



# **The trafficking of children into and within the UK for benefit fraud purposes**

**October 2010**

**Not Protectively Marked**

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## 1. Introduction

- 1.1 In April 2009, the Child Exploitation and Online Protection (CEOP) Centre produced its annual Strategic Threat Assessment (STA) on the current picture of child trafficking in the UK. This was CEOP's second national assessment on child trafficking and examined intelligence collected from front line law enforcement, children's services and non governmental organisations (NGOs) across the UK between 1 March 2007 and 29 February 2008. It followed on from CEOP's scoping report which looked at intelligence collected in the 22 months prior.<sup>1</sup>
- 1.2 The STA identified a number of key threats and intelligence gaps. It was with this in mind that CEOP decided to create a number of themed assessments covering these trends and gaps in more detail to increase the knowledge of all stakeholders in the child trafficking and child protection arenas.
- 1.3 In particular, it identified a need for more evidence on trafficking for benefit fraud purposes. In the STA only eight of the 325 children potentially trafficked were established as being exploited for the purposes of benefit fraud; however anecdotal information indicated it was a larger problem. It was therefore agreed that a specific assessment to examine the extent of this type of exploitation, the type of benefits being claimed, the profiles of the children and exploiters involved and what impact this exploitation has on the child from a safeguarding point of view would be undertaken. It also aimed to examine the awareness and response of agencies to this type of abuse and identify solutions to reduce this exploitation and help better protect children and young people.
- 1.4 Due to the nature of this report it was established that additional agencies and departments to those approached in the STA would have to be contacted for their specialist remit. These included Her Majesty's Revenue and Customs (HMRC), the Department for Work and Pensions (DWP), local authority housing benefit departments and the National Health Service (NHS) - all of whom provide benefits influenced by and often directly related to the number of children of the claimant.
- 1.5 It was by examining how often these agencies operated in relation to detecting fraud and their awareness of trafficking and safeguarding issues that CEOP was able to investigate if current procedures are sufficient to prevent this exploitation. Coupled with the analysis of intelligence received, CEOP has been able to identify recommendations which could disrupt and reduce this criminal activity and help safeguard children.
- 1.6 The focus of this study is on children who have primarily been trafficked for benefit fraud purposes.
- 1.7 A restricted version of this report is available for law enforcement.

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<sup>1</sup> Both reports 'A Scoping Project on Child Trafficking in the UK' published in June 2007 and the 'Strategic Threat Assessment' published in April 2009 can be accessed via our website: <http://www.ceop.police.uk/publications/research.asp>

## 2. Executive Summary

- 2.1 A total of 19 children potentially trafficked for benefit fraud purposes were identified between 1 April 2008 and 31 March 2009. HMRC and DWP only verify children's existence for financial benefit claims through identity documents, such as birth certificates. For housing benefit, local authorities usually carry out home visits to verify all adults and children on the claim.
- 2.2 The most common nationalities and ethnicities of children identified as being trafficked for benefit fraud purposes were Nigerian, Somali and Romanian Roma. Exploiters were of the same nationality and ethnic background of the children.
- 2.3 The majority of children trafficked were 12 years of age or under. Younger children are likely harder to identify and will be eligible for benefits for a longer time. Most children were trafficked on direct flights from their country of origin by an agent<sup>2</sup>, but also sometimes by their exploiters. In many cases UKBA raised concerns around discrepancies with the sponsors of the children's visas. There were also a number of cases where victims were facilitated on the travel documents of the trafficker's own children.
- 2.4 Fingerprints of children claiming asylum under five are not taken, allowing multiple identities to be registered for a child who is presented to Asylum Screening Units (ASUs) more than once under a new alias each time. Financial and housing benefits can then be claimed for each identity by the parent or guardian.<sup>3</sup>
- 2.5 Children exploited for housing benefits were moved between claimed addresses often in different local authorities and under the care of different adults. There are serious safeguarding concerns around the child in such situations whose interests are not being considered. Different carers and the fact that the child's family life, education and development are being disrupted are serious issues.
- 2.6 The organisation of this crime type varied from an ad hoc approach where children may have been brought in and subsequently exploited by one adult, to large scale organised criminal networks where the hierarchy accumulate funds from the benefit accounts of many claimants.
- 2.7 There is evidence to suggest that children are being trafficked from overseas and entering private fostering relationships with unrelated adults to be used for housing and financial benefits. Private fosterers suspected of trafficking sometimes accommodate large numbers of children, often as a lone guardian. This assessment uncovered evidence that some of these children in private fostering relationships were unhappy and being physically abused.

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<sup>2</sup> Where possible, *e.g.* children from Somalia would fly via another country such as Kenya.

<sup>3</sup> The parent or guardian may be different for each identity.

## Part A – Background Information

### 3. Benefits for children

3.1 The Government provides a whole range of financial supplements, housing assistance and services to persons with children who satisfy certain criteria. Many of these benefits are means tested and adjusted in relation to income and circumstances, or solely relate to the composition of the household and the needs of the children who live with the claimant. These benefits are normally available to parents and guardians who have the right to reside in the UK and many are only available to those on low incomes or those who need specialist financial support. This report only concerns itself with fraudulent and illegitimate benefit claims made using children that allow the exploiter or claimant to make a personal gain. These benefits are:

- **Financial benefits:** these are provided mainly by HMRC and include Child Benefit, Child Tax Credits and Guardians Allowance.<sup>4</sup> These benefits are adjusted if the claimant or child has a disability. DWP also provide benefits which are adjusted if the claimant is a parent, such as Income-based Job Seekers allowance and Income Support<sup>5</sup> or if they care for disabled children (Disability Living Allowance and Carer's Allowance<sup>6</sup>). Presentation of a National Insurance number and evidence of the child's existence through identity documents, such as birth certificate are required to enable most of these benefits.<sup>7</sup>
- **Housing benefits:** this is a means tested financial supplement for the rent of the premises administered and paid by the local authority, which are, in turn, reimbursed centrally by the DWP. As this is a means tested benefit, housing benefit officers from the local authority may complete home visits to verify the occupants are present and are eligible through a series of questions and the production of documentary evidence (see table below). Local authorities also provide housing and the size and quality of housing is influenced by the size and needs of the family applying.

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<sup>4</sup> Guardians allowance is a supplement payment applicable where at least one of the child's parents is dead and the remaining parent cannot take care of the child.

<sup>5</sup> Lone parent over 18 may receive a maximum amount of £65.45 per week compared to a maximum of £51.85 if they were a single adult under 25. The amount received is flat and is not modified according to number of children. Income support is available to lone parents / those caring for someone who is sick (if they have less than £16,000 in savings and work less than 16 hours/wk); the amount received depends on income and circumstances.

<sup>6</sup> Disability living allowance and carers allowance can be claimed subject to physical checks for adults responsible for children with disabilities. These benefits may not be applicable or modified depending on income or if the claimant is in receipt of other benefits. These benefits if given can also grant access to other benefits.

<sup>7</sup> DWP customers have to prove their identity whenever they contact the DWP, this can be to obtain a National Insurance number, making an initial claim to benefit or reporting a change in circumstances. Verification is made through a series of questions and when required, the production of documentary evidence. Foreign nationals will also be required to prove they have recourse to public funds to enable them access to DWP benefits.

Fig.1 Child influenced benefits, eligibility, verification and amounts that can be obtained<sup>8</sup>

<b>Benefit and Provider</b>	<b>Eligibility of Claimant</b>	<b>Verification<sup>9</sup></b>	<b>Amount per child</b>
Child Benefit – HMRC	Child is under 16, 16-20 and in education or training or 16-17 and registered for work or training.	Birth or Adoption certificate of child	Eldest child; £20.30/week Other children: £13.40/week
Child Tax Credits-HMRC	Means tested. Criteria as above. If child is 16/17 must be working less than 24 hours or signed up with careers service, connexions or employment agency.	As above.	Family element: £545/yr Baby element (child <1 year of age): £545/yr Child element: £2300/yr Disabled Child: £5015/yr Severely disabled child: £6110/yr <sup>10</sup>
Guardians Allowance-HMRC	In receipt of Child Benefit. Both parents dead or surviving parent cannot care for child / whereabouts unknown	Birth certificate of child Death certificate of parent(s)	£14.30 per child/ week
Housing Benefit – Local Authority & DWP	Income & Capital below certain level – varies depending on local authority.	Local authority visit property & claimant. Physical check of child. Proof of identity, residency & income.	Size and quality scale according to number of children / disabilities
Child Care	Must work minimum 16 hrs/wk (1 parent if other is in need of care). Child must be placed in registered child care.	As child benefits. Proof of earnings and receipts for childcare.	80% of cost paid directly by claimant up to £175/wk (1 child) and £300/wk (2+children)

## 4. Child exploitation for benefit fraud purposes

### 4.1 What is benefit fraud?

4.1.1 Benefit fraud occurs where money or state assistance is falsely claimed from the Government. As a prosecutable offence benefit fraud would fall under the Fraud Act 2006. Under this Act, fraud is divided into three categories: false representation, failing to disclose information and abuse of position. For an offence to have occurred the subject must have acted dishonestly with the intent of making a gain or inflicting a loss on another. There is also an offence of making dishonest representations for obtaining benefit under section 111A of the Social Security Administration Act, 1992. For Child Tax Credits, an offence of fraud is created independently of the Fraud Act 2006 under section 35 of the Tax Credits Act, 2002.

<sup>8</sup> Accurate as of 6<sup>th</sup> August 2010.

<sup>9</sup> Claimant requires a National Insurance Number.

<sup>10</sup> Maximum amount that can be claimed per element shown. Only one baby element can be claimed per family.

## **4.2 Benefit fraud as a form of child exploitation**

- 4.2.1 It is a common perception that the state is the only victim of benefit fraud, but as some benefits are only given or maintained on the existence of children and the children used form an intrinsic part of the fraud. To qualify as child exploitation, there has to be evidence that the child is being abused by an individual to obtain personal gain.
- 4.2.2 There are many ways a child can be used to obtain benefits. The claimant could be in a non notified private fostering arrangement with a child or false information could be given to enter a notified fostering arrangement with a child and then a subsequent claim made.<sup>11</sup> Exploiters could also give or make children adopt one or more false identities with benefits claimed for each of these identities, sometimes by several different adult claimants. In many cases this may involve the child being moved between addresses and entering the care of different unregistered adults. This alone presents safeguarding risks, but as this study reveals this is not the only detriment suffered by children through this type of exploitation. Cases where children were taken out of school as they were being used for a housing claim in a different local authority were encountered. Evidence was also uncovered of the maltreatment of minors used for benefit fraud, who were treated as commodities not children. Harm to the child is covered in more detail in section eight of this report.

## **4.3 Child trafficking for benefit fraud purposes**

- 4.3.1 This study is concerned with the movement of minors from overseas into the United Kingdom and the movement of minors internally to perpetuate benefit fraud. It is likely that children trafficked into the UK for other types of exploitation may also be claimed for, however this report focuses on children who are trafficked for benefit fraud as the main type of exploitation.
- 4.3.2 There are incidences where children are having financial benefits claimed for them in every European country they have resided in. The claims still continue, even after the child moves on and is claimed for in another country. One example featured a boy in Belgium who was given to the care of an aunt in London. The mother of the boy stated she could not look after the boy as she needed to work to receive child benefits. The aunt however was also claiming child benefits and child tax credits for the child in the United Kingdom. It is difficult to establish if the child is being exploited as the mother may be genuine and the aunt may be taking advantage of the situation.

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<sup>11</sup> It is a possibility that the child may be in such a relationship for reasons other than benefit exploitation, however this would appear less likely where the claimant is caring and receiving benefits for large numbers of unrelated children. Please refer to Section 7.1 for more information.

4.3.3 Children's identities can also be used to enable benefit fraud without the need for an actual child. Many financial benefits only require the claimant to have a National Insurance number with the child's existence only verified by receipt of an identity document such as a birth certificate from their country of origin. In these cases the child is not physically seen. Most cases of fraud therefore involve the creation of false identities and associated false documentation, or the use of genuine documentation for children not present in the UK. There is no need for the child to be present in these cases as the claim is made by post.

## **Part B – Collation of Data**

### **5. Data collection**

#### **5.1 Data request**

- 5.1.1 To obtain an accurate and up to date picture of children who are trafficked for the purposes of benefit fraud, a request for information was sent to the UKBA, HMRC, DWP, NGOs, local authorities and police forces across the UK. Requests for information were sent out in May 2009 for any cases involving the trafficking of children for benefit fraud purposes which occurred between 1 April 2008 and 31 March 2009. The stakeholders have a role in the detection and prevention of child trafficking or benefit fraud in the UK. Requests covered individual cases and also strategic documents of relevance.

#### **5.2 Use of information**

- 5.2.1 To protect children's confidentiality intelligence has only been used for strategic profiling. Where cases are referred to, names and locations have been removed. As stated in the submitted requests for information, intelligence would be shared with the UKHTC as the national repository of intelligence on human trafficking. CEOP would under no circumstances disseminate this information to any other organisations without written consent from the originator unless the handling code permitted<sup>12</sup>.

#### **5.3 Data parameters**

- 5.3.1 Some cases referred to us were not included in the data set for the following reasons:
- the number of children trafficked in the submitted intelligence was unclear; (the minimum number of victims there could possibly have been was used),
  - there was insufficient information given, the case was not deemed a trafficking case or there was no indication of benefit fraud being committed,
  - there was no indication of an actual child being involved. In certain cases a child's identity was used to facilitate benefits without the child actually being exploited.

#### **5.4 Quantitative and qualitative data**

- 5.4.1 Quantitative analysis was conducted, but due to the limited response and often limited amount of detail submitted, biases would have been introduced if victims and offenders were profiled. This study therefore focuses on the qualitative findings of cases and reports received from the data request (supported by quantitative findings where they are deemed useful).

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<sup>12</sup> Whereby intelligence is submitted in a 5x5x5 format.

5.4.2 The following section is divided up into several headings each relating to a distinct type of benefit abuse or profile. There is also a section on harm suffered by the child as a result of exploitation. As discussed in section 4.3, the data had to be thoroughly examined to identify where trafficking for benefit fraud purposes had actually occurred. There were cases where a fraud offence had been committed but the child was not exploited. There were also fraud cases submitted but no children evidenced in the data. These types of cases are discussed in detail in section 6 to enable a better understanding of how they differ from cases in which children are actually being abused to facilitate personal gain. Section 7 then details the core cases where children have been trafficked for benefit fraud purposes.

## Part C – Findings and Discussion

### 6. Benefit fraud committed where children are not directly exploited

#### 6.1 Child identity fraud and theft

- 6.1.1 HMRC and DWP do not automatically physically see children before processing a benefit claim for their parents or guardians; instead they use identity documents to verify their existence. It follows that identity fraud and theft<sup>13</sup> is the most frequently committed crime used to access falsely benefits. Where fraudulent claims are encountered they often involve fraudulent or falsely obtained identification documents – mainly birth certificates, but other documentation such as NHS medical cards have been used.<sup>14</sup> Most of the identities are fictitious and the children do not exist (identity fraud) or are perhaps resident abroad (identity theft).
- 6.1.2 HMRC often identifies fraudulent claims, where the number of children per child care provider is high and the size of the family appears too great for the size of the property. For example in November 2008, 104 claims (from five mobile numbers) to HMRC were made for childcare costs backdating to three months prior (an average of just under £2000 per claim). This related to 219 children at seven child care providers. Checks confirmed that none of these children attended the nursery. The claims were subsequently dropped.<sup>15</sup> It is likely that the children never existed and false identities created to fraudulently obtain funds.
- 6.1.3 A total of 45 child identities which were thought to be being used to obtain financial benefits were provided as a result of our request. These identities related to six cases where the actual involvement of a child could not be established. In some of these instances it appears the identities were made up and therefore identity fraud was being committed. Many media reports list cases where claimants have made up the identities of children to make multiple claims. Examples include a Gambian woman with no children, who claimed more than £20,000 for 18 children and a Scottish father of two who claimed almost £80,000 for 36 children.<sup>16</sup> This type of fraud is a common occurrence HMRC and DWP are faced with.
- 6.1.4 Children may still actually exist, but it may be that only their identity is being exploited.

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<sup>13</sup> Identity fraud is defined as the creation or adoption of a fictitious or false identity to facilitate illegal or fraudulent activity. This usually involves the use of stolen or forged identity documents to obtain goods or services by deception. Identity theft is the misappropriation of the identity of an individual, without their knowledge or consent (the condition of knowledge or consent would not be applicable where children's identities are concerned). These identities are then used to fraudulently obtain services. CIFAS – UK Fraud Prevention Service.

<sup>14</sup> HMRC has a document examination unit which can detect false, forged or manipulated documents. Additionally, staff are alert to inconsistencies such as children having been added to genuine foreign passports but after the date the children entered the UK.

<sup>15</sup> HMRC.

<sup>16</sup> <http://www.independent.co.uk/news/uk/crime/father-of-36-jailed-for-benefit-fraud-82>  
<http://www.dailymail.co.uk/news/article-516126/Gambian-immigrant-pocketed-20-000>.

## **6.2 Non resident adults claiming for their children**

- 6.2.1 For child tax credits and for child benefits it is the adult claimant who must have a right to reside in the UK. The immigration or residence status of the child is immaterial provided the claimant is responsible for that child. Furthermore European Union law (Article 73 Council Regulation (European Economic Commission) 1408/71) permits a European Economic Area national legitimately working in the UK to claim child benefit and child tax credits in respect of one's children living in another member state. In these cases the claim must be supported by a document confirming the family composition and issued by the relevant authorities in the home member state. Those who do not have this right to work in the UK and non resident adults attempting to claim for their children through deception would be committing fraud but would not have to exploit their children to do so.

## **6.3 Facilitation**

- 6.3.1 Many children may have been facilitated into the UK for a better life. Parents may entrust their children into the care of relatives or friends, hoping that the child will receive a better education or have a better quality of life. These relatives or friends may pose as responsible guardians of the child using false documentation and claim benefits for them. Fraud has occurred, but the child has not been brought to the UK for these purposes. As discussed in section 6.1, children do not need to be trafficked into the UK to obtain many financial benefits.

# **7. Benefits obtained through children trafficked to the UK**

## **7.1 Housing benefit fraud**

- 7.1.1 Nineteen children whose circumstances satisfied the parameters laid out in section five were referred to CEOP in response to the data request. The children were identified from a total of five cases.<sup>17</sup> Ten of the children were confirmed<sup>18</sup> or suspected of being trafficked into the country for the purposes of securing both financial and housing benefits the claimants were not legally entitled to. For the remaining nine children, the relevant source agencies indicated their suspicions of trafficking for benefit fraud but the intelligence they provided did not specify how or why they had suspicions.
- 7.1.2 Intelligence relating to another forty five children was submitted but was not included in the quantitative dataset as there was insufficient intelligence to evidence trafficking for benefit fraud (although for some of these there were indicators that this may have occurred). Due to the small numbers of satisfactory cases encountered, cases of

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<sup>17</sup> One of these cases involving two children was an allegation and graded at E4 as an ungraded source and untested intelligence.

<sup>18</sup> As a result of police investigations.

trafficking for benefit fraud that occurred before 1 April 2008 are also referenced in this section<sup>19</sup>.

- 7.1.3 All the cases of fraud identified within this study involved children who were being exploited for housing benefits. This is no surprise as these benefits are usually only upheld after housing benefit officers visit the property to investigate the claim.<sup>20</sup> Officers will check identity and residency documents of all adults and children on the claim (this would include child benefit, tax credits for children and birth certificates of new-borns). If a baby or toddler makes up part of the claim, officers would normally seek to establish their whereabouts if not present. Although officers do not have to physically verify children by sight, they would be alert to indications that children lived there or do not.<sup>21</sup> Claimants are informed of visits, enabling exploiters time to move children into the house. Housing benefit fraud involving trafficked children will consist of either non resident children being used to claim housing benefit through false documentation, or children forced to adopt different identities and used to facilitate multiple claims (only the latter was evidenced in this study). It is probable that children and identities exploited for housing benefits will also be used to obtain financial benefits such as child benefit and tax credits, indeed often these form part of the verification process for the child to help substantiate a claim for housing benefit.
- 7.1.4 There are two distinct methodologies used to obtain housing benefit fraudulently. One is by entering into private fostering arrangements with unrelated children by supplying false information as to their relationship with the child, in order to use the children to obtain better housing accommodation. The other (which is not mutually exclusive of the first method) is the creation of multiple identities for children through false documentation and coercing the child to adopt these identities to facilitate multiple housing.

## **7.2 Private fostering relationships**

- 7.2.1 A private fostering arrangement is where unrelated adults care for a child who, for various reasons do not live with their parents or other direct guardians.<sup>22</sup> By law the carer must notify the local authority before 28 days pass, to ascertain that they meet certain safeguarding criteria and can act as an appropriate guardian. It is understood that private fostering, in the most part, may enable children to be taken care of by other adults who can provide them with a positive environment in which to live. However, there are concerns that exploiters are entering into private fostering

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<sup>19</sup> A total of 24 children derived from cases sent to us as part of the data request and from the STA.

<sup>20</sup> Verification procedures vary depending on the local authority. Some may accept verification of documents through the post, but many conduct visits to the property; the frequency of these visits varies between authorities (some visit all new claims, some visit on review and some prior to payment, visits may then typically occur twice a year or once every two years).

<sup>21</sup> Head of Revenues and Benefits. Tandridge district council.

<sup>22</sup> Working Together to Safeguard Children Who May have Been Trafficked. 2007. Department for Schools, Families and Children – 7.49 'Private fostering is defined in section 66 of the Children Act 1989. A private fostering arrangement arises when a child under 16 years (or under 18 if disabled) is to reside for more than 28 days in the care of someone who is not a parent, close relative, or someone with parental responsibility (these close relatives are defined by the Act as grandparents, brother, sister, uncle or aunt whether of the full blood or half blood or by marriage or civil partnership or step-parent' and 7.50 states 'Parents and private foster carers are required to notify the local authority of a private fostering arrangement. A person who proposes to foster a child privately must notify the appropriate local authority of the proposal at least six weeks before the private fostering arrangement is to begin; or where the private fostering arrangement is to begin within six weeks, immediately'.

arrangements with many unrelated children so that they can claim maximum financial benefits for each child and qualify for better quality local authority housing.

- 7.2.2 In the STA, CEOP raised the issue of private fostering arrangements being misused in order to facilitate the exploitation of children being trafficked into the UK.<sup>23</sup> Once the child is in the UK the exploiter will notify the local authority of the fostering arrangement. The adults are usually of the same ethnic background as that of the child, but cannot prove their stated relationship to them. This may be because proof and identifying documentation may be difficult to obtain depending on the infrastructure of the child's country of origin or because the stated relationship does not exist. As DNA testing only occurs on request when social services feel there is sufficient evidence to raise safeguarding concerns, it is possible for an adult to enter into a notified fostering arrangement with a child who has been trafficked, without the need to evidence their stated relationship.
- 7.2.3 Some of the cases involved children who claimed asylum and then entered into a private fostering arrangement. A child under the age of five could be made to claim asylum multiple times by the exploiter, each time under a different identity and enter a private fostering arrangement under each identity with different carers without being detected on the EURODAC<sup>24</sup> system. Housing and financial benefits could then be sought by each carer using the same child.
- 7.2.4 For example anecdotal intelligence was received of a case where UKBA enforcement officers checked a number of addresses on one street. These were houses given to a number of Somali private foster carers. As the visits continued, officers became suspicious they were seeing the same children that had been resident at earlier addresses. On going back to the houses first checked and enquiring about the location of the children, they were told that they were out playing. What had transpired was that when the officers left the first address, the children of that house also left via a back entrance. They would dress differently, adopt new names and go into different addresses to be checked as different children. In effect, a small number of children were adopting multiple identities and changing locations to facilitate better housing.
- 7.2.5 There were a number of cases featuring Somali children and unrelated guardians where the children were placed into social services due to concerns for their wellbeing. Many did not specify the concerns so could not be included in the dataset. Respondents at ASU Croydon noted that most guardians who accompany a child claiming asylum (with the view to entering a private fostering arrangement) were single Somali females, many of whom were already looking after several children. This corresponds with the majority of cases where Somali children are featured in this report.

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<sup>23</sup> In both non notified and notified private fostering relationships.

<sup>24</sup> EURODAC (European Dactyloscopie) is a system used to record the fingerprints of all over five who claim asylum in the EU, to prevent multiple claims being made.

7.2.6 Not all traffickers will alert the local authority of a private fostering relationship. For example Peace Sandberg, a Nigerian woman bought a baby boy in Nigeria (believed to be for a cost of £150) so she could obtain a council flat in Ealing, London by pretending to be the boy's mother. She obtained a visa for the baby by telling the British High Commission in Abuja that she gave birth to the boy in Nigeria to grant him access to a Nigerian passport. When she arrived in the UK she went straight to the Ealing housing department to submit her claim. However staff had seen her few months earlier and there was no sign she was pregnant, at this point she stated she had actually adopted the baby. Suspicions were aroused and the subsequent criminal investigation by the Metropolitan Police Service's Paladin team resulted in Peace Sandberg receiving a 26 month jail sentence.

### **7.3 Children with multiple identities and methodologies employed by traffickers**

7.3.1 False documentation is one of the two key enablers in obtaining housing benefits by deception, the other being the need to convince housing officers that a claimant(s) reside permanently at the address. As the property may be visited many times during the length of the claim, officers are likely to become suspicious if children who are part of the claim are never seen or there are no indications of children living there. Children may therefore be required to adopt the identity relating to false documentation and appear to be living at the property when checks commence. Sometimes the residences claimed for will be located in different local authorities, to avoid coming across the same housing officers. The following cases encountered always involved children who had at least one other identity, sometimes passed between several adults for their respective individual housing benefit claims or sometimes accompanying the same adult who themselves would adopt a different identity for each property claimed for.

7.3.2 Some of the children were exploited by several family members (sometimes extended) or by members of close knit communities resident at different addresses. It would often appear that one adult or two of the adults would have a more central role in trafficking the child into the UK, accommodating them for a few days before letting other adults collect them<sup>25</sup> and take them away, so they could be used to claim housing benefits. These individuals would often have access to false documentation or use their own child's documentation to bring children into the UK. They may also provide false documentation to facilitate the child's identities.

7.3.3 A Nigerian couple, for example, were alleged to have been trafficking boys and girls aged between six and 12 years of age to an address where other adults would come and take them away to be exploited by using them to claim housing and financial benefits.<sup>26</sup> Another example from February 2008 involved a Somali household composed of a mother, her three boys and another adult female. One of the boys involved had been brought into the UK on the 'mother's son's passport. It was believed that the child was brought in to access better housing and financial benefits.

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<sup>25</sup> There were allegations that children were being sold by these central organisers, but no supporting investigations occurred to support this.

<sup>26</sup> Police Source.

The mother claimed they were all her children, but the older boys stated the youngest boy was not their brother and had only recently arrived. They also stated that lots of boys come to their address to stay for two days and then go elsewhere.

- 7.3.4 Other cases showed a more sophisticated level of organisation where networks had associates working as officials in key positions to enable the criminality. For example, police investigated a Nigerian couple and another associate for claiming benefits for nine children, of which only five have been verified, two being the sons of the husband. Search warrants were executed at several addresses, revealing large quantities of immigration documents. All three admitted complicity in the facilitation of the illegal entry of children and adults, with one male admitting creating false identities and bank accounts. It is believed that employment and housing was provided through associates who were corrupt officials. The children were also being trafficked between London Heathrow and Dublin, where they were being used to obtain housing and benefits in multiple identities. It was believed that the criminals thought it would be easier for the children to enter Ireland and become naturalised, then with EU residency and utilising the common area of travel the child would then enter the UK.
- 7.3.5 One case in the dataset involved a Somali woman who claimed asylum in 2003. Whilst her claim was being processed she obtained a genuine Danish passport in another identity. This passport included the identities of three children and she used this to bring children into the UK under these aliases. She also applied for a home office travel document in yet another identity, so as to open bank accounts in the UK. This resulted in her having three different travel documents. She was associated with three addresses and on investigation more children were discovered to be living there. She was claiming child tax credits, income support, child benefit and housing benefit on two of these identities.
- 7.3.6 Some of the cases above show an organised element with criminals trafficking children and even providing enablers for benefit fraud such as false identity documents for other adults, so that they can claim benefits for the child. There are many intelligence gaps as to whether these children are sold, if so for how much and how the traffickers advertise the availability of these children to potential exploiters.

#### **7.4 Romanian Roma children<sup>27</sup>**

- 7.4.1 On 1 September 2007 the Metropolitan Police Service (MPS) Operation Golf commenced with the aim of examining the presence of a Romanian Roma organised crime network operating in London. The Romanian National Police had identified 1,107 children they suspected had been trafficked out of Romania by this crime network in the four years prior to entry into the European Union.
- 7.4.2 The group is a family based hierarchy originating from Tanderai, Romania that operates in many EU countries. The exploitation of children is key to the acquisition of criminal funds. The children are either family members or have been sold to the

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<sup>27</sup> Interview with Operation Golf detectives on 5<sup>th</sup> May 2009. Operation Golf Summary Report. MPS.

crime group; the latter include Romanian nationals and not just Roma children. These children engage in street crime; pick pocketing, snatch thefts, begging and shop lifting. In the UK it has been identified that maximum benefits are also claimed for these children, with large families living in accommodation provided by the local authority. The majority of these children have not received any formal education or schooling.

- 7.4.3 Before Romania's accession into the EU, an established *modus operandi* (MO) involved families claiming asylum and then being housed by local authorities and obtaining benefits from the HMRC and DWP. They would then present themselves to an asylum screening unit under different identities and be housed under a different local authority and claim financial benefits under the alias. They used false documentation which was obtained through members and contacts of this extensive criminal network. As Romania is now part of the EU, this MO is no longer applicable but as EU nationals it might be possible to present to local authorities under different aliases using false documentation directly.
- 7.4.4 The crime network would use 'mules' to physically carry significant sums of money gained from criminal activities out of the country and back to Romania. One claimant who received benefits for seven children in the 2008/2009 financial year was reported by police to be living in an expensive property in Romania with a £60,000 Audi parked in the drive. It was suspected that most of the birth certificates used were fraudulent.<sup>28</sup> This is by no means an isolated incident, with many network members profiting from the exploitation of children and the benefit systems in the UK and Western Europe.
- 7.4.5 Operation Caddy in January 2008 resulted in the first successful British prosecution for child trafficking. A 13 year old girl was found at an address in Slough and told police at the time that she was very unhappy and wanted to return to Romania. It is alleged that she was trafficked in to the United Kingdom. Five adults, including her father were arrested and subsequently convicted in November 2008. All were convicted of trafficking under section 4(2) of the Asylum and Immigration Act 2004 and of benefit fraud under section 106 of the 1999 Immigration and Asylum act. These five adults received between 30 and 48 months each for trafficking.<sup>29</sup>
- 7.4.6 On 25 April 2009, six adults arrested in Operation Caddy were convicted and sentenced under Section 106 of the 1999 Immigration and Asylum act for dishonest representations to obtain benefit payments (where children had been exploited), having pleaded guilty. They all received a six month custodial sentence despite problems working out the exact amounts that were fraudulently claimed from local authority records.

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<sup>28</sup> HMRC also received information from police regarding Romanian Roma criminals using documentation for fictitious child identities which they used to claim child related benefits.

<sup>29</sup> Whilst Operation Golf and Caddy are good examples of police pro-activity in combating child trafficking, it should be noted that the maximum sentencing for trafficking is 14 years.

## **8. Harm to the child and safeguarding concerns**

### **8.1 Trafficking**

- 8.1.1 This section details the ways in which children were harmed whilst being exploited for benefit fraud from a safeguarding perspective. Most of the children exploited were young in age, making them particularly vulnerable.
- 8.1.2 From the cases received there was no information on the recruitment or abuse of children en route. However many had to adopt different identities, were transferred between several adults and forced to lie to authorities in regard to the relationship with their 'carers'. Some of the cases in the previous section involved houses where children would stay for a few days before other adults would take them away to be exploited for housing benefit claims. The transfer between several unrelated and unknown adults in a new country is a traumatic experience in itself, amplified by the young age of many of these children.

### **8.2 Identity<sup>30</sup>**

- 8.2.1 When talking about impact on the child, it might be useful to discuss the child's development of identity and the negative impact that a false or adopted identity can have on a child. Children who are exploited for benefits may be given false identities or be told by their exploiters to 'role play' for various identities. This can lead to a sense of confusion about their identity which may inhibit the child's normal identity development and have adverse effects on the child's emotional and behavioural progress. This can result in low self esteem and poor self image. It may also cause the child to feel complicit in any crime that is being committed (benefit fraud/immigration) and prevent the child being able to express themselves or to seek help. The child may develop an identity that is intrinsically linked to a sense of criminality, fraud or evasion of the law which may inhibit their moral socialisation. The child may also develop with a sense of invisibility as they may feel that they have to continually suppress their true identity. The child's sense of individuation and social belonging may be poorly developed. If the child has been removed from their culture and /or family, they may not be afforded opportunities to develop a sense of cultural or familial identity.

### **8.3 Attachment, stability and care**

- 8.3.1 Many of the children exploited were not related to the carer<sup>31</sup> or spent time at different addresses under the care of different adults to facilitate housing at multiple addresses.
- 8.3.2 In some cases it appeared the child was spending a substantial time at each address. One example involved a seven year old Somali girl living with an 'aunt' in a private fostering relationship. The child did not attend school one day and a man came in to inform the teachers that the girl's mother had taken her to Kenya, where

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<sup>30</sup> Views given by a children's services social worker from her experience of working with such cases.

<sup>31</sup> Or not the relationship they specified to authorities or that was stated in false documentation.

she would now be living. The aunt confirmed this story. However on further investigation, she was found in another address in the same local authority. Alarminglly the child was returned to her 'aunt' to resume the private fostering relationship.<sup>32</sup> The reason for her movement and the deception of her carer was not established; however the indications are that it could have been to facilitate housing benefit.

- 8.3.3 In such cases the children appear to be treated as a commodity, with their stability and development at risk. It is important that a child has a good bond with at least one carer,<sup>33</sup> but with the child moving between addresses and the care of different adults this attachment may not occur. It is particularly important for children in their early years to develop good attachments. Where children are treated as commodities, it is questionable whether the carer/s will prioritise the developmental needs of the child.
- 8.3.4 Some of the intelligence gathered did not indicate evidence of movement between addresses, but did indicate that sometimes households with one carer were obtaining many unrelated children to acquire better benefits. In one incident dating back to 2007, a Kenyan agent brought a Somali baby boy over to the UK and left him in the custody of an adult Somali female who already had eight children. She was already living in a five bedroom house provided by the local authority and was in receipt of benefits for each of these children.
- 8.3.5 In these incidences it appears that trafficking a child for benefit fraud purposes only becomes viable for personal gain from the allocation of larger local authority housing received for larger families, and the substantial benefits accumulated from claiming for each child. However, if financial benefits were being used for financial gain for the exploiter, then it would be to the detriment of funds that should have been spent on the child, raising safeguarding concerns regarding whether the child was receiving adequate nutrition, clothing and provision for education. With so few carers and so many unrelated children arriving at different stages it would be difficult to attend to the needs of each child.

## **8.4 Education**

- 8.4.1 Children may be taken out of school in one local authority and registered at a new school in a different local authority often under a new identity. By registering an additional claim in another local authority, the same housing benefit officers checking the claim won't be encountered. The child may be moved into a school nearer the new property for convenience, if the stay is to be a lengthy one or taken out of school all together.
- 8.4.2 In February 2006, an investigation by local authority housing officers uncovered a mother who had adopted two identities and had used her five year old son to obtain two flats, so she could illegally sublet one of them. Her child, born in the UK and a

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<sup>32</sup> Case provided by Child Trafficking Advice and Information Line (CTAIL), National Society for the Prevention of Cruelty to Children (NSPCC).

<sup>33</sup> "A Secure Base". John Bowlby. New York Basic Books. 1983.

British national was moved between the two addresses and forced to adopt multiple identities.

- 8.4.3 She had placed a 'right to buy' application for her property in Hackney, London but was residing in a property in Greenwich, London with her son, using different identities for both herself and her son. When a visit was arranged by housing officers to her Hackney address, she stated that it was her cousin who lived in Greenwich who had a son who was born four days apart from her own. She claimed her cousin was in Nigeria doing voluntary work, so the housing officers would not be able to meet them at the same time, to prove they were two different sets of individuals. There were black bin-liners full of clothes in the flat, as if someone had just moved in and a male was present. This male was a tenant who was paying the mother £33 a week, however the mother stated he was a boyfriend who was in the process of moving out. The investigation uncovered that he had in fact just recently moved in and the bin-liners were his yet unpacked belongings. She had therefore been profiting by illegally subletting her second flat that she had obtained through identity fraud.
- 8.4.4 When questioned about her son's education she told the officers that she was schooling the child at home, but could not produce any of his school books. She then stated she was using a private tutor, but could not reveal their details as they were in the UK illegally. On further checks it was established that the child had attended a local school between September 2002 and 5 December 2005, but was removed from 23 January 2006 for non attendance. The child was being made to use a different identity to the one used for housing and was taken out of school at the age of six. The mother is currently in custody awaiting to submit a plea to a number of charges linked to fraud, deception and immigration offences; her child is now in foster care.<sup>34</sup>
- 8.4.5 Another case identified in 2007 involved a ten year old girl of Nigerian ethnicity who was suspected of being internally trafficked for housing benefits. She had multiple identities (at least three established) and was associated with several addresses. She was being picked up after school by a number of different adults. The school stated the child was 'difficult' during lessons and appeared traumatised. When the school questioned her mother about the different adults and the girl's behaviour the mother became evasive and uncooperative. The victim subsequently went missing and was later identified as being registered at a different school under a different name possibly using a false birth certificate. Children's Services, schools and the police were all involved and were concerned that the child had been trafficked; unfortunately the child and her 'mother' went missing again and their whereabouts are not known.
- 8.4.6 The case relating to the Nigerian children aged between six and 12 (section 7.3.3) stated that some of the children who arrive in the UK attend local schools for a short while and then disappear. Another report related to the same children stated they

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<sup>34</sup> Hackney Homes, Hackney Local Authority.

were being exploited for benefit fraud and another report stated they were moved from property to property to live with different adults who they would call 'uncle' or 'aunt', indicating potential housing benefit fraud.

- 8.4.7 In the cases above not only is the education of the child at risk but also their social development and bonds with classmates, teachers and parents or guardians. A police source raised concerns that he believed that many children exploited in this way lacked attachment to society and may turn to violent crime later in life. Treated as a commodity, unable to establish a true sense of family and having their education disrupted, these children are at a developmental disadvantage.

## **8.5 Neglect**

- 8.5.1 Adults who have used children to obtain benefits have demonstrated neglect for the children's health. One children's services social worker spoke to CEOP about one of her cases involving a child being used by various families under different identities to claim benefits. Suspicions arose when the child suffered unusual reactions to routine vaccinations, where it was uncovered that the child was having the same inoculation more than once.
- 8.5.2 A case relating to a number of Afghan boys exploited for their labour in London featured in the STA. These boys were also exploited for benefits. The adult Afghan men who acted as the sponsors of these children during their asylum claim also entered into private fostering relationships with them. Falsified documentation for the boys was used to obtain benefits. The children were moved between multiple residences and between multiple carers. They resided in overcrowded accommodation with adults and other young people that they had no pre-existing relationships with. There was evidence to indicate that the accommodation claimed for via housing benefit was used for purposes other than accommodating children. A neighbour reported concerns about large numbers of men with luggage arriving at the property late at night. One boy was collected from school by different adults all claiming to be the child's father. The school witnessed threats of physical violence against the child. There were several concerns for the boys in relation to safeguarding, neglect of health needs, emotional neglect, pressure on some children to leave education to work full time, and a failure to enrol other children in any education.
- 8.5.3 Likewise there are concerns regarding the overcrowded and often squalid conditions which exploited Romanian Roma children have been found in, with benefit funds being sent back home or controlled by members of the criminal hierarchy rather than being spent on maintaining the well-being of the child (please refer to section 7.4).

## **8.6 Physical abuse**

- 8.6.1 One of the most horrific cases of child abuse recorded in the UK, and the case which prompted enormous concerns over the system of safeguarding children in general was the death of Victoria Climbié who died from sustaining over one hundred injuries. Victoria Climbié was entrusted to the care of an 'aunt' with the hope the child would

receive a brighter future and education in the UK. Her exploiters thought to use her to obtain benefits, but systematically abused and eventually killed her.

- 8.6.2 There were concerns that some of the children featured in this report were being physically abused. In one case neighbours heard the children screaming from being beaten, which resulted in a police investigation into child abuse. The household had been previously known to the police in investigating child cruelty. This in turn led to an investigation into trafficking for benefit fraud<sup>35</sup>.

### **8.7 Sexual abuse<sup>36</sup>**

- 8.7.1 Significant concerns have been raised over the young age many Roma Romanian girls are being married and becoming pregnant within the UK. Fathers of teenage girls will receive a substantial dowry for their daughter from the husband's (who is usually several years older) family. Although primarily a cultural practice there are concerns about the motives behind girls having children at such a young age.
- 8.7.2 The NGO, End Child Prostitution, Child Pornography and the Trafficking of Children (ECPAT) UK produced a report looking into child trafficking in Wales and identified a Roma Romanian family with a large number of children suspected of being trafficked for benefit fraud purposes. Some of the older girls had babies themselves.<sup>37</sup> Operation Golf has similarly identified Roma girls with children, one of whom was trafficked into the UK in 2008 at the age of 13 with her child (the girl had given birth at the age of 11).
- 8.7.3 Children born into the communities connected to the criminal network from Tanderai will have full benefits claimed for.<sup>38</sup> There is no strong evidence to suggest that girls are specifically being impregnated for access to benefits, increasing the financial streams of the networks, as it is a cultural practice for girls to marry when they reach puberty. However, it is established that in the UK most of the network's criminal earnings come through the exploitation of children. The argument that this is cultural practice should not be used as an excuse to prevent children from being sexually exploited,
- 8.7.4 As an insular community, it is unlikely that allegations of abuse will be forthcoming from the girls or from authorities who may have little contact with the families. As this practice directly affects the income of the networks, family members are likely to be complicit. Lack of education, awareness of laws and the protection authorities can provide will likely result in the victim accepting the situation. There is also deep suspicion and mistrust of the police, so family members or the victims are not likely to come forward. As this is largely seen as a cultural practice many of the girls will not see themselves as the victims of exploitation.

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<sup>35</sup> Met Police, Paladin Team

<sup>36</sup> Interview with Operation Golf Police Detective. 5<sup>th</sup> May 2009.

<sup>37</sup> Bordering on Concern. Released April 2009. ECPAT UK.

<sup>38</sup> The children will also be forced to commit street crimes (begging, snatch theft, pick-pocketing, shop lifting, selling fake jewellery etc.) overseen by the network when they are older.

## **9. Awareness and limitations**

- 9.1 The response to the data request from different sectors varied enormously. This may be because of a lack of awareness in identifying trafficking or its relationship to benefit fraud. There appeared to be confusion amongst statutory agencies amongst who has responsibility to investigate such cases. HMRC and DWP do not automatically physically verify the existence of children when processing claims so therefore could only provide a limited response. When housing benefit and fraud units within local authorities were contacted, most were not aware of any cases of children trafficked from overseas or exploited for housing.
- 9.2 When information was given by the local authority it was often highly detailed and provided an insight into the many ways the child's development and stability was affected in addition to details of the exploitation.
- 9.3 A significant amount of data received, identified children who had been facilitated into the UK, but did not specify what fraud was being committed. In this regard names and addresses were disseminated to HMRC (where the handling code permitted) so this information could be obtained. In many cases there was no firm evidence of fraud and child exploitation, these cases were not included in the collective intelligence used for this assessment.
- 9.4 In some cases intelligence indicated that trafficking for benefit fraud may have taken place and further requests for information made. Unfortunately not all these requests were responded to and so these cases could not be used.
- 9.5 Contact with local authorities seemed to indicate limited awareness of trafficked children being exploited for housing benefits. Authorities were alert to indicators such as a child suddenly withdrawing from school although they could not always pin-point the exploitation (for example as in the cases in 8.3.3).

## **10. Conclusion**

- 10.1 The common perception of benefit fraud is that it is an economic crime with the only victim being the state, but as some benefits are only given or maintained on the existence of children, the children used form an intrinsic part of the fraud. An offence of child trafficking occurs, where children are brought into the UK or moved between addresses as a commodity to enable the fraudulent receipt of benefits.
- 10.2 Whereas only proof of a child's identity is necessary to enable financial benefits, housing benefit claims are verified by the local authority visiting the property to check all inhabitants (including children) listed on the claim are living there. Fraudulent claims have resulted in children being treated as a commodity and made to live with different adults under new identities at the new addresses. The child may be placed

in a new school closer to the new address or may be taken out of school altogether.<sup>39</sup> The child's safety, education and social development are therefore being placed at jeopardy. A bond of attachment between guardian and child may not exist. These factors raise serious safeguarding issues, confusion about which adult has parental responsibility and questions as to whether financial benefits obtained using these methods will actually be spent on the child.

- 10.3 The organisation of this crime type varied from an ad hoc approach where children may have been brought in and subsequently exploited by one adult, to large scale organised criminal networks where the hierarchy accumulate funds from the benefit accounts of many claimants.
- 10.4 Intelligence reports and findings from front line professionals who encountered children who underwent this type of exploitation indicate they often appeared traumatised. There was some evidence to suggest that some of these children were mistreated, with parents and guardians neglecting their medical care and there are also allegations of children being beaten. Traditionally Romanian Roma girls enter marriage at a young age with many subsequently becoming pregnant (many who are below the age of consent). This practice is continued in the UK with full benefits being claimed for these children and the possibility that they will be exploited for criminal activities when they are older. Further research needs to be conducted firstly to establish if there are endemic safeguarding concerns and then secondly if this is a cultural tradition, or if there is pressure within the criminal network to increase the population that can be exploited in the above ways.<sup>40</sup>
- 10.5 Many children exploited for benefits are in private fostering relationships with carers taking guardianship of several unrelated children to acquire benefits. From the intelligence identified in this assessment there are substantial concerns relating to unrelated children from Somalia entering private fostering relationships with Somali adults and being exploited for benefits.
- 10.6 In addition to a child, the main enabler for this type of fraud was access to false or fraudulently obtained travel and identity documents. It was established that it is possible to abuse the system and claim asylum with a child whom is aged under five more than once, each time with a different identity and then claim multiple benefits for each of these identities. Despite identifying this weakness, this study only evidenced this was occurring through anecdotal information.
- 10.7 It must be noted that whilst this report has identified many causes of concerns and profiled how children have been exploited, the picture in relation to the full extent and the scale of the problem is still unclear. This lack of awareness has resulted in this crime largely going undetected and operating at an undetermined scale. CEOP alongside other agencies need to help to develop a list of indicators of benefit fraud and raise the awareness of these with front line agencies. Local authorities, schools and the health system equipped with this knowledge need to commit to identifying

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<sup>39</sup> Please refer to section 8.4.1 for explanation

<sup>40</sup> MPS Operation Golf.

children exploited in this way. Local authorities then need to work alongside UKBA in evidencing how processes are being manipulated so that policy can be changed to prevent future abuse of the system. They also need to inform and work alongside local police, who can then investigate these occurrences.

- 10.8 Much can be done to prevent this crime type, by multi-agency partnerships and awareness-raising of trafficking issues. If agencies work together in this way, false identities and illegitimate guardians on claims should be readily identified, preventing and disrupting this type of crime.

## **11. Recommendations**

- 11.1 CEOP alongside other agencies need to help develop a list of indicators for children exploited for benefit fraud and raise the awareness of these with front line agencies. This would lead to an increase in the number of children exploited in this way being identified and safeguarded. Furthermore, this will lead to better detection of this criminality helping bring offenders to account.
- 11.2 HMRC, DWP, UKBA and housing benefit officers need to adopt a multi-agency approach to see if information regarding children and claimants matches with details regarding children and registered guardians held by schools, local authorities and general practitioners. This information can be used to identify children who are being claimed for by adults who are not registered guardians where any practitioner has concerns about the child. Social services will then be able to ensure adequate safeguarding measures are put in place.
- 11.3 A system should be established within the education sector to ensure that when children are taken out of school, they are not taken off the school's records until another school has formally registered them as pupils. Where the child is not registered with another school, s/he may be flagged as either missing from education, possibly indicating identity fraud or other safeguarding concerns.
- 11.4 UKBA to consider using photographs of asylum claimants under five years of age with facial recognition software rather than fingerprints to check against identity fraud in asylum applications.
- 11.5 HMRC, DWP, UKBA and other law enforcement agencies to consider scoping the issue of benefit fraud involving children to further build knowledge.
- 11.6 CEOP to bring all relevant stakeholders together to discuss and reflect on the findings of this report in the form of a seminar.
- 11.7 ACPO to raise awareness of child exploitation through benefit fraud to police forces.