

Dame Rebecca De Souza
Children's Commissioner for
England
Sanctuary Buildings
Great Smith Street
London SW1P 3BT



NNCEE Chair
C/O Pupil Attendance Service
Camden Town Hall
Judd Street
London
WC1H 9JE
Tel: 020 7974 1653
Email: ed.magee@camden.gov.uk

13 April 2023

Dear Dame De Souza,

April is Child Employment Month.

As Chair of the National Network for Child Employment and Entertainment ([NNCEE](https://www.nncee.org.uk)) and on behalf of our 200 plus members I enclose a copy of the letter sent to Nick Gibb the Minister at the Department for Education with responsibility for child employment.

As an organisation and as local authority licensing officers we are concerned that the basis of the legislation we have is now 90 years old and the safeguarding risks for children who are employed.

The Department for Education last issued guidance on child employment when it was the Department for Children School and Families in 2009.

We know that parliamentary time is limited and drafting legislation is time consuming, but we have asked Minister Gibb to consider updating the guidance on child employment to ensure it is fit for the twenty-first century.

The NNCEE would welcome a meeting with you to discuss the concerns raised in more detail and look at aspects of the child entertainment guidance and the approval of chaperones that need updating and how we can work to ensure that children are safe at work.

Yours sincerely,

Ed Magee
Chair National Network for Child Employment and Entertainment

The Rt Hon Nick Gibb MP
Minister of State for Schools
Department for Education
Sanctuary Buildings
Great Smith Street
London SW1P 3BT



NNCEE Chair
C/O Pupil Attendance Service
Camden Town Hall
Judd Street
London
WC1H 9JE
Tel: 020 7974 1653
Email: ed.magee@camden.gov.uk

13 April 2023

Dear Minister Gibb,

April is Child Employment Month.

As Chair of the National Network for Child Employment and Entertainment ([NNCEE](https://www.nncee.org.uk)) and on behalf of our 200 plus members I write to you today to implore that you update the legislation which oversees child employment in England.

The current guidance dates to 13 April 1933; 90 years ago, today.

As an organisation and as local authority licensing officers we are concerned that the basis of the legislation we have is now 90 years old. It was established in the year London Underground unveiled the Harry Beck underground map, John Lewis bought its first store outside London in Nottingham, Battersea Power Station first generated electricity and the Milk Marketing Board was established. BBC radio began broadcasting to the West of England for the first time. Television was in its infancy and consisted of thirty transmission lines and broadcast for a few hours each day. The average wage for a labourer in the engineering field was under a shilling an hour and an unemployment rate of 25% as result of the great depression.

There are numerous aspects of the legislation which the NNCEE and our members believe to be prohibitive or contradictory to the young people of today and the industries/employers where they may work.

Today, under the current legislation, children are unable to work for no more than two-hours on a Sunday as the legislation has not kept pace with Sunday trading. The NNCEE would like children to be able to work on a Saturday or a Sunday but not both days, so they can have some downtime. Employers find the current process to be restrictive and does not fit with their current business hours, resulting in missed opportunities for young people or employers employing them illegally outside of the legislation.

We have so called “industrial undertakings” that are out of step with modern employment practices. A system whereby a head office is based in London, but a child is employed in Lancaster and the London local authority is responsible for issuing the employment permit.

Children can only serve alcohol in sealed containers when part of a meal but can pick up and clear a glass that has alcohol in it on the way to the kitchen.

We have seen an increasing number of requests from Local Authorities about the position of elective home education (EHE) children who are not covered by the guidance and who may be at greater risk of exploitation as well as children missing school to help support their families and not informing schools for fear of losing the small bit of income they get.

In relation to child performance/entertainment we are also concerned about children taking part in theme park entertainment sessions abroad, deemed not for profit, as they are outside the law with no oversight or safeguards in place. Even if they are licensed by the Magistrates Court there is no photograph on the permit issued and there are no checks on who left the country, who they left with and if indeed they ever came back to the UK.

Another area of concern is social influencers who are often children or are used by their parents as part of self-generated content and are outside of current child employment and child performance legislation. They are working many hours to build a fan base that results in greater advertising revenue or free/gifted items from advertisers who have recognised the loophole in the current legislation.

Licences for children taking part in paid sport are virtually non-existent. The current legislation does not count expenses as requiring a licence, but a child could get up to a million pounds in expenses, be out of school for months and no licence is issued by the local authority where they live.

The Department last issued guidance on child employment when it was the Department for Children School and Families in 2009.

We know that parliamentary time is limited and drafting legislation is time consuming, but we would ask that consideration is given to updating the guidance on child employment to ensure it is fit for the twenty-first century.

The NNCEE would welcome a meeting with you and your department to discuss the concerns raised in more detail and look at aspects of the child entertainment guidance and the approval of chaperones that need updating.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ed Magee', written in a cursive style.

Ed Magee
Chair
National Network for Child Employment and Entertainment