal exploitation in the UK where children and vulnerable adults are coerced into transporting, storing, or selling drugs across different regions, often from urban areas to rural or coastal towns.

The campaign has directly reached more than 275,000 people.

Child Criminal Exploitation

The UK Government is introducing a new offence of child criminal exploitation (CCE) in the Crime and Policing Bill. The new offence aims to increase convictions against exploiters, deter gangs from enlisting children, and improve identification of victims. The new offence will carry a maximum penalty of 10 years' imprisonment.

The UK Government is also creating a new regime of CCE prevention orders to prevent exploitative conduct committed by adults against children from occurring or re-occurring. Breach of these orders will be a criminal offence with a maximum penalty of five years' imprisonment.

Finally, from July to September 2024, policing activity delivered through the Home Office's County Lines Programme has resulted in over 800 safeguarding referrals of children and vulnerable people. Through the Programme, we also fund specialist support for children and young people caught up in county lines and child criminal exploitation, and since July 2024, more than 280 children and young people have received dedicated specialist support through our county lines support service, Catch22.

Identified victims referred to the NRM are offered appropriate support, as set out in the statutory guidance.

Devolved Decision-Making Pilot

The UK Government launched a devolved decision-making pilot in 2021, which devolves the responsibility to make NRM decisions for potential child victims of modern slavery to local authorities, so that – with their existing safeguarding structures – they can provide the most

appropriate care required for a child. Results of the pilot have been encouraging, suggesting devolving decision-making to local authorities enhances existing local safeguarding structures and the pilot also demonstrated quicker NRM decisions were taken in less time than the average time taken in the competent authorities. Following expansion in March 2023, there are now twenty pilot sites, covering 30 local authorities across England, Wales and Scotland. In April 2025 we launched a competition for grant funding to expand to ten more sites to further test the model.

Independent Child Trafficking Guardians

The UK Government funds an Independent Child Trafficking Guardianship (ICTG) service, which provides an independent source of advice and support for children who are suspected of being victims of modern slavery, irrespective of nationality or immigration status. ICTGs advocate on the child's behalf and work to ensure their best interests are reflected in the decision-making undertaken by public authorities involved in their care, while helping them orient criminal justice, immigration and social care systems. The ICTG programme operates in two thirds of local authorities in England and Wales. In the year ending March 2024, there were 2,478 referrals of potential child victims of modern slavery to the ICTG service. This was a 7 per cent decrease from the year ending March 2023 (2,674).

In April 2024, we made several changes to the ICTG model. The changes included:

- Increasing the flexibility of the service for children receiving direct support by delivering a hybrid combination of face-to-face and remote sessions based on a child's vulnerability factors.
- Extending the pilot whereby, in exceptional circumstances, children with a figure of parental responsibility for them in the UK can access direct support. This is now being provided to all children in ICTG areas.
- Improving the ICTG Interim Guidance, specifically the section encouraging public authorities to engage with and pay "due regard" to the ICTG Service. This now provides specific examples of information to be shared with the ICTG Service to improve communication and information sharing between professionals and the ICTG Service.

Clause (d). Hazardous work in military service

The UK Armed Forces have specific protections for recruits under the age of 18, ensuring their welfare, rights and safety during voluntary recruitment and training. These include: a requirement for written consent of all parents and/or guardians for recruitment; a statutory right to discharge within the first six months of service and specific provisions to allow discharge after this time; no intentional or planned deployment on operations that would expose them to combat situations; handling of live weapons only under strict supervision; and regular inspections of training establishments to ensure high welfare standards.

Junior entry training for those in the UK Armed Forces is youth-focused and includes educational provision via apprenticeship schemes, with a gradual increase of intensity of the physical training to ensure musculoskeletal development is supported effectively to condition all trainees including those under 18.

The UK Armed Forces do not target recruitment from low-income families, or from areas of social deprivation. Applicants under the age of 18 are only accepted with the written consent from all appropriate persons – those with legal parental responsibility or a legal guardian. The Armed Forces provide a positive career choice for those leaving school aged 16. The

recruitment of personnel under the age of 18 directly supports the Government's agenda on growth, prosperity and in particular, social mobility by providing significant opportunities and enhanced prospects. Each Service provides apprenticeships and further trade training, meaning that many young Service personnel who have often struggled in school settings can instead thrive. In this way the Armed Forces transforms the prospects of many of its personnel for the better.

The Joint Service Publication (JSP) 822 "Defence Direction and Guidance for Training and Education" is the authoritative policy that directs and guides the UK Armed Forces to ensure that Defence Learning (training and education) is appropriate, efficient, effective and, most importantly, safe. The policy appropriately outlines that Service personnel under the age of 18 have particular care and welfare needs as well as additional legal requirements beyond those that the Ministry of Defence already affords to all Service personnel. The policy acknowledges that maturity and experience can often vary considerably between individuals and as such those who are under the age of 18 may be more at risk than older trainees. It also directs establishments to provide comprehensive supervisory care directives and conduct and record a Commander's Risk Assessment. In addition to internal assurance of the care and welfare of trainees, the UK Ministry of Defence (MoD) commissions the Office for Standards in Education (Ofsted) to conduct independent inspections of UK Armed Forces training establishments, with their findings publicly published annually on the Gov.UK website.¹

The term psychological stressors covers a wide spectrum of events or situations that could challenge an individual's mental or emotional state; from major life changing and traumatic events, to minor daily events. Within any employment or education setting psychological stressors are present, including workloads or assessments. Within the UK Armed Forces, all recruits receive comprehensive training which includes optional enrolment on apprenticeship schemes, military training and education on the values and standards expected of the UK Armed Forces. This training is designed to develop recruits' abilities and to help build their resilience, providing a foundation for the many and varied challenges everyone faces throughout their life, as well as their future military service. However, the care and welfare of trainees during this period is taken incredibly seriously, with the UK MoD commissioning Ofsted to provide independent assurance that the Armed Forces are providing the appropriate level of care and support for individuals during this period of employment.

The UK Armed Forces take particular care regarding the physical training that all recruits, including personnel under the age of 18, undertake. All recruits must pass a physical training standard to commence training, with physical training upon joining being progressive and designed to develop an individual's capabilities to meet the appropriate standard to continue further trade training. The Joint Service Publication (JSP) 822 "Defence Direction and Guidance for Training and Education" is the authoritative policy that directs and guides the UK Armed Forces to ensure that defence learning (training and education) is appropriate, efficient, effective and, most importantly, safe. This policy covers the design of physical and robust training and directs that designers must consider issues such as musculoskeletal development, climatic concerns such as heat or cold injury, and individual factors such as sickle cell trait.

During training, all recruits, including personnel under the age of 18, will undertake training on the safe use of military weapons. This training is designed to introduce the weapon system, its capabilities, and how to handle the weapon safely, including firing the weapon. Recruits will also be provided with a respirator that is fitted to them individually and tested

¹ Welfare and duty of care in Armed Forces initial training – GOV.UK.

using tear (2-chlorobenzylidene malononitrile (CS)) gas to ensure it will work effectively if required later in their careers. This confidence test follows TUC guidance, and the legal responsibilities, on the importance of personal protective equipment (PPE) for personnel who may work in a chemical, biological, radiological and nuclear (CBRN) environment. The purpose of this confidence test is to reduce the considerable psychological stress that an individual may feel if encountering a CBRN threat for real in the future.

The UK MoD's annual summary of suicides in the Armed Forces, published in 2024, stated that "suicide remains a rare event in the UK Armed Forces", seeing a declining trend in suicide rates since the 1990s, and that suicide rates in the UK Armed Forces were consistently lower than the UK general population. Any death by suicide is a tragedy and in 2023 the UK Armed Forces introduced a Suicide Prevention Strategy and Action Plan to better support its Service personnel. Furthermore, there is no place in the UK Armed Forces for people who display unacceptable sexual behaviour, and we are committed to supporting people who are victims of this. As part of this commitment, we launched the defence strategy on tackling sexual offending in July 2022 and have introduced a zero tolerance policy to unacceptable sexual behaviour.² This includes a zero tolerance for relationships between instructors and trainees. Additionally, the UK MoD has established an independent Defence Serious Crimes Unit, with power to investigate crimes committed across the globe and works to the standards as set down by the UK Home Office and national College of Policing, while also establishing the Victim Witness Care Unit, to support victims and witnesses of crimes within the UK Armed Forces.³

The UK Armed Forces adhere to UK employment law where appropriate to do so. However, like some other employers such as the emergency services and police, the nature of military service means that the UK Armed Forces are exempt from some aspects of the law. All of those in authority owe a duty of care to those under their command. This also includes statutory duties as set out in section 2 of the Health and Safety at Work Act 1974, which states that every employer is to ensure, so far as is reasonably practicable, the health, safety and welfare at work, of all their employees." The vast majority of under 18s within the Armed Forces are found within a training regime, where direction is provided via JSP 822 Training and Education Policy, that states that a "trainee must not spend more than 10 hours undergoing organised training in any 24 hour period." Where specific field-exercises in initial training mean that a trainee will spend more than 10-hours undergoing organized training in any 24-hour period this must be formally recorded alongside associated risks, safety requirements and appropriate mitigation to reduce all to as low as reasonably possible (ALARP) while meeting training outputs.

Recruits under the age of 18 can leave the Service up to the day before their 18th birthday, at which stage they make an informed choice as to whether to remain in service beyond this age. Individuals who decide to leave the Armed Forces are supported for up to two years post discharge to gain a route into further education, training or employment.

The MoD engages regularly with external stakeholders regarding the employment of personnel under the age of 18 and any concerns they have, including the House of Commons Defence Committee, individual Members of Parliament, the Child Rights International Network and the United Nations in relation to their Convention on the Rights of the Child. Furthermore, the UK Armed Forces at the training establishment level engage with local Safeguarding and

² 2022DIN01-073: Zero tolerance of unacceptable sexual behaviour: a victim/survivor-focused approach.

³ Victim Witness Care Unit (VWCU) – GOV.UK.

Children's Partnerships to support trainees under 18, or those who are deemed vulnerable adults.

The UK Armed Forces do not intend to phase out the voluntary recruitment of personnel who are under the age of 18. The Armed Forces provide a positive career choice for all joiners, including those leaving school at 16. Our policies on personnel under the age of 18 in Service are robust and comply with national and international law.