

Accounting Officer Assessment – Independent Child Trafficking Guardianship (ICTG) Service National Rollout (NR) Project

Project Background

The UK has general duties to support victims of modern slavery, including child victims, stemming from domestic and international legal obligations. One way the UK Government meets these obligations to potential child victims of modern slavery is through the Independent Child Trafficking Guardianship (ICTG) Service, which provides modern slavery specific support in England and Wales, as referred to in Section 48 (S.48) of the Modern Slavery Act (MSA) 2015. Though currently only partially commenced, if/when fully commenced, the Secretary of State for the Home Department (SSH) will have one month to rollout the service nationally in England and Wales.

The support provided by ICTGs is in addition to the statutory safeguarding support provided to children by Local Authorities. ICTGs provide specialist advice and support for potentially trafficked and exploited children, irrespective of nationality, and somebody to advocate on their behalf to ensure their best interests are reflected in the decision-making of the public authorities involved in their care. An ICTG's advocacy and involvement throughout the decision-making process is intended to ensure the child is protected from further harm, prevent possible repeat victimisation, re-trafficking or going missing, and promote the child's recovery.

Assessment against Accounting Officer standards

Regularity

The investment does not raise specific regularity concerns. The case sets out expenditure on resources and a standard procurement route. This is within Home Office powers and is similar to existing projects/programmes. As Accounting Officer I am content this meets the required regularity standard.

Propriety

The proposed investment is not novel or contentious and an agreed procurement strategy has been agreed via the Home Office's Investment Committee (InvestCo). I am assured that this procurement strategy will be reviewed and signed-off by the relevant Cabinet Office commercial authorities prior to the launch of the ICTG Service national contract invitation-to-tender (ITT).

Appropriate project governance and assurance is in place to ensure the project is managed effectively. The governance structure includes representatives from various key enablers across the Home Office, for example Public Safety Group (PSG) Commercial, Home Office Analysis and Insight (HOAI) Digital, Data and Technology (DDaT), and PSG Finance. The project, to date, has successfully passed through Commercial Assurance Board (CAB) on two occasions, DDaT Technical Design Authority, Infrastructure and Projects Authority (IPA) Gate 2 independent assurance, and InvestCo. The project will also go through Cabinet Office commercial assurance pre-ITT launch and will revisit all the same assurance gates as part of Full Business Case (FBC) assurance processes.

The project has a clear set of milestones from now until the project transitions into business as usual (BAU). As Accounting Officer I am content that this meets the required propriety standard.

Value for Money

The recommendation options set out in the Outline Business Case (OBC) has a negative Net Present Social Value (NPSV). Monetising the intended benefits of a national ICTG Service is inherently difficult, but there are several non-monetised benefits, and this service supports the UK to fulfil its legal obligations to trafficked and exploited children. As Accounting Officer, I must satisfy myself that these non-monetised benefits mean that this project can be justified as a sound use of public funds and therefore value for money.

The proposed approach meets the strategic objectives set out in the 'case for change' to upscale the ICTG Service from covering two thirds of Local Authorities (LA) in England and Wales to covering all LAs, ensuring that all eligible potential child victims of modern slavery (CVoMS) have access to ICTG support. As evidenced across previous independent evaluations (2019¹, 2020², and 2023³), the ICTG Service will engage with and raise awareness in public authorities, facilitate strong relationships between CVoMS and statutory authorities, improve National Referral Mechanism (NRM) decision-making, and reduce the risk of re-trafficking of CVoMS. These could potentially contribute to a reduced burden on adult support services, higher modern slavery prosecutions rates, and increase modern slavery and human trafficking awareness and expertise in public authorities.

The project's OBC sets out the non-monetisable benefits and highlights that benefits are predominantly social, public-facing benefits for child victims of modern slavery and public authorities, which are difficult to monetise due to several external factors that can also contribute to the identified benefits making attribution difficult. The OBC explains how the Home Office plans to commission an external, independent evaluator to undertake an impact evaluation throughout the contract duration, which will aid the identification of measures and benefits realisation. At FBC stage, there will be a clearer view of benefit measures.

Regarding affordability, I am aware that funding for the 2025/26 Financial Year (FY) will be prioritised within the Public Safety Group allocation following the Spending Review (SR) settlement. Spending in FYs 2026/27, 2027/28 and 2028/29 will form part of the overall bid for phase 2 of the SR for submission in Spring 2025. As Accounting Officer, I am content that this investment meets the required Value for Money standard and am therefore content to proceed at this time.

Feasibility

¹ [An evaluation of Independent Child Trafficking Guardians - early adopter sites: Final report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

² [Assessment of Independent Child Trafficking Guardians – Regional Practice Co-ordinators \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

³ [Independent Child Trafficking Guardian \(ICTG\) MSA evaluation - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

As Accounting Officer, I must be comfortable that the project is deliverable and be cognisant of the overall Amber rating provided by independent reviewers through the Infrastructure and Projects Authority (IPA) Gate 2 Review.

The ICTG Service National Rollout project has a clear governance and assurance structure with a dedicated project/policy (P/P) team and several key enablers from across the Home Office. The project will implement IPA Gate 2 Review critical recommendations, mostly around resourcing and governance, to improve project delivery processes moving forward ahead of FBC stage.

I am content that the commercial route has been approved via the Commercial Assurance Board (CAB) in October 2024 and will not proceed to ITT launch until Cabinet Office commercial colleagues approve the project to proceed to ITT via standard and formal processes. I am aware the programme is one of the first procurements to go to tender using the new procurement regulations introduced in 2024.

I am aware that the deliverability of the ICTG Service itself is feasible and has been in operation via a grant since 2017, expanding from three Local Authority sites to currently two thirds of England and Wales. The ICTG Service is positively regarded across the sector with consistent demands to rollout the service nationally expressed by third sector organisations and parliamentarians. As Accounting Officer I am content that this meets the required feasibility standard.

Conclusion

I have considered this assessment of the ICTG National Rollout (NR) project against the four Accounting Officer standards of regularity, propriety, value for money and feasibility. I am satisfied that the approval of the OBC meets the standards of regularity and propriety set out in Managing Public Money and that this investment meets feasibility and value for money standards.

There remain concerns over the negative NPSV of this investment, but there are clear strategic benefits which are non-monetisable. These provide benefits for child victims of modern slavery, the Home Office's National Referral Mechanism (NRM), and wider public services.

I have prepared this assessment to set out the key points supporting my decision. If any of these factors change materially during the lifetime of this project, I undertake to prepare a revised document, setting out my assessment of those factors.



Simon Ridley

Acting Permanent Secretary and Interim Accounting Officer

3 April 2025