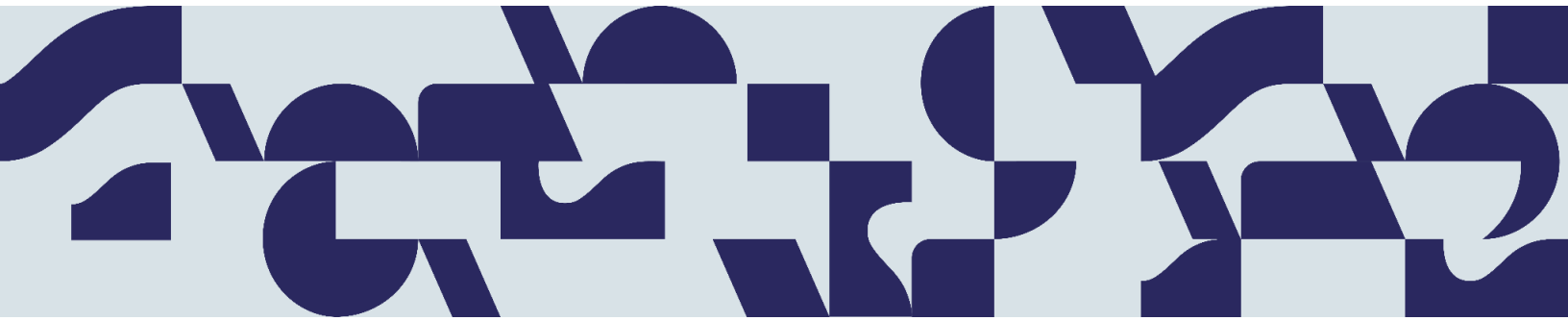




County Lines: Breaking the Cycle

By Joe Caluori, Jess Hull, Beth Mooney and Jessica Lumley

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About Crest Advisory

We are crime and justice specialists – equal parts research, strategy and communication. From police forces to public inquiries, from tech companies to devolved authorities, we believe all these organisations (and more) have their own part to play in building a safer, more secure society. As the UK's only consultancy with this focus, we are as much of a blend as the crime and justice sector itself.

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Trigger warning: This report includes references to drug and alcohol abuse, familial and extra-familial sexual abuse, domestic violence and extra-familial violence which some will find upsetting.

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Foreword by Dame Sara Thornton DBE QPM

The exploitation of children in county lines drug dealing has developed significantly in recent years. Whilst agencies have improved their identification of the victims of these crimes and there has been a significant increase in operations to target offenders it is clear that much more needs to be done. This report by Crest shines a light on the damage done to young lives and the complex challenges to responding effectively and makes a number of thoughtful recommendations.

The criminal justice system is characterised by a binary approach to individuals as either victim or offender. The challenge of county lines drug dealing is that individuals may be found offending but are, in reality, victims. This report illustrates how difficult it can be to make that judgement and the absence of clear guidance for front line staff exacerbates that difficulty. The cases in this study show that identification is improving – and the data on increasing National Referral Mechanism referrals corroborate that. However, the absence of effective safeguarding interventions when victims are identified is concerning. The practical issue of exploitation victims owing hundreds of pounds to unscrupulous criminals is a wicked problem.

The in-depth study of the lives of 13 boys reveals that all had been subject to trauma and damage in their young lives before they were criminally exploited. I was particularly struck by the extent of domestic violence they had experienced and the frequency of serious sexual abuse in their background. The dealers are clearly targeting the vulnerable and there appears to be very few protective factors present. For many years child protection was viewed through the lens of familial harm but in these cases the harm comes largely from outside the family and contextual safeguarding interventions are less developed, viewed as optional in many cases and under-funded. A step change in the system response is required.

In most cases the children were still living with their families, but where that was not the case the quality of care provided by the state was not adequate. The report criticises the 'exile' of children from their neighbourhoods and recommends that children should not be housed more than 20 miles from home. This echoes observations I have often heard from experts who point to the damage done by removing a child away from family, friends and potential guardians.

As a former Anti-Slavery Commissioner it is encouraging that criminal exploitation is being clearly identified as a form of human trafficking this has led to referral into the NRM and consequently lengthy delays in determining whether the child is indeed a victim. The report

calls out this policy failure and I would strongly support the observation. Importantly, the report also points to the solution – local decision-making. This is currently subject to a successful pilot and has resulted in significantly more timely and more assured decision-making by operational agencies. I hope that the evidence in this report creates even greater momentum for the local approach to be introduced across the country.

Lastly, as I read this report I was struck not only by the extreme exploitation in the case studies but also by the dedication of the front line staff doing their very best in difficult situations. The arresting officers who despite much evidence, no disclosure and little time to investigate are endeavouring to do the right thing – to protect vulnerable children and to bring to justice those who exploit them. And the social worker and exploitation specialists who were persevering in supporting severely traumatised children despite the fact that the children were understandably lacking any confidence in professionals.

Dame Sara Thornton DBE QPM is Professor of Practice in Modern Slavery Policy, Rights Lab, University of Nottingham.

Introduction

County lines are characterised by the grooming, exploitation and trafficking of children and young people to deal illegal drugs, predominantly heroin and crack cocaine in locations which are often far from their home areas. Children and young people involved in county lines are increasingly recognised as potential victims of exploitation and trafficking rather than simply as young drug dealers. Nonetheless, having been recognised as potential victims of what is now described as child criminal exploitation ('CCE'), these children and young people often suffer further serious harm.

When children and young people are recognised as potential victims of CCE, the response from their home areas is generally of poor quality leaving victims vulnerable to re-exploitation. Some of these children and young people may groom and exploit others. Young people in this position are often referred to as 'alpha victims' by police officers.

The lack of clear, consistent guidance on how first responders should identify whether or not a young person is a victim of CCE is a significant cause of the ongoing harms and re-exploitation they experience. The lack of robust, effective packages of protection, safeguarding and support for potential victims of CCE in their home areas is also the cause of the harm they suffer. Therefore this report addresses two research questions:

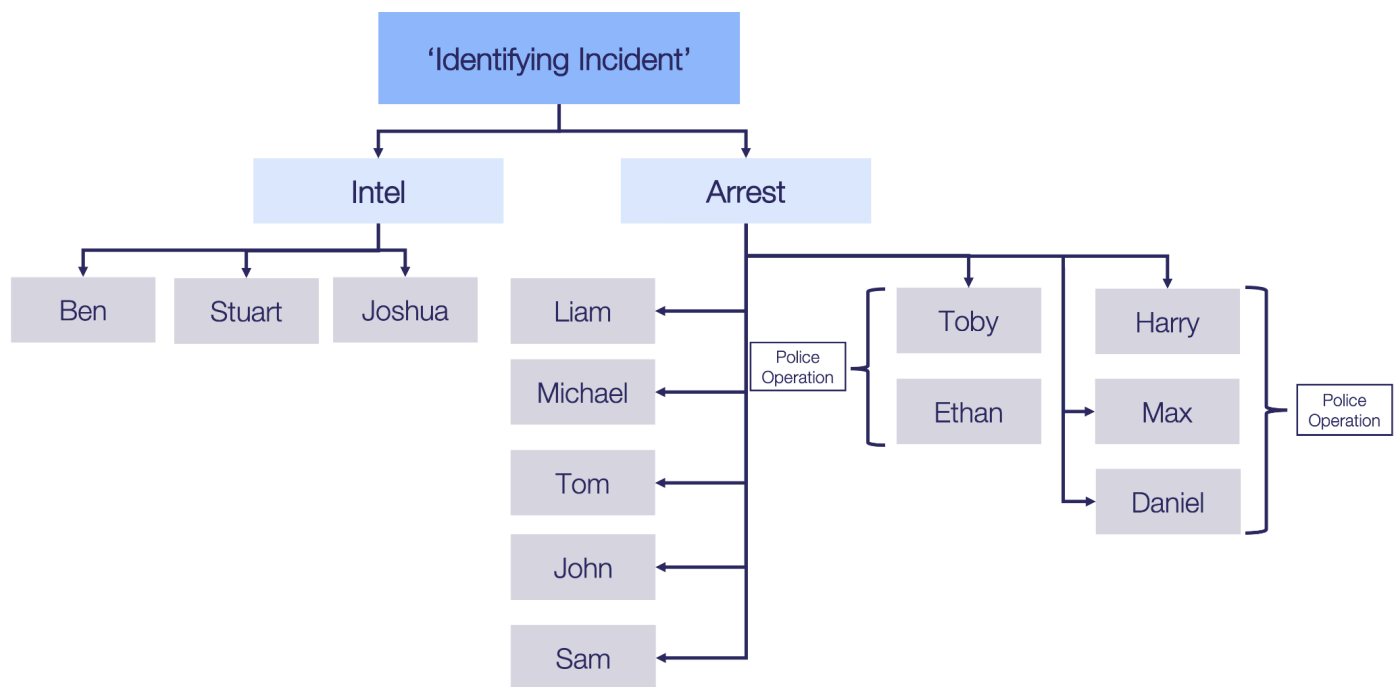
- 1. How should it be decided whether or not children and young people involved in county lines be treated as victims of child criminal exploitation ('CCE')?**
- 2. How should children and young people who are victims of CCE be protected, safeguarded and supported in order to reduce the likelihood of re-exploitation and further harm?**

Our approach

This report explores these questions by studying the lives of 13 children and young people, all of whom were involved in county lines gangs that operated 'dealing bases' in two police forces which are both regarded as 'importers' of county lines. We adopted an innovative approach, accessing data and evidence from both the arresting police force and the home local authority in the case of each young person. This approach has never previously been used to understand children and young people involved in county lines.

The starting point for including each of the 13 children and young people in our sample was a specific ‘identifying incident’. For most, this incident was an arrest for possession with intent to supply (PWITS) Class A drugs. Across the sample, these ‘PWITS’ arrests were variously the result of a specific police operation or a local task force targeting county lines gangs, police officers finding the child or young person at a ‘cuckooed’ address taken over for the purposes of drug dealing (known as a ‘Trap House’ or ‘Bando’) during a routine visit or the culmination of a missing persons enquiry. For three of the young people within our sample, the incident was not a specific arrest, but rather police responding to a disclosure of, or intelligence on, suspected involvement in county lines.

Fig 1. ‘Identifying Incident’ for each young person across the sample



The 13 boys in our sample had all experienced childhood trauma and displayed a range of vulnerabilities before known involvement in county lines, evidenced through contact with statutory services. Over the course of a year, our research undertook an analysis of their pre-existing vulnerabilities, the circumstances of their involvement in county lines and the outcome for them in the criminal justice system.

The authors of this report hope that the insights and recommendations contained within will assist leaders in policing and local government children's services, as well as government ministers and senior civil servants, to improve the national response to county lines and CCE for young people. We believe this report will clarify the role of CCE in county

lines and help local police forces and local authority children's services establish robust and effective responses for children in county lines, breaking the cycle of child criminal exploitation.

Executive summary: key findings and recommendations

Awareness of county lines as a common form of Child Criminal Exploitation ('CCE') emerged in 2015, in the shadow of a series of national Child Sexual Exploitation ('CSE') scandals. The Department for Education¹, took the national lead on CSE, directing local authorities on how to identify, assess and respond to the risks of CSE. Support from the Home Office and painstaking police operations led to the identification of networks of offenders who were prosecuted and punished.

Despite the recent lessons of CSE, in the case of CCE, the DfE ceded the national leadership role to the Home Office. As a result, the national response to county lines has been characterised almost entirely by enforcement rather than prevention and support. This is resulting in waste and inefficiency. Police officers in importing force areas, such as the two police forces in our study, are forced to waste precious hours attempting to discern whether or not vulnerable and traumatised teenagers, trafficked into their area, are victims of exploitation, rather than focusing on identifying and arresting the senior gang members and organised crime groups ('OCGs') who flood their towns with heroin and crack cocaine.

It is the view of the authors of this report, based on our research, that the Department for Education is guilty of a systematic failure to protect criminally exploited vulnerable children from physical and mental abuse, including torture and sexual abuse. This failure is all the more egregious coming as it does in the shadow of prominent CSE scandals in places such as Rotherham and Oxfordshire. This failure can be illustrated by one small example. Despite the vast catalogue of recordable data categories the DfE demands councils report to them, the DfE has never asked children's services at local councils to record or report the number of children who have been criminally exploited in county lines.

This report recommends that teenagers trafficked to deal drugs be returned to their home areas for a crisis intervention. It should be the responsibility of the home police force and local authority to keep these children and young people safe from re-exploitation and harm, freeing police forces in importing areas to focus on working with partner forces to prosecute their exploiter who flood their areas with class A drugs to the full extent of the law.

¹ Known then as the Department for Business innovation, Innovation and Skills

1. Early intervention and prevention should address extra-familial risks

Children and young people in need of additional help and support due to traumatic events and serious problems in their childhood are at heightened risk of being criminally exploited. Our research reveals numerous missed opportunities for agencies to respond to 'red flags' which indicated young people were at risk of CCE.

Key recommendation:

Local authority children's services and their partner agencies should develop approaches to adolescent risk and extra-familial harm which take into account the practice of CCE. For example, young people who spend longer periods missing from home, are more likely to be involved in gangs or carry out crimes with adults. Young people known to go missing frequently and for long periods ought to be considered at heightened risk

2. Arresting police forces are frequently unable to identify potential CCE when children are involved in county lines

Expertise and knowledge is contained within specialist teams dealing with children who are potential victims of CCE. Yet given the level of county lines activity, these capabilities need to become more embedded across public services. Our 13 case studies demonstrate that there is typically an absence of clear evidence or disclosures from young people. Police officers making the arrest (or arrests) in county lines are often forced to rely on gut-reaction, value judgements or instinct based on contextual factors such as the ages of young people, their attitudes and demeanour.

Deciding whether or not children and young people in these circumstances are victims should be tasked to the services from their home area, who know the young person best and interact with them, their parents and carers and other responsible adults those young people interact with most frequently. This might include their Youth Offending Teams worker, their social worker (if they have one), their GP or a teacher from their school and of course, their home police force.

Local Panels should have the resources and responsibilities to provide intensive monitoring of young people. Where young people breach agreements and agreed plans local areas should be empowered to use 'Safeguarding Orders' (see p.55-56), empowering the courts to apply a range of potential sanctions including ankle tags and the use of secure accommodation to deter exploited and protect young people.

Key recommendations:

Updated police training on modern slavery, child trafficking and spotting the signs of child criminal exploitation to help officers handle these cases.

Teenagers 100 days shy of their 18th birthday or younger arrested for a drugs offence linked to county lines should be considered a high-risk safeguarding priority, requiring an urgent, crisis response. They should be returned to their home area for intensive support to minimise the risk of re-exploitation. We have used this cut off point in terms of age because it is aligned with the Home Office pilot scheme localising the Single Competent Authority function (SCA) of the National Referral Mechanism ('NRM')².

The Crown Prosecution Service ('CPS') should work more closely with police forces on cases of suspected CCE, offering 'early advice' to investigators and building a joint case strategy, as they do with rape and serious sexual offences. This closer working relationship should include the youth justice system.

3. Children and young people suspected of being victims of exploitation require urgent crisis support in their local area

The National Referral Mechanism ('NRM'), effectively the diagnostic system for supporting modern slavery victims and those at risk of exploitation, is failing children and young people. It places them in limbo at their time of greatest vulnerability due to unacceptable drift and delay, and decisions which are not based on the best possible information. The localisation pilot run by the Home Office provides a model for new CCE panels, in which senior representatives of relevant agencies from specialist teams jointly protect victims.

Key recommendations:

Local exploitation panels, involving senior specialists from both local authority children's services and the home police force, should have access to 'Safeguarding Orders'; civil orders which enable them to control and protect potential CCE victims whilst also deterring and preventing their exploiters from re-establishing contact. This approach could involve creative use of existing orders, or may require fresh legislation.

²<https://www.gov.uk/government/publications/piloting-devolving-decision-making-for-child-victims-of-modern-slavery/devolving-child-decision-making-pilot-programme-general-guidance-accessible-version>

'Exile' – in which looked-after children are moved away from their home area, has failed victims of CCE. The DfE should trial intensive locally-based alternatives for care placements based i.e. models of 'remand fostering', or systems-based approaches such as the model currently trialled in multiple local authorities by SHiFT³. Given the national shortage of care placements for vulnerable adolescents, this proposal will require upfront investment.

³ <https://shiftuk.org/shift-difference>

Summary of research methods

Research methods

The first stage of research involved a workshop discussion and roundtable event with national and local stakeholders from law enforcement and local government. These events helped the research team to hone the focus of the research, and refine the research questions to address the most important matters for those involved. After that, the research team conducted a limited review of relevant data and literature focused primarily on official publications and recent case law to inform lines of inquiry and subsequent analysis.

Two 'importer' police forces securely shared data on 13 children and young people identified as involved in county lines operating within their respective force areas. For each case, a data template was completed, recording key information from police databases which was shared pseudonymously. The data template was structured around an 'identifying incident' linked to county lines, and covered records from before, during and after the incident. The police shared the identity of the child or young person with their home local authority, who were asked to complete a separate data template outlining social care involvement, as well as any data held on their education or housing (where available). Once completed, local authorities reapplied the pseudonymous codes assigned by the arresting police force before submitting the data templates to Crest, under a data sharing agreement. Crest then reconciled the two 'halves' of each data template.

Crest did not request any specific demographic criteria for the young people selected by the two police forces. However, all the young people selected by the police forces were male. Based on police assigned IC codes, eight of the young people in the sample were White, three were Black and two were Asian. It is important to note that police assigned codes represent the apparent ethnicity of an individual, and are not necessarily how an individual would self-identify. To protect the anonymity of the young people in the sample, the ethnicity of each individual is not specified.

With the data received and matched, police officers and local authority practitioners familiar with the cases were interviewed by Crest researchers to provide a full understanding of the lives of the boys prior to, during, and after the identifying incident – and to ensure that the data was considered in context. These cases are referenced throughout the body of the report, and are separately written up as case-studies which are collected in an accompanying document. The document, [Breaking the Cycle: Case](#)

[Studies](#), can be found on the project page for this research on the Crest Advisory website. All names used in the case studies are pseudonyms.

Please see **Appendix 1** for further detail on research methods.

Why did we take this approach?

There is a growing body of research on the county lines phenomena. A range of academic papers and research published by third sector organisations offer invaluable insights into the subjective experiences of children, families and practitioners largely obtained through qualitative research methods. Official reports from within the Government include ‘It was hard to escape’⁴, a landmark review of 21 cases by the Child Safeguarding Practice Review Panel (2020) focused on local authority responses, and ‘Both sides of the coin’⁵, a highly detailed inspection report by HMICFRS, focused on the response of law enforcement agencies.

The intention of the research methods we selected contribute a new perspective, doing something which we believe has never been done before, bringing together insights from both the arresting police force and the responsible local authority children’s services through pseudonymously matched case-level data. This research explores a whole-system response, shining a light on internal inconsistencies within agencies as well as tensions between them.

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/870035/Safeguarding_children_at_risk_from_criminal_exploitation_review.pdf

⁵ <https://www.justiceinspectorates.gov.uk/hmicfrs/publications/both-sides-of-the-coin-county-lines/>

Chapter 1: The evolving response to child criminal exploitation

The Home Office's 2018 Serious Violence Strategy presented a working definition of Child Criminal Exploitation (CCE), describing it as:

“Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence”.

“The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology”.

Identifying the involvement of children in county lines, potentially as the result of exploitation, indicated a significant change in Government policy. In Chapter 1, this change in policy is considered and charted through the official national response to county lines.

The Government response to child criminal exploitation in county lines

Before the publication of the National Crime Agency's (NCA) 2015 county lines intelligence assessment, the 'county lines' phenomena was not well understood within policing, children's social care or the wider criminal justice system, or within society as a whole.

Where police forces lacked a nuanced understanding of the county lines model, young people who were potential victims of CCE often received an enforcement response and limited safeguarding – charged and then bailed for a drugs offence and returned to their home area. On other occasions, well-intended police responses inadvertently created risks. For instance, where police suspected exploitation, but regarded drugs charges as disproportionate, charges might be dropped on the grounds of a lack of public interest; and young people de-arrested and released. Yet often, the young person would then carry a debt to the county line operator in drugs or money lost. They would usually be required to 'work off' this debt through free labour, as modern day slaves, or face violent retribution against themselves, friends and close family members.

The first NCA County Lines Intelligence Assessment 2015⁶ was presented a complex account of the role of exploitation, arguing that “some children may be willing to take part in county lines and do not consider themselves victims of exploitation, particularly when they believe they will be rewarded with large sums of money or higher status in the group” before noting that “most returns indicated children received little or no money with many practitioners describing even willing children as being groomed.” In contrast, the same report presented adults whose properties had been ‘cuckooed’ by gangs unambiguously as victims.

A year later the language used by the NCA had changed dramatically. Their 2016 report stated that: “County Lines gangs pose a significant threat to vulnerable adults and children upon whom they rely to conduct and/or facilitate this criminality”. Subsequent county lines threat assessments published by the NCA in 2017 and 2018 provided further evidence from police forces on the role of grooming and exploitation of children in county lines.

The Home Office’s ‘Ending Gang and Youth Violence’ (EGYV) programme briefly became the ‘Ending Gang Violence and Exploitation programme’. In 2017, the Home Office published guidance encouraging police forces and other ‘first responders’ to use the ‘National Referral Mechanism’ (‘NRM’) for children in suspected of exploitation in county lines, explicitly recognising them as potential victims of exploitation and trafficking under the provisions of the Modern Slavery Act (2015). Encouragement to use recently published modern slavery legislation and the NRM to protect victims and punish perpetrators was reiterated in the Home Office’s 2018 ‘Serious Violence Strategy’⁷ launched by previous Home Secretary Rt Hon Amber Rudd MP. This report contained the Home Office’s first ‘County Lines Action Plan (Parts 1 & 2)’, which took the form of a six page, 1,500 word annexe to the main report. The most significant measure included within the strategy regarding county lines, announced the further development of the National County Lines Coordination Centre (‘NCLCC’).

⁶<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/359-nca-intelligence-assessment-county-lines-gangs-and-safeguarding-2015/file>

⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698009/serious-violence-strategy.pdf

This chapter focuses on the two main planks of the Government's proposed response to identifying and protecting potential victims of child criminal exploitation:

- (i) The use of **Section 45 of the Modern Slavery Act (2015)** and;
- (ii) Encouragement to use the **National Referral Mechanism ('NRM')**, introduced in 2009 to meet the UK's obligations under the Council of Europe Convention on Human Trafficking.

The Modern Slavery Act (2015)

Section 45 of the Modern Slavery (2015) Act, which covers England and Wales, provides separate defences for adult and child victims of trafficking. It can therefore be applied to children exploited by county lines gangs. For those under the age of 18 at the time of the incident, section 45(4) permits the defence to be used where it can be shown that:

- (a) "The person commits the act as a direct consequence of their being, or having been, a victim of slavery; and
- (b) A reasonable person in the same situation as the person and having the person's relevant characteristics would do that act"

Contrary to some assumptions, even if an offender has been exploited, section 45 does not apply to offences other than those covering drugs offences. For example, sexual offences and other violent offences are exempted from section 45.

Where the Section 45 defence is successfully applied, an individual is not guilty of the drugs offence. Our criminal justice system still allows for under 18s to be prosecuted for drug offences, if it can be shown that the young person willingly entered into association with others in the knowledge that involvement in these offences was a possible outcome⁸. When it is decided there are reasonable grounds that a young person may be a victim of exploitation, the National Referral Mechanism is used to reach a judgement on conclusive grounds, on the balance of probability.

⁸ <https://www.cps.gov.uk/legal-guidance/modern-slavery-human-trafficking-and-smuggling>

Section 45: The county lines defence?

Police forces have long argued that treating all children involved in county lines as victims provides a perverse incentive for criminal gangs to exploit younger children. This is because police forces believe that criminal gangs involved in drug supply are known to groom children and young people by telling children they will escape criminal consequences even if they are arrested due to their young age, lowering the bar to participation in drug dealing. Gangs are able to do this in the knowledge that if arrested, a child or young person will be returned to their exploiters to work off a debt for lost drugs or cash.

Following a dramatic increase in use of 'Section 45 defence' and concerns about potential abuses, former Independent Anti-Slavery Commissioner Dame Sara Thornton DBE QPM launched a call for evidence⁹, in the absence of any centrally collected data. Her report based on evidence from agencies within the criminal justice system cited evidence of numerous abuses of Section 45 of the Modern Slavery Act (2015), finding that the defence was being used late on in the process by defence counsel leading to the abandonment of trials. However, the report also highlighted that the possibility of exploitation was often not investigated by police, and protections and safeguards for victims who had been exploited were inadequate.

The National Referral Mechanism (NRM)

By 2018, government policy on county lines had started to recognise that children and young people involved in county lines were often victims of exploitation, trafficking and modern slavery. Professionals encountering young people involved in county lines – often social workers and police officers – were encouraged to use the NRM as part of a safeguarding response.

For those referred to the NRM, the Single Competent Authority ('SCA') within the Home Office makes an initial assessment as to whether a child or young person is a potential victim of modern slavery. This is called a 'reasonable grounds' decision. Where a positive reasonable grounds decision is made, the individual qualifies for a reflection and recovery period lasting 'at least' 45 days until the SCA makes a 'conclusive grounds' decision. The NRM is the only diagnostic national tool at the disposal of the agencies considered in our report, yet the responses from police officers, social worker and youth offending workers interviewed for this research demonstrated widespread confusion around the purpose and

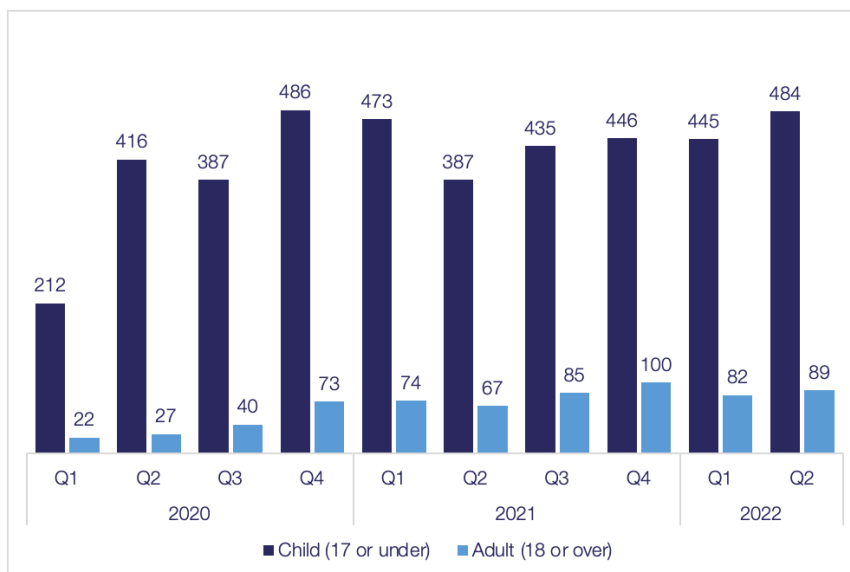
⁹ <https://www.iicsa.org.uk/key-documents/23310/view/HOM003396.pdf>

appropriate use of the NRM. As our research for this report – and our long-read on the NRM ‘No Right Move’ – illustrates, early uses of the NRM were based on a common misunderstanding of its role, in particular the false belief that if offered support of any nature for victims¹⁰.

The NRM was introduced in 2009 to meet the UK’s obligations under the Council of Europe Convention on Human Trafficking. However, the NRM was designed and intended for victims born outside the UK. The decision-making process is lengthy and subject to significant drift and delay, often informed by poor quality and outdated information. In the first quarter of 2022, the Home Office reported the average median wait time from a reasonable grounds to a conclusive grounds judgement was 448 days, up slightly from 440 days for the first quarter of 2021¹¹.

A new ‘criminal exploitation’ category, added in the last quarter of 2019, immediately made up nearly half of all child referrals. According to the National Crime Agency, ‘exploitation in county lines drugs supply remains the most frequently identified form of coerced criminality, with children representing the vast majority of victims’¹².

Fig 2: NRM cases with a county lines flag; those aged under 18 and those aged 18 and over



Source: Home Office, NRM Data return Q2, 2022

¹⁰

<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>

¹¹

<https://www.gov.uk/government/statistics/national-referral-mechanism-and-duty-to-notify-statistics-uk-april-to-june-2022>

¹² National Crime Agency (2020), *National Strategic Assessment of Serious and Organised Crime*, p. 24;

Experiences of the NRM for the 13 boys

Encouragingly, an NRM referral was submitted in relation to the county lines incidents examined here in all but three cases. A police officer explained, “There’s certainly a lack of knowledge around the NRM process within the force without a shadow of a doubt”. He said this had improved recently but only as a result of a newly-appointed practice manager in the local authority’s exploitation team, who was determined to establish a consistent process.

Although practitioners submitted NRM referrals in most cases, often they were not clear on the intended purpose or benefit of making a referral. In some cases, social workers appeared to submit NRM referrals simply because they were mentioned as a stage on safeguarding checklists.

“We found a lot of social workers, as soon as somebody was arrested, were submitting to the NRM. It was not particularly for mitigation, they weren't thinking that far ahead – It was on their checklist of safeguard measures to complete”.

- Police officer

A number of police officers told us they only submitted NRM referrals in cases where there was clear evidence of exploitation, not just suspicion as the guidance suggests above.

“By the time **Tom** came through, we didn't put [an NRM through] at the time because, like I said, at the time we only suspected exploited because of his age, but he might not be [exploited]. So we held off on the NRM. And then that would have been done late into the investigation, once phones were downloaded.”

- Police officer

It was unclear whether a positive NRM outcome expired, in terms of its bearing on a young person’s ongoing involvement in county lines. One police officer expressed frustration that in their view, a positive NRM outcome never expires. However, in our sample, an ongoing or previous NRM referral was not seen as relevant to the incident in question. When **Daniel** was arrested, the police were aware he had received a positive NRM referral a number of years before. They, along with the judge who decided to remand him in custody, felt his offending had escalated to a point where the original conclusive grounds decision was no longer relevant. Two NRM referrals were made for **Joshua** in the space of three months (the outcome of these referrals is unknown). **Tom** had an open NRM reasonable grounds application which was awaiting a conclusive grounds judgement at the time of his identifying incident (an arrest for PWITS) but was still charged.

Challenges use of section 45 and the NRM from case law

Given the problems in the use of the NRM within our 13 case studies and abuses of the section 45 defence identified by the Office of the Independent Anti-Slavery Commissioner, it is unsurprising that cases have been challenged the use of both section 45 of the Modern Slavery Act (2015) as a defence and the validity of the NRM as a evidence of CCE.

In *R v MK and Gega* [2018]¹³, the Court of Appeal addressed whom the burden of proof falls upon when a defendant claims to have been trafficked. Should it be the defendant or the prosecution? It was concluded that expecting victims to prove the components of their defence would compromise the intended purpose of section 45, to provide protection to victims from criminalisation. As a result, individuals wishing to use the section 45 defence needed only point to evidence they were compelled to act out of exploitation. They did not need to prove this beyond reasonable doubt.

It took until 2020 for the courts to consider the validity of NRM decisions in relation to criminal proceedings. When a defendant relies on the section 45 defence in court, a recurring issue is whether conclusive grounds decision by the SCA is admissible as evidence at trial that the defendant is a victim of exploitation.

In the case of *DPP v M* [2020], the victim in question was a 15-year-old boy (M) found in possession of a bladed article and class A drugs (cocaine). On appeal from the Youth Court, this case provided clarification that a positive conclusive grounds decision by the SCA could be admissible evidence in a criminal trial to demonstrate the act occurred by exploitation. The defence lawyer instructing M in this case stated that:

“Depriving the court of the SCA decision would have severely reduced the evidence on which to make this decision”.

However, a year later, the judgement was, in effect, reversed by *R v Breani*¹⁴ [2021]. With similar case details to *DPP v M* [2020], a seventeen year-old boy was charged with conspiracy to supply cocaine. On appeal, the Lord Chief Justice disagreed with the previous decision in *DPP v M*, on the basis that the SCA are ‘not experts in human trafficking and modern day slavery’. Therefore, a positive conclusive grounds decision by the SCA is not admissible in a criminal trial. It should be noted though that the case of *VCL*

¹³https://www.researchgate.net/publication/327243774_Court_of_Appeal_Burden_of_Proof_in_Trafficking_and_Modern_Slavery_Cases_R_v_MK_R_v_Gega_2018_Crim_667

¹⁴ <https://www.judiciary.uk/wp-content/uploads/2021/06/R-v-Kevin-Breani.pdf>

and AN¹⁵ sets a high bar for prosecution to take place despite a positive conclusive grounds decision.

In the case of VCL and AN v UK, The European Court of Human Rights ('ECHR') unanimously found that the British authorities failed to uphold their obligations under Article 4, by failing to refer the children to a competent authority for an identification assessment despite credible signs of trafficking, and by continuing to prosecute them despite a subsequent formal and lawful identification by the Home Office that they were child victims of trafficking. The Court also found a breach of fair trial guarantees through the UK's failure to identify the children as being potential trafficking victims at the time of their detection. The Court found that this therefore affected the overall fairness of their trials and may have prevented them from securing important evidence that could have supported their defence.

This ruling questions what evidence is available to consider the victim status of those exploited in county lines drug dealing? Together with a 'no comment' interview from the victim, as in the case of M, available evidence may be very limited – as set out in Chapter 4 of our report, which focuses in detail on how police dealt with the 13 children and young people in the sample. The Modern Slavery Act (2015) plays an essential role in avoiding unnecessary and harmful criminalisation of young people wrapped up in criminal exploitation and county lines.

When a potential victim of exploitation is referred to the NRM, caseworkers of the SCA come to a decision on victim status based on a picture presented by agencies. These agencies might include local authorities, YOTs and the Police. However, this decision is not deemed as admissible evidence nor does it bind the court to decriminalise a potential victim. Even with a positive 'conclusive grounds' decision, a young person may still be prosecuted. Without a conclusive grounds decision, the courts are left with no official diagnostic tool, leaving them with limited evidence to draw upon.

Young people who are arrested in relation to county lines drug dealing but are suspected to be a victim of CCE are required to be referred to the NRM. If they receive a reasonable grounds decision that they are a victim, their case for offences associated with that 'identifying incident' should not take place until a conclusive grounds judgement has been reached. Even then, if the SCA judgement is positive, the individual may still be prosecuted because the SCA's assessment is not deemed to amount to expert evidence.

¹⁵ <https://www.kcl.ac.uk/news/kings-professor-wins-landmark-judgement>

The NRM localisation pilot

The current default use of the NRM for children exploited in county lines is characterised by myriad failures. Interminable waits for conclusive grounds outcomes place children and young people's lives on hold, providing a window of opportunity for their exploiters to threaten and re-exploit them. The regional Home Office SCA staff are forced to reach judgments based upon appallingly poor and often extremely out-of-date information. Professionals do not believe the NRM has any real protective value for young people beyond potentially ending court cases or reducing sentences – and, since *R v Breani*, the courts are able to ignore conclusive grounds judgments entirely.

In our 2020 report, 'County Lines and Looked After Children',¹⁶ Crest Advisory echoed calls from Dame Sara Thornton DBE QPM and ECPAT (Every Child Protected Against Trafficking) UK for NRM processes affecting children to be conducted locally. We recommended that for suspected child victims, the SCA function should be transferred from the Home Office to the local authority in which the referral was initially made, or to where the child lives. The objective was to compel agencies to take responsibility for criminally exploited children, rather than attempting to transfer responsibility elsewhere.

The Home Office launched a limited pilot in ten areas under which a panel of local agencies would take on the SCA function for children. Our in-depth study examining the Islington and Camden pilot revealed early successes. Localisation appears to offer the answer. In Chapter 4 of this report, we consider how extending the localisation pilot could lead to better and more timely decision-making and the possible creation of local multi-agency CCE panels.

Findings and recommendations

There is broad agreement that children and young people involved in county lines are often victims of exploitation. But there is no consensus view or approach on how to determine who are the victims and who are willing participants or groomers. The two main procedural planks of the national response to child criminal exploitation in county lines are section 45 of the Modern Slavery Act (2015) and the NRM have been compromised through their poor use, abuse and poor administration.

¹⁶

<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>

As our case audits and interviews with police officers and practitioners reveal, there is little faith in the positive impact of the NRM, and the process is still poorly understood by many. Retrofitting the NRM as an emergency measure for CCE potential victims in response to the county lines crisis in 2018 may have been an appropriate ‘patch’, but urgent reform is clearly needed.

Key findings	Recommendations
<ul style="list-style-type: none"> ❖ The NRM is not functioning effectively as a diagnostic or safeguarding tool for CCE. Extensive delays and poor information increase the vulnerability of victims. ❖ The NRM is poorly understood by professionals who often view it as a cumbersome ‘tick box’ exercise or a ‘get out of jail free’ card. 	<ul style="list-style-type: none"> → The Single Competent Authority (SCA) function of the NRM should be moved from the Home Office to local areas, for all cases which are flagged as involving county lines. This will speed up and improve decision making.
<ul style="list-style-type: none"> ❖ There is no official diagnostic tool for CCE accepted as expert evidence by the courts, following the judgement in R v Breani 	<ul style="list-style-type: none"> → Senior judges and officials should set out detailed standards under which local SCA decisions meet the threshold of expert evidence used in court. This may require a Court of Appeal judgement.

Chapter 2: Trauma, vulnerability and county lines

Children in need of additional help and support represent a small proportion of the wider population, but comprise the majority of children involved in county lines. Analysis of the 13 cases in our research suggests that there is a pattern. Children and young people who have grown up around or experienced violence and abuse can normalise that behaviour in their everyday lives and place themselves in situations where an offender can exploit them. Even when they are arrested and confronted with the evidence of exploitation or abuse they may still feel that this abuse and degradation is simply 'part of the game', conducted within a set rules which are understood by those who participate. Sometimes vulnerabilities are not obvious or known but gangs have proven adept, perhaps more so than local authorities, at identifying vulnerability.

In this chapter we discuss common vulnerabilities, experiences and patterns of exploitation that have been recorded before each identifying incident. We consider how these common vulnerabilities coincide with 'contextual risks' – potentially harmful events and factors in the environment, outside the home. Some of these risk factors were flagged by police or local authorities at the time they occurred; the potential significance of others was only recognised in hindsight.

Our findings point towards ways in which CCE could be prevented and disrupted by developing approaches to vulnerable young people which recognise and respond to indicators of risk, enabling an earlier intervention.

Figure 3 sets out the features in each young person's life which made them vulnerable before their county lines involvement (the 'identifying incident'). This information is based on data from police and local authorities, as well as interviews with practitioners. The most common vulnerabilities are highlighted in red. Where a box is not marked, it does not necessarily mean that the vulnerability was not present, only that it was not recorded. This is likely to be the case with mental health concerns, which are not flagged in half of the sample; this is perhaps surprising, given the range of other risk factors present which might affect someone's mental health.

Fig 3. Vulnerabilities across the sample prior to the 'identifying incident'

	Ben	Sam	Toby	Ethan	Stuart	Max	Harry	Daniel	Tom	John	Liam	Joshua	Michael
Domestic Abuse	x		x	x	x	x	x	x		x		x	x
Sexual abuse / assault concerns	x	x											
Substance Misuse	x	x	x	x	x	x	x	x	x	x	x	x	x
Mental health concerns	x	x		x			x			x			
School exclusions	x		x		x					x	x	x	x
Care experienced				x	x		x	x		x			
Reported missing	x	x	x	x	x	x	*	*	x	x	x	x	x
Gang involvement	x				x	x	x	x		x	x	x	x
Offending behaviour	x	x		x	x	x	x	x	x	x	x	x	x
Victim of crime	x				x		x	x		x	x	x	x

*The data returns for Harry and Daniel flagged that information on reported missing episodes was unknown.

The 'identifying incidents' that act as the focal points for this research typically occurred when the boys were 15 or 16. The table above shows that substance misuse, domestic abuse, missing episodes and previous offending behaviour all featured prominently in their lives before that.

Familial abuse and neglect

Most of the young people in the research sample had difficult, often abusive, relationships with family members. For many, the family home was not a safe and supportive environment, meaning that needs were unmet and individual vulnerabilities were exacerbated. As a result, validation or a sense of belonging was sought outside the family home, through harmful associations in the community.

Domestic abuse and domestic violence

The prevalence of domestic abuse as a feature of the young people's early lives is striking. In almost all cases, domestic abuse is referenced explicitly by the practitioners involved in these cases. Frequently, domestic abuse between parents is witnessed by the young person from a young age, sometimes abuse is perpetrated against the young person, and sometimes the young person is implicated in perpetrating abuse against their parents. In both **Toby** and **Ben's** cases, their social worker recognised that domestic abuse perpetrated by the young person against parents was a learned behaviour, a result of witnessing extensive domestic violence from a young age.

"I think that [Toby and] the older children mirrored a lot of what they've witnessed from dad towards mum, they would rebel a lot, and you know, not respect her."

- Social worker

"Witnessing domestic violence between [Ben's] parents, it was an ongoing issue. [...] I think there were a lack of boundaries as a child as well, there were no good boundaries and guidance from parents, which, you know, led to him assaulting them and or, you know, copying what he'd seen his dad do to his mum"

- Social worker

Ben's family was well-known to social care. An assessment conducted when Ben was four years old related to an allegation that his older sibling had sexually assaulted him. It was felt that this trauma affected Ben's behaviour at home and the way he interacted with children at school. However, it is not known if Ben ever received any therapeutic support as a result of the assault.

"It brought a lot of anger in the family home [...] an inability to manage [Ben's] behaviour, exhibiting sexualised behaviour with other children at school"

- Social worker

Sometimes sexual abuse went unreported at the time it occurred. That was the case for **John**, who disclosed that he'd experienced sexual abuse as a young child. He told a specialist exploitation worker that he had experienced flashbacks and nightmares.

There were other indications that the young people in the sample may have experienced non-recent sexual abuse. But practitioners did not reference the incidents explicitly and it is unclear whether any support was delivered to the young people as a result. For instance, concerns were raised that, aged 14, **Harry** was groomed by an adult woman with whom

he thought he was in a relationship. **Sam** exhibited sexualised behaviour at the age of 12, which prompted social care staff to question whether he had been sexually exploited. However, the detail and outcome of this query is unknown; it did not feature in the direct work delivered to Sam following his known involvement in county lines.

The siloed and implausibly gendered nature of CCE and CSE work by both police forces and local authorities allows recorded instances such as these to pass without the scrutiny they might deserve. Boys are unlikely to disclose that they are potentially victims of sexual exploitation despite evidence¹⁷ that this is the case. This issue is especially pertinent where there are concerns that drugs have been inserted (known as ‘plugging’).

Lack of guardianship

Where there was instability in the family home, parental substance misuse, involvement in criminal activity or neglect, young people tended to lack boundaries. Consequently, incidents when they went missing might go unreported and harmful associations unchallenged.

Violence incidents were not uncommon in **Joshua’s** family home. Some of his family members were involved in crime and Joshua would demand money from his mother, threatening repercussions if she didn’t hand it over. Joshua’s family didn’t always report when he went missing – there was an acceptance that ‘this is what he does’. Practitioners working with Joshua noted that he felt like the odd one out in the family, and did not get the emotional support he needed. Joshua had very low self-esteem, and would seek validation in associations outside the home, often with older adult males who showed interest in him.

“When he was going home [...] it was nothing but aggravation, shouting, you know, all the rest of it, because of the fears that the family had – which were then pushing him out of the house, you know, into more risk. Yeah, that was always a concern.”

- Exploitation Support Worker

Stuart’s family were similarly well known to police and his father had a history of prolific violent offending. The family were close, and had a distrust of police and services. Stuart struggled with substance misuse, but this was “quite normal” within the family. Practitioners suggested that a general lack of supervision in the home, against the backdrop of non-recent domestic abuse between parents, left Stuart vulnerable to exploitation in county lines dealing.

¹⁷ County Lines and Looked After Children, Crest (2020)

“I think that there was a lack of supervision in the home. And there was historical domestic abuse between mum and dad, nothing substantiated. And he would go missing quite a lot. [...] So I think I imagine he probably started dipping his toes in [county lines] when he was at home.” – Social worker

It’s worth noting that where parents were proactive in reporting incidents where their children went missing and were responsive to social care interventions, outcomes tended to be better.

Special educational needs

For some in our sample, interpersonal vulnerabilities and the exploitative relationships that followed were related in part to special educational needs, sometimes undiagnosed. The youth offending team worker who handled **Sam**’s case felt that his undiagnosed learning needs made it difficult to educate him on the risks of exploitation; Sam struggled to understand hypothetical situations and was a ‘risk-taker’ by nature.

Michael had been diagnosed with a speech and language disorder, as well as attention deficit hyperactivity disorder (ADHD) and oppositional defiant disorder (ODD); his youth offending team worker felt that Michael’s frustrations around communication may have alienated him from protective relationships and pushed him towards harmful associations.

“A lot of times there’s frustration from young people, how they communicate with their parents and that can push them out to the community, and then there’s misreading of cues from friends. And that can lead to conflict.” – Youth Offending Team worker

Case Study: Michael

While he was growing up, social workers were not involved with Michael or his family in any significant way. But when he was 12, Michael made an allegation of physical abuse against his father and there were also signs of domestic abuse taking place between his parents, which is thought to have affected him.

When he was 15, Michael and a friend were attacked. A referral was made to the multi-agency safeguarding hub (MASH) and the case was passed to the Early Help Hub

as it did not meet the threshold for social care involvement. It was later thought that the incident may have been related to Michael's involvement in drug dealing, but at the time no connection was made.

When Michael first went missing at the age of 16, a strategy meeting was held. However, the incident was again referred to the Early Help Hub – a move which may have delayed a referral to the social care exploitation team. A month before he went missing, concerns had been raised about Michael's behaviour in school and it was noted that he had a short attention span and struggled to understand tasks. At home, Michael was displaying violent behaviour and putting his siblings at risk.

More than a week after he went missing, Michael was found out of his home area by police. He was carrying cocaine, heroin and £300 in cash – and was arrested for possession with intent to supply Class A drugs. His involvement in county lines was thought to be a possibility and safeguarding measures were considered. He was released under investigation; it was later decided he would face no further action.

A social worker referred Michael to the NRM; he initially received support under a child protection plan, which was later stepped down to a 'child in need' plan due to his positive engagement with services.

However, later that year Michael went missing again; he was found after two weeks in the same area as before. It was considered that he was still involved in county lines dealing. After that, Michael went missing regularly and was twice arrested for possession of a weapon.

Shortly afterwards, Michael moved a long way from the family home to stay in an area where he had extended family, and found work there. Although there were no further arrests recorded, there was some indication that Michael may still have been involved in dealing drugs after he was seen to exchange something at his place of work.

Those with speech and language needs or learning difficulties are also more likely to struggle in mainstream education and be excluded from school. **Liam** had received more than ten fixed-term exclusions for poor behaviour and attendance from the pupil referral unit (PRU) he attended for a year before the incident. Shortly after Liam left the PRU, the pandemic and national lockdown meant that educational arrangements were suspended. Liam's exploitation support worker said not being in education was likely to have been a

significant factor in Liam’s exploitation and involvement in county lines, as he had a lot of unstructured and unsupervised free time.

Young people who have lived through these experiences are likely to believe that they are failures; they may feel humiliated, alienated from those of the same age. They are susceptible to social interactions which generate belonging and status – even if they are exploitative. Several practitioners expressed frustration over the lack of educational support for these young people, especially where it was felt that in a more supportive environment, they could have achieved more with different results.

“[Harry] was very polite, affable. In terms of academic ability – this is what used to frustrate me – if he had been in the right environment, away from this rubbish, he would have excelled.” – Social worker

Struggles with mental health and substance misuse

Mental health difficulties were a common problem among the young people in our sample. While some were referred to specialist mental health services, such as their local child and adolescent mental health service (CAMHS), they often refused to engage. **Ben** was identified as needing help for mental health and self harm before the incident, but did not engage with support services. From a young age, he had been using drugs and alcohol excessively; at the age of 13, he overdosed. This reliance on substances may be understood as a form of self-medication, and is apparent to a lesser extent across the sample. Many of the young people used cannabis on a regular basis and had no interest in adjusting their habit. In some cases, buying and using drugs may have introduced the young people to the individuals who would go on to exploit them. Crest’s research on county lines and looked-after children noted that an unaffordable cannabis habit which functions as a form of self-medication for anxiety and depression can be used as a lever for exploitation.¹⁸

Social care placements

A minority of young people in the sample were living outside the family home on a care order at the time of the incident. Although the move into care was intended to safeguard the young person against neglect or abuse taking place in the family home, placements were often unsuitable or gave access to negative networks.

¹⁸ *County Lines and Looked after Children, Crest (2020)*

John became a looked-after child at the age of six following concerns around neglect, his mother's drug use and exposure to domestic abuse. Following a relatively stable period in foster care, John was moved across more than ten different care placements in two years, most of which were out of the area where he had previously lived with his mother. Some of the placements were unsuitable, including short-term holiday lets and unregistered care homes where John was placed by the local authority due to a lack of other options. In one foster placement, John was given Playmobil and Lego at the age of 15. In the same placement, the foster father exhibited controlling behaviour towards the foster mother. John's Social worker highlighted his care status as a key vulnerability, making him an attractive target for exploiters.

"John is a very stereotypical child in care. [He has] that sort of beacon light flashing on his head, saying, 'I am a child in care, please come and exploit me'." – Social worker

Ethan also had a difficult upbringing, and was placed into care at a young age due to a long history of neglect. Before the incident, he was moved many times because of his behaviour, frequent incidents where he went missing and difficulties finding care placements to meet his needs.

Stuart was removed from the family home after alleging that he had been physically abused by his father. There were also concerns about the impact on him of groups of people he was mixing with. The move was intended to disrupt his links with such groups but it had the opposite effect, after Stuart was placed in an area with a strong gang presence. Between the ages of 14 and 16, Stuart moved through several care placements, including two initial foster placements. Moving between placements may have cemented feelings of distrust or rejection, with Stuart drawn further into county lines and gang activity as he came to rely on people his own age as a source of stability.

"[Stuart has] not settled really anywhere, [...] he's never opened up about how he feels about things [but] my guess would be family rejection him coming into care [when] the family couldn't cope anymore. So that should have been quite tricky. He likes spending time with his family, he likes spending time with his siblings, it's really important to him" – Social worker

Features which increase someone's vulnerability, such as low self-esteem, risk-taking behaviour or feeling excluded, appear to act together to push young people towards negative and exploitative associations with older age groups. **Sam's** youth offending team

worker described him as a 'risk-taker', whose open and talkative nature made him an easy target for exploitation in county lines.

"Because of his nature of wanting the thrill-seeking behaviour, [...] the reality of him being swayed was always there." – Youth Offending Team worker

Similarly, **Joshua's** exploitation support worker felt that his involvement with older groups and the crimes they were linked with was driven by the "feeling that he kind of had use [...] a sense of belonging, and acceptance from older boys".

Extra-familial harm

Most of the young people in our sample were known to police in their home area before the identifying incident, whether through previous offending, missing person reports, or intelligence on gang involvement. In the months leading up to the incident, this activity often escalated and posed a significant risk of harm or vulnerability to exploitation.

Prior offending

While the scale and nature of prior offending varies across the sample, most of the young people in the sample have an offending history, sometimes prolific.

John was arrested by police approximately 20 times between the ages of 12 and 15, mostly in relation to criminal damage. **Harry** had been prosecuted for several offences before the incident, and police noted an escalation in his offending, from theft and criminal damage to assaults, robberies and a firearms discharge offence. **Daniel** had already served two custodial sentences at the time of the incident. Where offending was prolific, the young people were often also victims or witnesses of crime and had significant exposure to violence or harm. In **John's** case, this included witnessing a rape at a young age.

Ben had witnessed an incident in which a 14 year old fired an air pistol, and was the victim of multiple offences including assault and harassment. In two separate incidents, a group of people came to Ben's family home with weapons and an individual pointed a gun at Ben in a local park; concerned that people were "out to get him", Ben armed himself with a knife.

Gang involvement

In some cases, offending and exposure to violence were more explicitly linked to gang involvement. **Daniel, Harry** and **Max** were all associated with the same urban street gang before their known involvement in county lines. The gang had been active for decades, and the boys' involvement was thought to stem from familial connections to the gang. It is likely that much of Harry and Daniel's prior offending was linked to gang activity. At the age of 14, Harry was suspected of involvement in a violent attack involving a bladed weapon of another young person, and police were aware that he was involved in violent incidents with rival gangs.

Exposure to extreme violence from an early age has the potential to desensitise young people to extreme behaviours and normalise violence. When considering the risk of harm experienced by many of the young people through their involvement in county lines, it is important to recognise the everyday violence that was the reality for many of them.

"[Sam's] a lovely boy who has definitely been through a lot. When I speak about things that he might have witnessed [...] he will say he's seen people get stabbed and things from not paying the right money. But he finds all those things exciting. He just sees it as, there's rules and there's consequences, and certain things will just happen. So he doesn't see it as a problem. He doesn't seem to have any trauma because of what he's experienced. He just kind of accepts it as the norm." – Youth Offending Team Worker

Patterns of exploitation

Some of the young people in the sample had been arrested for drugs-related offences before the incident, but many had not. **Ben** and **Joshua** were manipulated by older members of a gang to assist in domestic burglaries. Joshua was aged just 11 years old when he was used to scope an address for an aggravated burglary.

Although the language of exploitation wasn't used at the time, police reflected that this incident was certainly exploitative and an early indication of the harmful associations Joshua had with adults in the area. Ben similarly had been forced to burgle a house, which belonged to a suspected drug dealer, after he and his family were threatened by a gang from London because of a debt he had incurred. The gang equipped Ben with a torch, a balaclava and a screwdriver to use as a weapon if interrupted.

“I think off the top of my head that possibly was the hook for [Ben...] he then was theirs.” – Youth Justice Service worker

These cases suggest that police and local authorities should employ a broader understanding of child criminal exploitation beyond county lines activity. Where children or young people enter into exploitative relationships with adults, police and local authorities should be alert to the possible escalation or long-term impact of this exploitative dynamic and ensure this is at the forefront of any intervention.

Going missing

The escalation of the boys’ offending often coincided with them going missing more often and for longer. **John’s** criminal involvement began around the same time as he started to go missing: his first recorded arrest came six days after he was first recorded as being missing. **Ethan** had gone missing from his care placements on numerous occasions before the incident, and was often found near home with friends of family. However, immediately preceding the incident Ethan had been missing for almost two months, with no sightings in the community. Where the young people were living with family, they were less likely to be reported missing to police, due to fear of a backlash towards parents or a lack of concern over risk.

“[Ben’s] parents wouldn’t report him as missing, you know, because mum would be scared that, you know, if the police picked him up and brought him back, as soon as they were gone, he would punch her in the face” – Youth Offending Team worker

Going missing can be an early indication of county lines involvement or exploitation risk, and may precede drugs offences. **Tom** was not known to police or social care services before he was first reported missing in June 2020. Over the next four months, he went missing from home three times – once returning with a cut to his lip that he could not convincingly account for. Tom was then arrested for possession with intent to supply Class A drugs.

In Tom’s case, reports that he was missing prompted a strategy discussion and his Social worker was alert to the possibility of county lines exploitation. However, elsewhere in the sample, missing person reports weren’t flagged to social care and opportunities to mitigate risk were overlooked.

Toby had been missing for a number of days before the incident, but police did not notify social care at the time, as was the practice. This meant that strategy meetings to locate

and safeguard Toby did not take place. Similarly, when **Michael** went missing for two weeks in the month before the incident, it was referred from social care to 'early help', a move which may have delayed an escalation of the issue to the exploitation team within social care.

Findings and recommendations

Theoretically any child could be a victim of CCE, but evidence shows that some young people are more at risk than others. Research shows that children who have experienced traumatic events or other serious problems which make them vulnerable, evidenced through interactions with statutory agencies have a higher probability of falling victim to child criminal exploitation in county lines.

The records of the 13 young people in our sample, all of whom experienced trauma and other serious problems before their identifying incident, reveal a pattern of vulnerability which, if identified and responded to early, could have stopped them being exploited by county lines gangs or minimised the harm they suffered.

However, not all vulnerabilities are visible, known or recorded, and the involvement of many vulnerable children who engage with agencies, such as children's social care or youth offending teams, ebbs and flows as the circumstances of their lives, and those of their families, change over time.

The independent review of children's social care highlighted shortcomings in systems of safeguarding and child protection which were designed to respond to familial harms, not extra-familial harms¹⁹. If there was a better understanding of how childhood vulnerabilities and trauma interact with the risks in a young person's environment then interventions could be put in place which reduce the likelihood of exploitation. For example, when a young person who has been exposed to domestic abuse begins offending under the instruction of adults, or is in a relationship with an adult, greater professional curiosity and awareness of the risk of organised exploitation is required.

¹⁹ <https://childrensocialcare.independent-review.uk/wp-content/uploads/2022/05/Executive-summary.pdf>

Key finding	Recommendation
<ul style="list-style-type: none"> ❖ Child protection services continue to prioritise risk within the home at the expense of extra-familial risks faced by vulnerable adolescents ❖ A pattern is visible across our sample, in which young people with multiple vulnerabilities (mental health, learning needs, abusive households) are 'pushed out' and are vulnerable to exploitation by criminal gangs 	<ul style="list-style-type: none"> ➔ Teams such as Children's Social Care, home police forces and YOTs dealing with vulnerable adolescents should embrace contextual safeguarding approaches, which involve a greater appreciation of extra familial risks ➔ When vulnerable adolescents go missing for significant periods, weeks rather than days, this should be viewed as a trigger for a crisis intervention.
<ul style="list-style-type: none"> ❖ Many boys in our sample had special educational needs or behavioural disorders which were not dealt with well by schools and appeared to lead to exclusion 	<ul style="list-style-type: none"> ➔ Police safer schools officers, youth offending workers and local authority exploitation teams should speak to schools about vulnerable teens showing signs they may be at risk of exploitation
<ul style="list-style-type: none"> ❖ High risk young people often use cannabis as a form of self-medication for anxiety and depression; their habit may also act as a lever for exploitation. 	<ul style="list-style-type: none"> ➔ Demand reduction work funded by the Home Office under the Drugs Strategy should encompass advice around the use of cannabis and synthetic cannabinoids, as well as controlling intake and handling minor drug debts.
<ul style="list-style-type: none"> ❖ Residential placement decisions made by local authorities increase vulnerability to exploitation. 	<ul style="list-style-type: none"> ➔ Local authorities should not accommodate adolescents at high risk of exploitation at 'distance' (20 miles) from their home area and should never use unregistered or semi independent settings.
<ul style="list-style-type: none"> ❖ The offending history of young people can act as an early warning sign that they may be at risk of exploitation, in particular: <ul style="list-style-type: none"> ➤ Gang affiliation ➤ Drug offences ➤ Other criminal offences involving adults 	<ul style="list-style-type: none"> ➔ Youth offending teams should routinely check with children's social care that young people with these offending indicators are in potentially harmful settings and make risk assessments and referrals, as appropriate. This could be picked up on through the youth justice assessment tool, 'Asset Plus'.

Chapter 3: Police responses to young people in county lines

In this chapter we consider how police responded to the identifying incidents of county lines involvement for the 13 children and young people in our sample. By studying the data audit files and reflecting on interviews with both police officers and children's services practitioners familiar with each case, we were able to examine the process by which the young people were judged to be victims of exploitation, willing participants or exploiters.

Victim or offender: a false binary?

In a discussion we hosted at the start of the project in July 2021, a senior children's services manager made the case that anyone under the age of 18 or younger involved in county lines should be regarded as a victim of exploitation, even if they have exploited others. It was argued that no child or young person could credibly organise a criminal conspiracy to supply class A drugs in a county line. Likening it to child sexual exploitation (CSE), they argued that a child or young person cannot give informed consent to involvement in a county drug line, therefore, the relationship is always exploitative in nature.

Police leaders disagreed. They acknowledged that mitigating factors, such as identified childhood vulnerabilities or the lack of any criminal record, should be considered, but they said police should also consider aggravating factors. For example, a history of drug-related offending might indicate that an individual holds a level of responsibility for their actions, unless evidence indicates that the individual was coerced or acted under duress. Material from digital devices and social media accounts is also perceived as potentially significant. For instance, are there messages from older people or those they mix with indicating coercion and threats, or does the young person use social media to brag about their criminal lifestyle and flaunt the proceeds of drug dealing?

But regardless of how the criminal justice system dealt with the young person, police officers recognised they were often both victim and offender. Considering the cases in retrospect, police officers usually found it difficult to draw a line.

Police officers: the reluctant 'gatekeepers' of child criminal exploitation?

The role of police in identifying mitigating or aggravating factors means they are de facto 'gatekeepers' when deciding if a young person involved in county lines is a victim of criminal exploitation. To make the decision, police relied heavily on evidence gathered at the scene of the incident and during the period that the young person was in their custody.

Most of the identifying incidents in our study were triggered by a missing person's investigation or a search of a cuckooed address. So, when police encountered the young people, they were often aware that both criminal and safeguarding responses might be needed.

"If they're missing and they're juveniles, your main objective is to safeguard them. Our first priority is to locate them to safeguard them, get them home. Depending on the situation you see them in, then you're presented with further information: this isn't just a missing person, we've got criminal offences, whether it be drug dealing, whether it be criminal damage. You absolutely have to open up your eyes."

– Police officer

Understanding that a child is vulnerable and may require a safeguarding response does not preclude the police from making an arrest where they believe this is a proportionate response. In most cases, police officers found evidence the young person was dealing drugs – they were carrying cash, drugs, burner phones or drug packaging. This led to the young person being arrested and taken into custody.

Police officers explained their decision to arrest was not necessarily because they believed the young person was culpable for the offence in question, typically possession with intent to supply (PWITS). Having spent time with the young person at the scene of the arrest, most police officers acknowledged the possibility that their offending was linked to county lines. The arrest gave them an opportunity to remove the young person from the scene – often a cuckooed address – and, where relevant, make arrangements to return them home. Crucially, taking the young person into custody gave them time to explore the extent to which they may have been exploited. It must also be acknowledged that police officers are under a duty to investigate criminal conduct. The purpose of arrest is also to obtain evidence through questioning.

"If you think they're being forced to sell drugs, why are you arresting them? Well there is an element of safeguarding them by protecting them. Because we've made the arrest, they're with the police now and we can look after them. I appreciate it's a cell and juvenile – anyone would be mortified at going into a cell. But we have that responsibility to get the safeguard in place." – Police officer

Arresting a young person permits the police to decide whether it is in the public interest to seek criminal charges for serious criminal offences which have been committed. But when they encounter a young person in a vulnerable situation, a police officer does not have a wide range of tools or sources of support to draw on. Neither do they have an abundance

of time to focus on the case. The power of arrest is often viewed by police as a potentially important step used in safeguarding a child.

Sources of evidence

We found evidence of a variety of approaches used by police in attempting to understand whether exploitation had taken place. Some of the police officers interviewed sought explicit evidence of exploitation. They felt that without this, they could not reasonably consider exploitation a factor in the young person's offending.

Digital evidence

In the case of two young people in the sample who were arrested for possession with intent to supply Class A drugs, officers described checking their phones for threatening messages. When none were found, exploitation was no longer considered as a factor in their case. However, relying on information from digital devices has limitations. A runner in county lines may have multiple handsets – burners, but possibly also multiple smartphones for additional 'operational security' ('OpSec'). Where the police have access to what they believe to be an individual's personal smartphone, manual checks may miss details visible after a full download. 'Disappearing messages', popularised by Snapchat but now available on many social media messaging apps, provide a channel for coercion. Young people also have ways to conceal apps they don't want others to see.

'Burners' or 'bricks' carried by drug runners allow them to communicate with the person taking the orders from 'customers' – the line-operator. Crest's research into the role of mobile tech in county lines revealed that line-operators and gang elders often instruct runners to leave their personal devices at home for security reasons when they are 'OT', 'cunch' or 'grafting' (terms used for working on county lines by young people)²⁰. Line-operators understand that having burners and personal handsets close-by offers the police an important investigative tool. Line-operators also understand that if a runner's personal smartphone is seized and unlocked by the police it may prove a rich source of information, leading officers back to them.

Willingness to disclose

Perhaps unsurprisingly, few officers reported finding explicit evidence of exploitation on the young person. Instead, some officers put the onus on the young person to disclose

²⁰ <https://www.crestadvisory.com/post/five-things-you-need-to-know-about-new-tech-and-county-lines>

experiences of exploitation in custody interviews. Where young people did not do so, officers sometimes disregarded exploitation as a factor in their offending.

“And if they make that decision to not engage or if they make that decision to go, no comment, we cannot support them any further when it comes to trying to safeguard them.” – Police officer

Other officers felt that a ‘no comment’ interview should not deter professional curiosity around potential exploitation – as long as the young person was under the age of eighteen.

“If we arrest someone at 18, don’t get me wrong, they can still be as exploited as a 15 year old. If they’re under the age of 18 [at the point of arrest], they’re still classed as a child. That’s the only protection they have around exploitation. If you’ve got an 18 year old, who also says no comment in an interview, then we wouldn’t facilitate or expect anything in terms of modern day slavery. If you get a child that says no comment, just because he’s a child, we still have to strongly consider exploitation here.” – Police officer

A number of officers looked for more subtle visible indications of exploitation. One police officer explained that, in his experience, arresting an individual who looked “very dishevelled” or like “they’ve not washed in days” would flag a possibility of exploitation.

Demeanour

Police officers said there were other factors – potentially more open to interpretation – which implicitly signalled to them that the young person in question may have been exploited during their involvement in drug dealing.

One example was a young person’s presentation, or demeanour, at the scene of arrest and in custody. The boys in our research sample reacted in a variety of ways – some were exceptionally aggressive, others were passive and unemotional; some reacted in a number of different ways while they were with officers. Attempts to signal defiance could be met with harsher treatment, verbally, or through the use of force – which tends to make people more uncooperative.

“We obviously tried to engage with [Ethan] who was non-compliant both verbally and what we would describe as passively – i.e. when asked to stand he just refused to move. So myself and a colleague took hold of him to detain him. At that point he became – we would term it as violently aggressive. He was pushing and pulling,

shouting and swearing at us, we did get a third colleague to join us and we had to take [him] to the floor because of his aggression” – Police officer

Officers interpreted these expressions in different ways. The officer who arrested **Daniel** described him as “very verbally aggressive” and “very anti-police”. He surmised that this was a symptom of his ingrained criminality, whereby frequent involvement with the police had worn away his respect for law enforcement. In contrast, other officers understood aggressive behaviour as a potential symptom of exploitation.

“We've found the ones that were being very aggressive have sometimes [had] factors of exploitation against them. And then when you talk to social services, you know, they've had a bit of a rough growing up, shall we say? And they're just just angry people. And a lot of the time they'll be aggressive towards police to try and, you know, I think just to try and get away from the fact that they are being exploited.” – Police officer

A number of officers acknowledged that being arrested could be stressful and understood that aggression and talking back to officers was to be expected. **Sam**'s arresting officer explained that once he was moved from the scene of the arrest, travelling to custody, his demeanour changed significantly.

“[Sam] was very cocky up to the point [where] we got halfway to custody, then he started to break down a little bit, and the wall started to come down and then he would answer a few questions. [...] He did start opening up a bit and in custody, he cried. Because obviously he knows that he's in trouble.” – Police Officer

In another example, a police officer described how **Ethan**'s emotional state changed while he was being held in custody.

“We knocked on the [interview room] door and as we entered Ethan picked up a chair and raised it above his head. He had to be restrained and then was removed back to his custody to calm down. During the interview process, however, he was very calm...I think he then realised that we were there to try and assist him as best we could.” – Police Officer

The police officers who encountered these young people did not know them. There were no prior relationships to build upon. Officers could not make references to their peers, family members, Social worker, GP or headteacher. Young people arrested in dealing bases are isolated and confronted with an apparently hostile environment. They should not be released under investigation ('RUI') – they should be bailed, with the youth justice

system consulted about the nature of conditions that can be added to best support both child and caregiver. Changing the nature of the interaction during the brief time the young person is in contact with the force – a ‘teachable, reachable moment’ – should be a priority; to avoid harm but also to increase the likelihood of eliciting disclosures or at the very least prompting reflection.

The role of age

The Home Office’s Serious Violence Strategy (2018), which contains the ‘county lines action plan’, states that “The strategy includes data, research and measures aimed at young people (under 18s) and young adults (by which we mean a broader group of younger adults up to the age of 25).”²¹ There has been recognition in public policy circles that the cut off at the age of 18 can cause harm and increase vulnerability for some, and that a new approach is required to bridge the gap²². The term ‘transitional safeguarding’ coined by Dez Holmes & E. Smale, 2018²³ provides a useful shorthand for this agenda.

However, the third annual report of the ‘Rescue Response’ service for victims of county lines provided by the Mayor’s Office for Police and Crime (MOPAC), contains a telling statistic.²⁴ Data from the National County Lines Co-ordination Centre (NCLCC) in the Rescue Response report shows that ‘Young adults’ (aged 18-25) make up 69% of those flagged by police when flagged, but represent just 22% of Rescue Response referrals, despite the fact that ‘Rescue Response’ works with potential victims aged up to 25. This is mirrored in the proportion of NRM cases flagged as county lines cases. Since January 2020, county lines referrals have been identified by a ‘flag’ on the system. In 2021, 400 of the 2,112 such cases (18.9%) were aged 18 or over. In the first two quarters of 2022, the proportion of young adults has fallen to 171 out of a total of 1142 (14.9%)²⁵.

This suggests that despite a focus in public policy on transitional safeguarding and a push to extend services for the vulnerable, a young adult over the age of 18 flagged as being involved in county lines has a one in five chance of being considered a victim of exploitation.

²¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698009/serious-violence-strategy.pdf

²²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/990426/dhsc_transitional_safeguarding_report_bridging_the_gap_web.pdf

²³<https://www.researchinpractice.org.uk/all/publications/2018/august/transitional-safeguarding-adolescence-to-adulthood-strategic-briefing-2018/>

²⁴ https://www.london.gov.uk/sites/default/files/rescue_and_response_strategic_assessment_2021.pdf

²⁵<https://www.gov.uk/government/statistics/national-referral-mechanism-and-duty-to-notify-statistics-uk-april-to-june-2022>

Assigning culpability amongst under 18s

Police officers were aware that the young people in our sample were under the age of 18, but none of them felt that this automatically indicated that they were victims of exploitation. Most agreed that vulnerability to exploitation stemmed from their position and role within the dealing structure. So, for example, a younger person may possess attributes which provide them with a higher status than their peers.

“It's not always about the age. It's about the power and where they stand in that relationship”. – Police officer

Despite personal reservations, police officers were willing to consider the possibility of exploitation in cases involving young people under the age of 18.

“Do I think that some of the 17 year old lads are well in control of what they're doing because they've probably been doing it for the last three years? I do think they're in control of it. But who am I to say it's not exploitation?” – Police officer

“If you arrest someone who is 18, they can still be exploited just as much as a 15 year old. But obviously, at the time, if they're under the age of 18, they are still classed as a child. And that's their only source of protection they have in terms of exploitation. If you've got an 18 year old, who also says no comment in an interview, ... we wouldn't you know, facilitate or expect anything in terms of modern day slavery. But if you get a child who says no comment, just because he's a child, we still have to strongly consider exploitation.” – Police officer

This was particularly the case where young people were found at the scene of the incident with much older associates. The age gap highlighted the vulnerability of the young person. **Max**, aged 14, was arrested alongside two adults. The arresting officer explained that the considerable age gap indicated to him that Max was involved in an exploitative dynamic, and therefore he was viewed as a victim of exploitation.

However, assigning victimhood and culpability based on age, when all of those present are children, can lead officers to make assumptions based on age alone. Another police officer told us about an incident where a 13 year old was found along with a 16 year old associate. He arrested the 16 year old, explaining that culpability at the age of 13 “is very different to 16”. The 13 year old was considered a likely victim of exploitation, while the 16 year old was not. How might this 16 year old have been treated had they been found with a 17 year old, or an adult?

However, it was clear that, where the individual arrested was aged 18 or older, officers immediately considered them less likely to have been exploited and often did not feel obliged to investigate this possibility.

“Kids are now getting to that over 18 stage and still being provided with that NRM card and the CPS are refusing to prosecute because they’ve got that previous marker of being groomed by the gang.” – Police officer

Previous offending

Police officers’ understanding of exploitation was complicated when they considered young people’s offending histories to be ‘aggravating factors’. While most officers considered that a prior indication of exploitation would reduce culpability, the extent to which past offending factored into their decision-making was less clear. A young person’s culpability was thought to be raised particularly where they had demonstrated a significant risk to the community.

*“This is the issue we have in managing any drugs line and prosecuting anyone involved in these offences: at what point do you change from being a vulnerable victim to actually becoming an offender? **Harry** and **Daniel**, prior to these arrests, had both been arrested and linked to firearm offences. As in, they’ve held a firearm and shot it at a rival gang member. It’s open to interpretation but at what point then are you a victim really? Once you’ve made that conscious decision to arm yourself with a firearm and try to potentially take the life of someone else from a rival gang?” – Police officer*

However, navigating the relationship between previous offending and culpability was especially difficult where young people had a history of offending; they were often also highly likely to have been victims of crime.

“100% they still need some sort of safeguarding. It’s difficult because a lot of these offenders are victims themselves. Obviously victims of vulnerability but also then intended victims from other groups. We might be arresting them for a firearms discharge one week but then, when there’s a retaliation attack the following week, we are then treating them as victims and will do everything in our power to protect them and prevent any offending taking place.” – Police officer

'Frequent flyers'

There was disagreement amongst police officers as to whether a litany of previous arrests for offences linked to county lines increased culpability or not. Some felt that if a young person was arrested for offences linked to county lines on multiple occasions, they had spurned opportunities to escape exploitation. If they remained involved, it was therefore seen as a positive choice. Others disagreed, demonstrating an awareness that when drugs or cash are seized from a young person as part of an arrest, it often creates a debt for the young person to those running the line. Our wider research showed that debts often kept young people involved in county lines. One of the boys in our sample was exploited directly as a consequence of a drug debt incurred by his friend when he was arrested.

"He was a bit miffed and a bit peed off because he was like, 'I know I've got enough on me to clear my debt and you're taking it off me again. You've got me back to square one.' He disclosed that he was back in debt because of us [the police] having seized those drugs and money again." – Police Officer

Another officer argued that it was unfair to view repeated county lines involvement as having any bearing on their culpability because it was all they knew – especially in cases where their wider familial or social networks were also involved.

Police officers explained that when a young person was arrested for additional county lines offences, their culpability was thought to increase where there was evidence they had climbed up the dealing structure hierarchy. This was particularly correlated with age. One officer explained that a 17 year old who had been doing this for a number of years was certainly more culpable than a less experienced peer.

"The lower level offenders won't be trusted a lot of the time to handle large amounts of cash, to handle firearms. Once they've sort of stepped up to commit those more serious offences, for me, they will take that larger step into becoming a suspect." - Police Officer

None of the police officers we interviewed expressed the view that the longer a young person is involved in county lines, it might become harder to plan an exit if you have been involved for a longer period of time, or did they recognise that due to the violent nature of county lines may increase rather than normalise trauma as it escalates in frequency and severity. A senior youth justice manager also suggested to us that "even if you can (exit gang life), the police and the local authority don't let you move on. We class you as too high risk to do normal things, such as college".

Going with your gut

Police officers working with the boys in our sample were rarely able to cite examples of clear evidence of exploitation in the cases they had dealt with. In most cases, they relied on indications of exploitation or vulnerability to exploitation. Whether or not potential indicators of exploitation were adjudged to aggravate or mitigate the young person's culpability, however, was different in most cases.

Police officers told us that, in the absence of clear evidence of whether or not a child or young person had been exploited, they often relied on experience and instinct. The officer who arrested **Sam** explained that, in his experience, understanding exploitation relied on a "feeling that, actually, something's not right here...".

Case Study: Sam

Sam first came to the attention of social care when he was five years old after he got lost while playing in the street. Over the following years, Sam went missing a number of times, but there was no indication of exploitation or drug dealing. When Sam was 12, he exhibited sexualised behaviour and social care staff raised questions as to whether he had been the victim of sexual abuse. The result of their enquiries isn't known. Sam was placed on a 'child in need' plan due to concerns about his behaviour.

A year later, Sam and his family relocated to Egypt where they lived for just over a year. The move disrupted Sam's education and support for substance misuse. Practitioners suspected that he had significant undiagnosed learning needs and it is not known what, if any, support Sam received in Egypt.

Just months after Sam returned to the UK he went missing from home for two days and was found with a large amount of drugs. He was arrested and again placed on a child in need plan.

Two months later, police found Sam and a friend at a cuckooed address in an area where they weren't living at the time. Officers found drugs, £800 in cash and burner phones on Sam and his friend. The boys, aged 15 at the time, were arrested for possession with intent to supply Class A drugs. It transpired that Sam had been reported missing by his family two days earlier.

Police supported social care to make an NRM referral based on their suspicions Sam was being exploited and he was later recognised as a victim. The criminal investigation into alleged drug possession was dropped due to evidential difficulties.

Sam was initially confident and cocky with the police. But he changed in police custody, where he became visibly anxious. Sam was referred to youth offending and young people's services following the arrest but didn't engage with them and could not be compelled to as he had not been charged.

Over the following year, Sam was arrested for a number of Class B drug possession offences but there was no intelligence linking him to county lines dealing. A youth offending team worker thought Sam wanted to move away from county lines because he realised that it was affecting his mother.

Many of the officers we interviewed showed a nuanced understanding of how exploitation might manifest itself, and therefore felt equipped to make decisions about culpability. They were, however, relying on experience and intuition rather than objective tests. Most were unable to articulate exactly what it was that led them to identifying the presence of criminal exploitation.

Experience and specialism

Police officers with greater experience of county lines, especially those in specialist roles, are more likely to understand child criminal exploitation and, therefore, identify potential indicators that a child or young person may have been exploited. The officer who arrested **Tom** was part of a dedicated county lines taskforce. Tom was stopped by officers because he did not have a valid ticket to travel. However, the arresting officer identified signs of potential county lines exploitation:

"[Police officers], if they're not used to [county lines], if they're not exposed to that, day in day out like we are, they might not see them coming in because [they] are just a young lad travelling without a ticket. [They] will leave him as [he is] and [send] him on his way. Whereas [...] actually no, these are very strong indicators that someone can be involved in county lines, we need to start asking more questions to see what's going on". – Police Officer

In contrast, one police officer, who was not part of a specialist team and had limited experience of county lines, described an incident in which he had found the exploitation of four young people difficult to determine. He suggested that all four were victims of exploitation, but struggled to reconcile this with the belief that they could be involved for economic gain and did not appear to be scared of police.

“From the face of it, I think all four of them are getting exploited. [...] They were all young – even the one who was over 18. No one there appeared to be the boss. They seem to be level pegging...It’s very difficult to know if they’re being pressured into it or if it is just a better life. You know, that they’re getting paid X amount just to do what they probably don’t see as a risk. They didn’t come across scared. They’re not emotional or anything.” - Police Officer

The police officer explained he had been tasked with tackling drug dealing identified at the address. The directive was to focus on “firefighting the issues of drugs and the gangs”. He did not feel that he had the understanding or training around county lines at the time, especially the role of exploitation.

“There’s not really a great understanding [of exploitation]. I don’t think we get enough training or direction. Locally, we are tasked with ‘there’s drug dealing going on here, get to the area’. It’s more firefighting the issues of drugs and the gangs. And we don’t focus too much on the bottom line: these are children, they’re getting exploited, they’re the ones at risk.” – Police Officer

Inconsistencies in the level of experience or specialist knowledge police officers bring to county lines cases can have dire consequences for young people.

In one case, it put a young person at severe risk of harm. When arrested, he told officers that drugs had been inserted inside him (‘plugged’). As a result, the young person was taken to hospital but remained under police supervision as he was still under arrest. He had to undergo an operation under anaesthetic to remove the plugged drugs; if they had split he probably would have died. However, social care staff involved in the case were critical of the initial police response, and recalled that police officers handcuffed the young person to the hospital bed – which they considered to be an unnecessary use of force.

The actions of the police officers who had arrested and accompanied the young person to hospital were informed by intelligence passed to them by another force’s criminal investigation department (CID). Such units typically dealt with adults, and with a focus on investigation and prosecution, they may have lacked a nuanced understanding of exploitation and vulnerability for young people involved in county lines. Social care staff later shared their concerns about the young person’s exploitation, at which point he was unarrested.

“The police weren’t treating him as a victim, in our opinion. So I think obviously, once they’ve done further investigations and understood that he was actually a

victim of criminal exploitation, he was allowed home, and mum went and picked him up” – Social worker

The young person’s Social worker reflected on the significant trauma that the incident would have caused him, and the likelihood that it was compounded by the police’s actions.

“It’s traumatic for him [...] he’s been trafficked through [...] different cities. And in a way as well, it’s sexual assault, isn’t it that another person has plugged him with drugs, and then taking him to houses which are not appropriate for him to then be in, and to then be arrested, strip searched, and then go through an operation to take the drugs out. I understand all of that would have been really traumatic for him. I think it really did hit home that it’s serious. It wasn’t something that he was in control of” – Social worker

This example demonstrates that, without appropriate and up-to-date training, police officers tasked with ‘rolling up’ county lines could cause serious harm and trauma to young people who are already highly vulnerable and traumatised.

Charging decisions and outcomes

Criminal justice outcomes for the young people varied across the sample in relation to each county lines incident. The cases of three of the 13 boys were dealt with in court. Although police accepted that **Tom** was likely to be a victim of exploitation, it was decided that there was not sufficient evidence to demonstrate this conclusively. **Tom** received a 12 month rehabilitation order for his PWITS Class A offence, which he completed after five months.

Cast Study: Tom

Tom first went missing from home in summer 2020. He returned and said he had been staying with friends. There was no indication of exploitation or county lines involvement.

But a week later Tom was stopped in an area known for drug dealing and found with six wraps of a white substance. He was arrested and completed work with the youth offending team. A couple of months later, Tom went missing again before being found out of his home area. When interviewed, he was evasive and non-committal and was placed on a ‘child in need’ plan due to concerns he was being exploited; an NRM referral was made.

In the months that followed, Tom continued to go missing. He twice returned with facial injuries that he could not convincingly account for. Tom was arrested again after he was seen exchanging something with a woman and found to be carrying cash and drugs, but no further action was taken.

Several days later, Tom was stopped by police at a train station after trying to pass through barriers without a ticket. It was in the evening and he was travelling alone. When asked why he was there, Tom was not able to give a coherent or detailed answer.

Police checks revealed that Tom was in breach of his curfew²⁶, which gave officers further cause for suspicion, and he was detained so he could be searched. Thousands of pounds' worth of drugs were found, hidden on Tom and at his home address. Recognising that the seizure by police of such a quantity of drugs was likely to put Tom in significant debt or at risk of violence, the priority was to keep him safe.

Tom's Social worker said he appeared subdued and vulnerable in custody. Tom revealed that he was involved in dealing drugs for a county line, but insisted it was his choice and he was not being exploited. A multi-agency strategy meeting was held with police, social workers and other agencies and Tom moved to stay with a relative for his own safety.

Police analysed Tom's phone but did not find evidence of exploitation; he answered 'no comment' when asked questions about modern slavery. Officers felt it was likely that Tom was a victim of exploitation but there was not enough evidence to demonstrate it conclusively. As a result, Tom's case was treated as a Class A PWITS offence. Police did not make an NRM referral at this stage and their involvement in his case ended.

Tom's Social worker followed up on the NRM referral made a few months before but no decision had yet been made. At court, Tom showed remorse and a desire to re-engage in education; he was given a 12 month youth rehabilitation order.

After the sentencing, a 'conclusive grounds' decision was delivered in relation to the earlier NRM referral by social care, indicating that Tom should be considered a victim of exploitation. After five months, the rehabilitation order ended as Tom had complied with the requirements and had not been reported missing again.

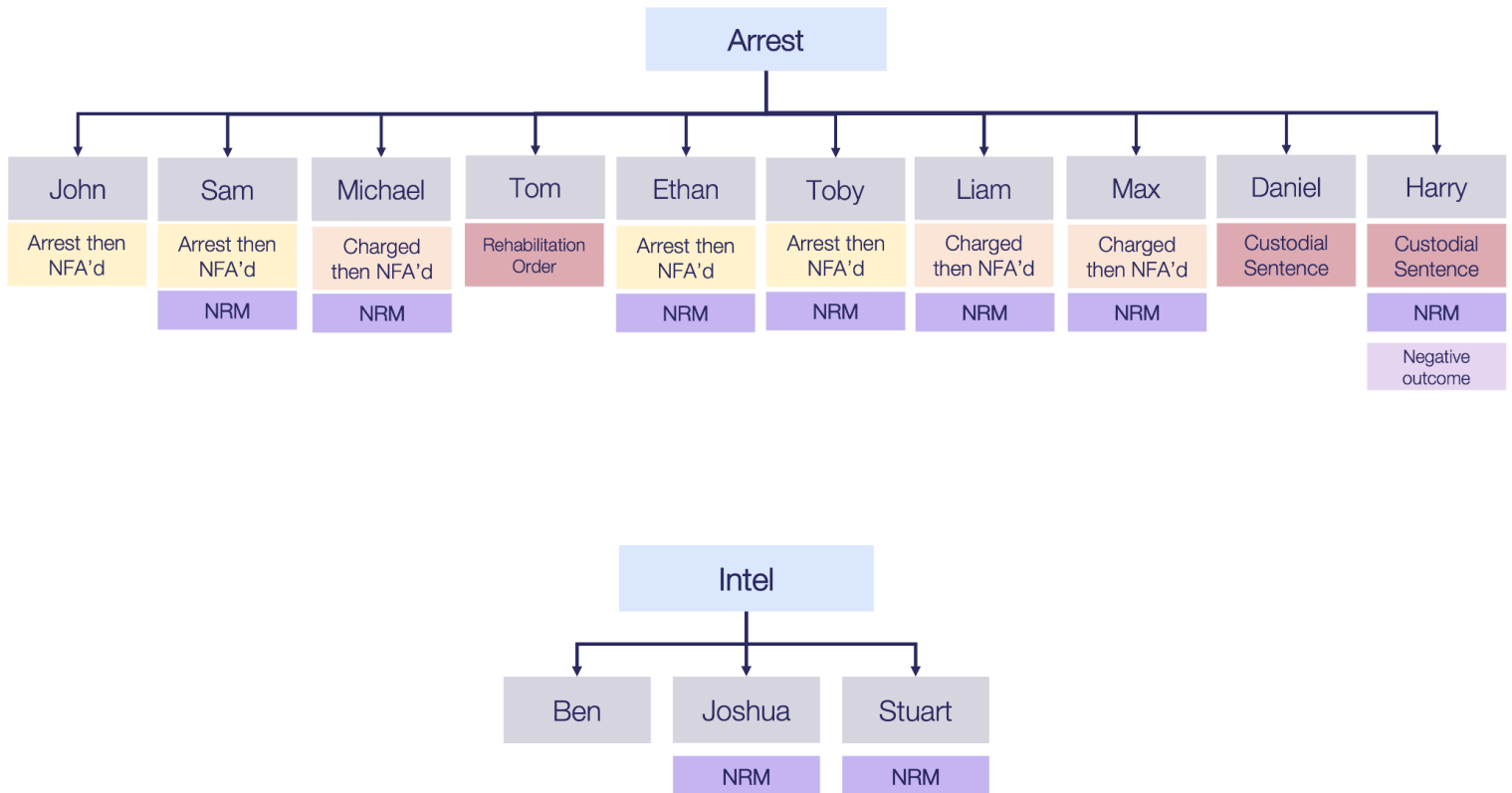
Both **Harry** and **Daniel** were given custodial sentences for their respective drugs possession offences. Harry's case was referred to the NRM but it was concluded that he was not a victim of exploitation or modern slavery. No NRM referral was made in Daniel's case. The seriousness of his previous offending, specifically a firearms offence, contributed to the police and prosecution decision to consider him an offender, rather than a victim of exploitation.

²⁶ The specific offence for which Tom was under curfew is not known.

Other criminal justice outcomes

- For **Stuart** and **Joshua**, intelligence regarding their likely involvement in county lines prompted an NRM referral, despite the absence of an arrest linked to county lines
- No referral was made for **Ben**. Case workers reflected that the NRM “wasn’t popular” at the time
- No further action was taken against four of the young people: **John**, **Ethan** and **Toby** were de-arrested by police when it became clear that they were victims of exploitation. In **Sam’s** case, a lack of evidence led to the case being dropped.
- **Michael**, **Liam** and **Max** were initially charged for a PWITS offence, but the charge was dropped when it was recognised that they had likely been exploited. An NRM referral was made for all three boys.

Fig 4. Criminal justice outcomes for each individual, including NRM referrals



Although reaching a binary decision on whether or not young people were victims of exploitation perhaps seemed necessary within the context of the criminal justice system, police officers often felt that the final decision did not reflect the complexities of each case. Officers must follow protocol. In cases where a young person was not charged, police officers still referred to the fact that they had some choice in their behaviour. In cases where young people were charged, police officers expressed an understanding that they had experienced exploitation. Most felt it was impossible to come to a firm conclusion as to whether the young person was a victim or an offender at the time, which seems reasonable given the fluid and sometimes dual identity of exploiter and exploited.

Findings and recommendations

A defining characteristic of county lines is that young people travel to areas where they are not known to deal drugs. The police there might know nothing about them. A young person may say nothing or provide false information during arrest or in custody. They may have nothing with them which offers concrete evidence of exploitation.

As a result, when police identify a young person involved in county lines, decisions around the relationship between exploitation and culpability are based on the context and informed by an officer's interpretation and experience. A nuanced understanding, built on experience of handling such cases, is important to navigate the complexities of exploitation – but such expertise appears to be confined to specialist teams. In the absence of clear evidence of culpability in drug dealing or exploitation that would support a charge, the arresting force are usually wasting their time attempting to elicit disclosures – time would be better spent locating the real wrong doers who flood towns with street heroin and crack cocaine.

We are proposing a major change. But given the 400 day plus lacuna demanded by the courts for a conclusive grounds NRM decision in order to decide whether or not a child is a victim; and the lack of any support or protection for that young person, it is hard to argue that the current response is either tough or robust. The scale of county lines drug dealing, and increasing enforcement activity to counter the problem, means that in many cases officers with limited experience in non-specialist roles will encounter young people who may have been criminally exploited. That's why there is an acute need for clear guidance and consistent training across all forces, led by the National County Lines Coordination Centre and senior officers leading on the issue for the National Police Chiefs' Council.

Key finding	Recommendation
<ul style="list-style-type: none"> ❖ Inexperienced and non-specialist police officers struggle to spot indicators of exploitation. Concepts such as trafficking and modern slavery are not well understood. 	<ul style="list-style-type: none"> → There is an acute need for regularly updated training for first responders on modern slavery, child trafficking and child criminal exploitation. → Training should be consistent across police forces, reflecting the cross-border nature of county lines activity and the need for a coherent response
<ul style="list-style-type: none"> ❖ Police forces receive insufficient external support in dealing with a highly complex and rapidly evolving threat, compared with other types of exploitation, such as child sexual exploitation. ❖ For example, when police forces arrest children and young people from ‘out of area’, it can take up to 72 hours to establish whether they are already ‘in the system’ under the NRM. 	<ul style="list-style-type: none"> → The Crown Prosecution Service (CPS) should offer early advice to police forces where exploitation is suspected, modelled on the approach used in cases of rape and serious sexual assault → The CPS and police forces should work more closely together on cases of suspected CCE and develop a joint investigative strategy
<ul style="list-style-type: none"> ❖ Age is not a reliable indicator of the likelihood of exploitation making it hard to assess the level of culpability. Young people arrested ‘out of area’, cannot reasonably be expected to make disclosures regarding exploitation. ❖ A child aged 15 or younger will usually be incapable of organising a criminal conspiracy to supply class A drugs away from their home area and they cannot provide informed consent to becoming involved in such an undertaking. 	<ul style="list-style-type: none"> → Teenagers 100 days shy of their 18th birthday or younger arrested for a drugs offence linked to county lines should be considered a high-risk safeguarding priority, requiring an urgent, crisis response. → They should be returned to their home area for intensive support to minimise the risk of re-exploitation. We have used this cut off point in terms of age because it is aligned with the Home Office pilot scheme localising the Single Competent Authority function (SCA) of the National Referral Mechanism (‘NRM’)²⁷. → Local exploitation panels, involving senior specialists from both local authority children’s services and the home police

²⁷<https://www.gov.uk/government/publications/piloting-devolving-decision-making-for-child-victims-of-modern-slavery/devolving-child-decision-making-pilot-programme-general-guidance-accessible-version>

force, should have access to 'Safeguarding Orders'; civil orders which enable them to control and protect potential CCE victims whilst also deterring and preventing their exploiters from re-establishing contact. This approach could involve the creative use of existing orders, or may require new legislation.

Chapter 4: Local responses to criminal exploitation

After many of the 13 children and young people in our sample were identified as potential victims of child criminal exploitation in county lines, they spent a short period of time in the custody of the arresting police before being returned to their home area or to a residential placement commissioned by their home local authority. Young people arrested in county lines often carry a debt to their exploiters for lost drugs or money and so may be at risk of re-exploitation. They may receive threats of violent reprisals from criminal gangs and organised crime groups ('OCGs'), including against their families, parents and carers. This chapter focuses on what happens to young people and their families in these situations.

The role of the local authority after 'identifying incidents'

Local authorities have a different role to police. They are not required to determine culpability, and lack the information to do so, although they may provide information to help police make such decisions. Local authorities are often involved after an incident but often only after the police have responded. **Ben** and **Joshua's** cases were the only ones of the 13 we studied where social care staff were aware of the incident before police were involved – as both boys had told an allocated worker about their involvement in county lines, triggering a police referral.

A well-run children's services directorate may know enough about a young person to regard them as **a** victim of child criminal exploitation, but they may know very little about the incident which triggered the police response on a particular occasion. In contrast to the police, local authorities are less interested in whether a child or young person is **the** victim within a particular incident and more interested in whether they are **a** victim in general terms.

Local authorities lead the safeguarding and child protection functions, as set out in the Children Act and the Department for Education's 'Working Together' guidance. The local authority response to a young person's involvement in county lines can be broadly grouped under two main functions:

- (i) Safeguard against risk to children and young people, both immediate and longer term
- (ii) Educate, develop skills and build resilience for children and young people

Safeguarding against risk

Where a young person has been arrested in relation to county lines, or located after they have gone missing, children's services practitioners from their home local authority play an important role in the initial safeguarding response. This can include visiting the young person while they are in the custody of the arresting force, or arranging a visit to their home or care placement. This is in addition to the offer of a 'return home interview'.

However, considering the level of risk faced by children and young people who are potential victims of criminal exploitation in county lines, and the associated risk to their parents or carers and other family members, local areas should also act to protect these young people from harm and re-exploitation.

Children's social care placements

One option available to children's social care is to remove the young person from their family home and to place them in care under the terms of the Children Act 1989. Where the young person is already in care, there is an option to move their placement to a setting that is better suited to meet their needs. This usually means moving them away from the location where they have been groomed (often the home area) or the area where the 'identifying incident' took place. With the acute pressure on placements at national level for adolescents this is highly problematic without significant financial investment. For example, one senior manager in children's social care told us that there is a shortfall of around 500 places in London alone.

In some cases, local authorities viewed removal into care as a positive step, providing space from domestic instability and community risks:

"[Joshua] obviously knew he needed to move away in order to gain a good relationship back with his family, because he understood the risks that he was bringing to the family home." – Exploitation Support Worker

Ethan was placed in secure accommodation under a Deprivation of Liberty Order ('DoLS')²⁸ after he was de-arrested for a PWITS Class A offence. A court decided it was needed to keep him safe because he often went missing for long periods. Although secure placements are described as a safeguarding measure rather than a punishment, the doors are locked and residents are unable to leave unless they have an agreed mobility plan or a medical or legal appointment. The view was taken that Ethan would not have been safe in

²⁸ <https://www.communitycare.co.uk/2016/07/14/guide-law-deprivation-liberty-children/>

any other environment, and required a period of intense support with a key worker to understand the risks associated with county lines and exploitation.

"I think our view at the time was that, if we don't take some quite significant action, really, the likelihood is that we were going to find ourselves in a situation where he was being exploited again." – Social care worker

"I think they know that it's a safe place, they're there for safeguarding and welfare. It isn't a prison, it isn't a youth offenders Institute as such, however, the doors are locked." – Social care worker

However, a fresh care order or a change in placement is not a panacea and may be counter-productive. This was true for **Ben**, who was taken into care in the months after he disclosed that he was involved in county lines. His relationship with his parents had deteriorated and they felt they were no longer able to manage his behaviour at home.

Due to a lack of local suitable accommodation, Ben was initially placed in supported accommodation away from the town where his family were based. Such accommodation is designed for adolescents who are transitioning to independent living. While there, **Ben** mixed with known drug users and offenders, drank alcohol excessively and went missing regularly. Ben's Social worker reflected that moving him did not resolve the problem, but merely relocated it.

"There was a lot of alcohol abuse by him. And a lot of offending that was linked to the alcohol abuse as in a lot of public order, threatening words. When the police or ambulance services were called to pick him up, there was a lot of him being physical with them." – Youth Justice Service

"Sometimes we try to place them far away from home just to break that friendship group, but they would try to link up with people wherever they are, which is like you're moving the problem, you know, or you're moving the child, but you're not actually moving the problem." – Social worker

Ben was then moved to supported accommodation closer to his family home, but continued to go missing and mix with known offenders, often older in age. The placement broke down after he went out with a group and burgled five houses, for which he received a custodial sentence.

Case Study: Ben

Ben's family were well-known to social care staff. An older sibling had been placed in care, and an allegation had been made that Ben was sexually assaulted by his older half-brother when he was four. It affected Ben's behaviour at home and his interactions with children at school. It is not known if Ben ever received therapeutic support. Practitioners suspected that Ben had witnessed extensive domestic violence and abuse between his parents; he had been on a child protection plan for neglect between the ages of 13 and 15.

Ben was known to youth justice services from the age of 13. His early offending was largely contained within the family home – smashing windows or assaulting his mother and father. He was using drugs and alcohol excessively and at 13 overdosed – but there was no indication of exploitation at this stage.

Ben regularly went missing. Aged 15, he was charged with his first drugs-related offence, possession of Class B. Around this time, police were called after he armed himself with a knife claiming people were 'out to get him'. On separate occasions, a group of people came to Ben's family home with weapons and an individual pointed a gun at him in a park.

Later that year, Ben received a 12-month detention and training order after pleading guilty to burglary. Ben said that he had been forced to burgle the house, which belonged to a suspected drug dealer, after he and his family were threatened by a gang because of a debt he had incurred. Practitioners suggested that this incident was 'the hook' in his involvement in gangs.

Six months later, Ben told his Social worker that he had been robbed of a large sum of cash and was being threatened by the person whose money it was. Police suspected that the money was linked to county lines dealing. Around this time, Ben was severely injured by a group of people. Professionals working with him noted that he appeared scared and withdrawn. He was drinking alcohol to the point of paralysis and on many occasions was found passed out in the street.

Ben was placed on a child protection plan linked to gang concerns and was referred to a specialist exploitation service who delivered bespoke interventions. However, he refused to engage with the service. Referrals to drug and alcohol addiction services and mental health support had limited effect as he refused to engage with them too. No NRM referral was made, but police reflected that the NRM was not in popular use at the time. Although practitioners thought Ben was a victim of exploitation, he would not have recognised himself as such.

Ben's relationship with his parents worsened, and they felt no longer able to manage his behaviour at home. Due to a lack of suitable accommodation locally, Ben was initially

placed in supported housing away from the town where his family were based. While there, Ben mixed with drug users and offenders and regularly went missing.

Ben was later moved to supported accommodation closer to the family home, but continued to go missing and associate with offenders, who were often older. The placement broke down after Ben went out with a group and burgled five houses. He was picked up by police and given a custodial sentence; by the time of his release he was almost 18 years old.

Stuart was also removed from his family home in an attempt to change his behaviour. Instead his placement propelled him towards people and activities that cemented his involvement in county lines.

“I think they wanted to move him out of the family home to try and help these behaviours and try and manage it. But actually, he then started smoking cannabis. He then was making friends with people in the area, and he was hanging out with those people most of the time.” – Social worker

Children’s social care practitioners told us they consider the best interests and preferences of a child when deciding where to place them. But the decision is shaped by what’s available. At present, there is a shortage of suitable foster care and registered residential placements for vulnerable adolescents. A young person already in care or entering care may choose a placement well away from their home area or areas they feel are dangerous to them, but ‘exile’ – as it is termed – is not a robust long-term solution for someone that age. Care homes, registered or otherwise, are often situated in areas of low property value which are, in turn, targeted by county drug lines and local illegal drug markets. The use of mobile phone technology by young people means they can always be reached, even if they are hundreds of miles away²⁹.

Police and local authority tensions

Joshua’s case illustrates how residential placement decisions can go seriously wrong. After Joshua told his exploitation support worker that he was involved in county lines, social workers considered placing Joshua with his biological father because of his mother’s inability to cope with his behaviour and safeguarding concerns in the community. However, police did not feel the placement was suitable, as Joshua’s father had a history

²⁹<https://www.contextualsafeguarding.org.uk/media/43zpa5y/the-use-of-out-of-home-and-secure-care-in-r-espone-to-child-sexual-abuseexploitation.pdf>

of selling Class A drugs, so officers used their powers to keep Joshua on police premises and compel social workers to reassess the proposed move. Police protection powers allow officers to keep a child in protective custody for up to 72 hours if they believe the child is at risk of significant harm.³⁰

“We did that because I felt it was the only way to immediately safeguard [Joshua], I didn't think the opportunities being considered by children's social services were appropriate to the level of potential risk. But I also did it because I feared him becoming a high risk missing person, because at that point, he wanted to walk from the building.” – Police officer

The police officer who exercised the powers acknowledged this was not the ideal response and may have damaged the relationship between Joshua and the police. Given Joshua's subsequent reluctance to engage with police, he is likely to have felt that the safeguarding measures were more of a punishment than designed for his protection.

Social care staff ultimately made the decision to place Joshua in a residential placement, rather than with his biological father. The placement was in a rural area and Joshua's Social worker believed that he felt safe there. Once all direct work around exploitation had been delivered by social care, and the risk was deemed to have subsided, Joshua was moved to a placement closer to his home area.

While at the placement, which was close to a bail hostel, staff spotted Joshua exchanging something with adults known to police for drug dealing. MDMA tablets were found in a search of his bedroom and he was arrested for possession with intent to supply Class A drugs.

The location of the placement was clearly unsuitable. Where a decision is taken to place a child into care, or move a looked-after child across care placements, improved communication and proactive intelligence sharing between police and local authorities is critical. Had key intelligence been taken into account when children's social care staff made decisions in Joshua's case, unsuitable placements would have flagged as such and the use of police protection powers could have been avoided. The response to potential child criminal exploitation for young people such as Joshua requires a multi-agency crisis intervention in which the police and children's social care are aligned and united in their decision-making.

³⁰ Notably, the working relationship between police officers in this force and social care has improved significantly, and it is unlikely that a similar measure would be taken now.

Building resilience

Another role played by local authorities in response to a young person's suspected involvement in county lines is to inform them of the risks and harms of exploitation, and assist them to develop the skills and resilience to protect against re-exploitation. This direct work is primarily delivered by social workers, exploitation support workers (where this role exists within social care), and youth offending team workers. It is often delivered in tandem with referrals to relevant specialist services, such as CAMHS.

For the young people in our research sample, direct work on exploitation was typically delivered via a combination of worksheets, informal discussions and exercises.

Education was more impactful where it resonated with everyday experiences

Case workers noted the difficulty of communicating the risks and harms of exploitation to young people involved in county lines, especially where the young people didn't recognise themselves as victims of exploitation – as was typically the case across the sample.

Practitioners stressed that the language used to discuss exploitation should be relevant to, and reflective of, the young person's understanding of their experience. Case workers tended to avoid terminology that would alienate or confuse the young person, and instead focused on how the young person experienced and understood their day to day lives, whether they felt under pressure or in control of the situations they found themselves in.

“Young people laugh it off when you start talking about exploitation with them [...]. You can tell they just don't have a clue what's going on. Again, because a lot of the people are involved in it with all their mates, so they don't see any exploitation because they know everyone, and those people know someone else, and those people know someone else. And what they don't realise is that the person up there does not care one little bit for you down there.” – Youth Justice Service, case worker

Where a young person had difficulty expressing themselves, processing information or understanding hypothetical situations because of a learning difficulty or speech and language need, adaptive approaches were key to engaging them.

“[Sam] has undiagnosed learning difficulties. So it's quite hard to deliver any kind of intervention to him. [...] It makes it hard for him to focus, hard for him to understand hypothetical situations. And he's very much a risk taker. [...] It was trying to help him

understand that the people that are giving him these drugs to sell, [...] they're the ones that are getting all the profits, and they're not actually putting themselves out there, it's him that's running around with the knives and him who is more likely to get caught, go to prison.” – Youth Offending Team, case worker

Dedicated exploitation support relieves pressure on social worker

Some local authorities have dedicated exploitation support workers in children’s social care who can focus on the exploitation risk, relieving pressure on the Social worker to address broader issues such as housing and finances. However, in other areas, contextual safeguarding such as this is minimal.

Interventions delivered through strong, existing relationships were impactful

Establishing a strong relationship with a young person is essential to the delivery of meaningful interventions. Some young people, such as **Stuart**, received support from several different practitioners in education, social care and youth justice. Extensive involvement from different professionals risks intervention overload, especially where the young person may already struggle to form relationships and trust professionals. Support has the most impact when it is delivered via the strongest relationship.

“I'm not precious about my role in young people's lives. I just go with whatever works best for them. I'm happy to be in the background, they know I'm there. If there is another person that they feel they can open up to. [...] It doesn't have to be me, it has to work for them.” – Social worker

The strongest relationship **Stuart** had was with his youth justice worker, who prioritised Stuart’s experience, listened to his story and gradually established trust.

“What I learned was, it was much more important to listen to his story. Because actually, once you build trust, which is the big thing, over time, he would then share his story with you of what he'd experienced. And then it came much more from him instead of talking about things that weren't really relevant to him, like going out of county.” – Youth Justice Worker

Sometimes, case workers needed to think ‘outside the box’ in order to engage young people in interventional work – often because of their complex needs.

When **Stuart** began to pull away from services, case workers made him collect his allowance in person from their office. That created a regular opportunity for practitioners to engage with Stuart and check on his welfare.

Practitioners working with **Tom** noted that his long-standing group of friends were also involved in drug dealing, possibly through county lines gangs. However, they couldn't simply break up the group so Tom and his friends were referred to Groundwork, a specialist service that pairs mentors with lived experience of gang involvement with young people at risk of exploitation. Engaging groups collectively in this way can help a network of friends encourage each other to change their outlook and perceptions.

Dealing with disengagement

The techniques outlined above highlight examples of best practice from local authority case workers in engaging young people involved in county lines to educate and develop skills and resilience. However, the case workers interviewed for this research frequently expressed frustration that young people refused to engage or take the work seriously. Some felt that this was a deliberate choice; it limited the scope and effectiveness of work that could be delivered.

“If [...] he wanted to let people in, then somebody would be able to engage him. But yeah, it's this barrier, this maybe conviction at the time that he doesn't need anybody's support. He won't allow anybody into his world. That he wants to sort it out himself [...] but that sort of stopped him from anybody making any progress.” – Social worker

In some cases, it was felt that the influence of the young person's family was a significant factor in how easy they were to engage. Where the family distrusted support services and authorities, delivering work with the young person could be an uphill battle. However, where families were proactive in engaging with case workers, and wanted to work collaboratively to safeguard and protect their child, the impact of interventions was often more significant.

“If the main caregiver doesn't trust the people, then why should he trust the professionals because in their eyes, we're just interfering and not really trying to help and support them” – Social worker

However, practitioners indicated that families often didn't understand the risks and realities of exploitation, the signs to look out for and what support was available.

“Initially mum thought, he’s out with his friends, he’s okay. If he was out of sorts, if you know, he was presenting as quite angry [...] she wasn’t quite sure whether this is teenage behaviour, [...] or is there actually something, something else that’s going on?” – Duty and Assessment Team

It is important that families or caregivers are included in any targeted work on exploitation, as they have the potential to be an important protective factor for young people involved in county lines. If families feel equipped to spot the signs of exploitation and are confident in, and comfortable with, the police and local authority response, they will be in a better position to proactively safeguard their children – for instance, by reporting missing episodes.

“We built up a good relationship, me and the leaving care worker and the family, whereas a lot of other professionals had quite negative views of them as a family. And we didn’t really go along with that. We wanted to spend time with them, listening to them, talking with them, you know, valuing what they thought.” – Youth Justice Service

The impact of trauma on engagement

All of the young people in the research sample have childhood vulnerabilities and many have experienced significant trauma both before, and as a result of, their involvement in county lines. The refusal of many to engage with local authority case workers may therefore be more appropriately understood as a trauma response. For a young person who has consistently been let down by family, moved through care and had negative interactions with the police, trusting professionals may, understandably, be difficult. Direct work around exploitation often encourages exploited young people to reflect on their own position as a victim, a reality they may struggle to come to terms with and which may feel disempowering.

“Young people don’t always want to accept that they’re vulnerable, or they’re the victim – particularly with young males. So I think in some respects [Liam] did acknowledge it. But then also, I think there was a part of him that kind of still believed it was his choice. He wanted to make money. So it was his decision.” – Exploitation Support Worker

“I think [Ben] had the capacity to understand a bit about what was happening. But as I said, in the context of being exploited, you know, you could argue that not all of

it was completely understood. In fact, I'd be adamant that it wasn't." – Specialist Service Worker

Local authority case workers agreed that the direct work they delivered to the boys in the sample did not have a significant impact on what happened to them or their understanding of exploitation risk:

"You have to be realistic sometimes, and sometimes young people just don't want to work with you, they work with enough professionals, and they don't want to meet another one, they're sick and tired of it, or they just don't want to do it. "

- Specialist Service Worker

"After a while, he was able to see that, okay, maybe he is being used here. [...] But at the same time, he liked the thrill of it. So even though he could acknowledge the risk, he was still saying, 'Okay, well, if I do it, it's fun'" – Youth Offending Team worker

Where young people did appear to disengage from county lines activity, other factors – such as improved family relationships or securing a stable job – appeared more significant than direct work around exploitation risks with practitioners.

Lack of escalation in support packages

Part of the issue is the absence of any escalation in support offered. Many of the 13 boys were already receiving direct work around exploitation before the incident and the work continued afterwards – largely unchanged. In general, arrests, NRM referrals and other 'teachable' moments did not prompt a significant gear-change in the support offered by local authorities – often because all direct sessions and referral options had already been exhausted. This meant that, for several of the young people, once all direct work around exploitation had been completed, services were closed to them – regardless of whether or not the exploitation risk had actually reduced.

A tick-box approach to the delivery of exploitation support that cannot adapt to meet the dynamic circumstances of a young person's life, or acknowledge the likely trauma that informs their (dis)engagement, risks retracting support prematurely and increasing the likelihood of re-exploitation.

The role of the National Referral mechanism

As discussed in Chapter 1, it would be expected that any child or young person arrested in relation to county lines activity and who is suspected of being a victim of exploitation should be referred to the NRM. They should receive a 'reasonable grounds' decision within 48 hours, but they typically wait over a year for a 'conclusive grounds judgement' from the single competent authority. Given this level of drift and delay, and with no guarantee that a conclusive grounds judgement will prevent them from being prosecuted, what is the view of local authorities on the NRM?

Most professionals who understand why young people are referred to the NRM see it as a way of reducing the severity of the treatment they receive in the criminal justice system. **John's** Social worker said his positive NRM was considered when he went to court for an offence or because of a breach. She believed he had only been in custody for a few days because of a conclusive NRM judgement.

But some local authority staff are concerned that the NRM is used as a 'get out of jail' free card. One worker involved in **Stuart's** case felt that because the NRM process was seen as a way to reduce the sentence a young person might face, it had created a spike in referral numbers to such an extent that there were now significant time delays in receiving a conclusive grounds decision.

Another felt that young people involved in county lines that she worked with were using the NRM process as "a protection" and "safety net".

"Obviously, [NRMs are] used, you know, to give the courts an understanding around what's happening for this young person and to try to dilute down any criminal charges for that young person. And so, you know, you won't see an immediate change...But it is always something that we do, an NRM, when we're concerned that a young person is going to be in trouble." – Exploitation Worker

"For me, the NRM all it means really, is that they're more likely to get off any court sentences. There's nothing else". – Youth offending team worker

"There seems to be this thing now where the NRM is almost like a get out of jail free card. [...] It's really annoying, because there are clearly cases where it needs to be used.... I've got cases that are being delayed because we're waiting for an NRM referral and NRM decisions, and they're not going to the CPS because the police want to wait for the NRM decision."

The perceived abuse of the NRM is seen by local authority practitioners as causing delays in the outcomes for young people who need closure in order to move on, without a criminal case hanging over them. One police officer told us he he had an ‘unwritten agreement’ with the local authority exploitation manager that they will make an NRM referral only after a strategy meeting or a professional discussion:

“...we will only ever submit if that child is likely to be charged with an offence that they'll appear in court. Now I know that goes against what the NRM is for. But it's a practical measure, that we can focus our attention on the children and the real safeguarding because as you know, the NRM it just defaults to safeguarding back to children's social services”. – Police officer

Some professionals were concerned that a positive NRM result limited the extent to which a young person ‘learnt their lesson’ as their criminal justice outcome was less intrusive than it might have ordinarily been.

“I can understand the reasoning for the NRM and it is helpful in terms of in the court cases not criminalising them, but in the same breath, like when you get kids like Sam if you're talking about risk and outcomes and potential of what could happen and that this is law, when they are then when their cases are dismissed because of the NRM, it kind of gives conflicting messages.” – Youth Offending Team Worker

Local child criminal exploitation panels?

In Chapter 1, we outlined serious concerns which had been raised regarding the operation of the National Referral Mechanism in relation to children and young people suspected of being victims of criminal exploitation, specifically the single competent authority (‘SCA’) function.

Concerns include:

- Extensive delays between the granting of ‘reasonable grounds’ and ‘conclusive grounds’ (448 days on average as of Q1, 2022). A reasonable grounds judgement does not automatically imply an enhanced level of protection while awaiting an outcome. Neither does a conclusive ground judgement.
- Regional Home Office officials who staff the SCA are not required to have specific expertise and often reach judgements on poor quality information which is out of date.

- The SCA cannot cope with the increase in demand for investigations and decisions, fuelling delays and reducing incentives for professional curiosity.
- First responders are often confused or sceptical about the role of the NRM, increasingly regarding it as a tick-box exercise.
- The courts no longer consider that a ‘conclusive grounds’ judgement from the SCA meets the threshold of expert evidence at trial.

These features of the NRM in practice place the lives of potential victims of CCE on hold as they await a decision on how a criminal case may progress or be resolved. This drift and delay provides a window of opportunity for exploiters to re-exploit victims in order to recoup ‘debts’. A lot can happen to a vulnerable adolescent during this period, especially when no significant support package is put in place.

A Home Office pilot scheme transferring the SCA function for child exploitation cases to a selection of local areas, with police forces and local children's services making decisions jointly, has provided the template for a radically different and potentially more effective model.

Our ‘deep-dive’ research with the Islington and Camden pilot³¹ found decisions for vulnerable young people were made with far fewer delays. The quality of decision-making and case planning improved because agencies shared information more quickly.

How does the NRM localisation pilot work?

- Local authorities receive referrals and ask professionals for information.
- In Islington and Camden this includes a Social worker, social work manager, youth offending team and integrated gangs team. They also reach out to police and health services.
- Monthly local panel meetings hear about five cases. Panels can make a ‘reasonable grounds’ decision and a positive (but not a negative) ‘conclusive grounds’ decision on the same day, if there is enough evidence.
- If the panel is not in agreement, a case will be deferred pending more information, but delays never extend beyond a 45-day maximum reflection period.
- Decisions are quality assured by the Home Office.

³¹<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>

Under the terms of the pilot, the local decision-making panel should include social services, police and health representatives – the ‘three legged stool’ of child safeguarding. For the Islington and Camden pilot, the panel includes heads of safeguarding and youth offending teams; police representatives include the specialist leads on modern slavery and exploitation.

By bringing senior representatives from specialist teams onto the panel it developed a role beyond the remit of SCA decision making. The panel believes that the referrals it sees represent a small proportion of the likely level of exploitation and it began to identify potential cases before an arrest, so that enforcement action or prevention measures could be taken.

Findings and recommendations

The Independent Review of Children’s Social Care (final report, 2022) argued that services for children in need of support and protection in the UK are still geared around familial risks and have failed to adapt to the impact of potential harm outside the family and outside the home. We see evidence of this in county lines and CCE in the lack of tailored, effective interventions for vulnerable adolescents and the broken ‘market’ for residential accommodation. Police officers we spoke to doubted that treating young people arrested in county lines as victims of exploitation is in the interests of the child let alone the wider public if they are simply run back through the wringer of the same services which have already failed them.

“A more tailored and coherent response is needed to harms outside of the home, like county lines, criminal or sexual exploitation or abuse between peers. We recommend a bespoke child protection pathway – through a Child Community Safety Plan – so that the police, social care and others can provide a robust child protection response”. – Final report of the Independent Review of Children's Social Care, 2022

Our research reveals that local authorities, often with the best of intentions, make what appear to be serious errors in safeguarding against future risks of harm and re-exploitation. The most glaring example is forcing inappropriate care placements upon vulnerable adolescents. Underlying this and other problems we have identified is the need for more robust information-sharing between agencies, particularly the police, health services and children’s social care, around a young person’s vulnerabilities and the people they mix with.

All too often, children and young people who were known to services prior to exploitation, are pushed back through the same child protection processes which failed them in the past. Practitioners and case workers, even those in local authorities who have identified and attempted to respond to CCE risks, do not appear to believe that the work they are required to complete with young people will improve their circumstances. In the common scenario in which an exploited young person does not wish to engage with services or to acknowledge their vulnerability, our research indicates the need for new responses which are individualised, dynamic and trauma-informed, but also backed by police and the courts.

Exploitation risks should be seen in the wider context of a young person’s life, rather than dealt with as part of a response to an ‘isolated’ incident. We cannot expect a police force arresting a young person involved in county lines to do this. Greater use of specialist teams would help, as would training for CID to change their culture to think beyond investigation and prosecution in relation to teenagers. They are not required to reach that level of understanding and do not have the right tools to go beyond viewing who **the** victim is. The home local authority for each young person should act as convenor working with other agencies and the individual themselves and their parents and carers, to oversee a crisis response. This should provide a window for exiting gang life , as well as medium-term intensive support based on shared intelligence and planning, and longer-term support built on stronger relationships.

Key finding	Recommendation
<ul style="list-style-type: none"> ❖ When a child or young person is identified as a potential victim of county lines, they need a crisis intervention which is based in their local area. 	<ul style="list-style-type: none"> → Newly localised single competent authority panels should be recast as child criminal exploitation panels in order to share intelligence and agree joint plans for young people at risk. The panels should include senior representatives of specialist teams from children’s social care and local police. → OFSTED should include local authority responses to CCE in inspections.
<ul style="list-style-type: none"> ❖ Local areas are failing in their ‘sufficiency duty’ to provide appropriate residential placements for vulnerable adolescents who have experienced exploitation. ❖ ‘Exiling’ young people exploited in county 	<ul style="list-style-type: none"> → When children are moved to a placement in a new area, they should be dealt with as a priority and receive immediate support for their physical and mental health needs → The DfE should trial intensive locally-based

lines away from protective relationships with the and services needed to rebuild their lives.

alternatives for care placements, based on 'remand fostering' where older youth workers and community figures are paid a premium to keep potential CCE victims safe, with police support.

→ Out of area placements 'at distance' (20 miles or more) from home should not be used unless it is the express wish of the young person

Conclusion and recommendations

The experience of the 13 children and young people in our research sample illustrates that when a child or young person is arrested for suspected involvement in county lines drug dealing, three processes run in parallel:

- (i) a criminal process, for the offence for which they were arrested;
- (ii) a civil process, through the NRM, in effect, the diagnostic tool for CCE;
- (iii) a child protection and safeguarding processes under the Children Act (1989).

These three processes are individually and collectively of great significance to the lives of the young people concerned, and yet it is the norm that they are considered in isolation. This was also the case in the CSE scandals prior to a national response to high profile grooming scandals, led by the Department for Education (then known as the DfES). However, the national response to county lines has been and continues to be led by the Home Office. It naturally follows that this response is characterised by enforcement and a search for victims and perpetrators, as the Home Office lacks any delegated controls over child protection or safeguarding policy. However the personal histories of the 13 children in our sample identify multiple missed opportunities for prevention and intervention in services funded and directed by the Department for Education.

A lesson from history : comparisons between the responses CSE and CCE

The Home Office's definition of child criminal exploitation was published under the long shadow cast by prominent child sexual exploitation scandals. Damning reports from Baroness Louise Casey, Professor Alexis Jay and Ann Coffey criticised the way police forces and local authorities responded to the organised sexual exploitation and abuse of vulnerable young women and girls by groups of men, blaming victims for being culpable for their exploitation and ignoring the concerns of families. There are notable similarities with CCE. Both are characterised by adults targeting children and young people, the majority of whom have vulnerable home lives, in order to traffic and exploit them. Both categories of exploitation have been enabled by an ambivalent attitude towards victimisation and the chronic inability of police forces and local authorities to cooperate across professional and geographic boundaries.

Rather than applying the lessons of CSE to CCE and devising national, regional and local approaches to form child exploitation, the national response to CCE has been inadequate. It has relied upon retrofitting existing processes and programmes, such as the NRM, rather

than adopting a new national strategic approach to address the role of grooming and exploitation.

As this report demonstrates, the notion of victimhood in county lines is complex and fluid. A young person may be a victim of exploitation, a willing participant in drug dealing or an exploiter of others. We may view a 14-year-old boy who has inserted so much heroin and crack cocaine inside his body that it could kill him, before travelling to a dealing base to sell the drugs on the orders of another person, as a victim of child criminal exploitation. But that boy may have internalised the harms and abuses they suffer as ‘part of the game’, which might be reflected in their social media profiles or the messages they send. Is it in the public interest to charge them with drug offences or to have a rule to always decline to request charges for drug offences?

A supportive but robust response to CCE victims

We recommend in this report that any child 100 days shy of their 18th birthday or younger arrested in county lines should automatically be regarded as a potential victim of CCE unless there is clear evidence to the contrary. This is not a soft option. We have proposed an intensive local crisis intervention closely involving senior specialists from the home police force, and suggested that a form of safeguarding order should be used to protect children and young people from re-exploitation (see p. 55-56). This approach will allow police forces to concentrate stretched resources on identifying the perpetrators who criminally exploit children and flood their towns with Class A drugs; closely aided by the Crown Prosecution Service. This would enable police forces to make more effective and efficient use of digital forensics.

There are some key questions which remain unresolved in this report but which we consider of crucial importance to improving the national response to county lines and CCE.

Firstly, given the evidence of ‘devolution’ – ‘franchise’ models and even those resembling multi-layered marketing (drug lines operated remotely but ‘staffed’ locally) – can we ‘future-proof’ responses to CCE if gangs, OCGs, and line operators are taking tactical decisions to use children local to their dealing bases? If children and young people who have been remotely groomed and exploited appear to be part of the local drug dealing market then identification becomes more challenging. Perhaps then it is time to retire the term ‘county lines’, and focus instead on CCE in dangerous and volatile drug dealing lines. This is an important question which should be addressed by future research.

Specialist police forces working on teams tackling counter terror and CSAM have access to a wide range of powerful technological tools which can be used to gather intelligence on perpetrators at great pace – catching criminals, protecting victims and potential victims. Despite the growing threat of CCE, and the camouflaging effect of devolving more and more elements of what we call county drug lines, our research shows that officers at force-level who conduct operations to tackle county lines and prevent CCE on a daily basis have a fraction of the necessary resources to do the job in the way that the government has requested. This prioritisation represents a political choice made by ministers.

Second, there is the role of the ‘alpha victim’, a term coined by police forces to describe young people who experience exploitation and go onto exploit others, either in order to escape their own exploitation or to avoid violent reprisals for the loss of drugs or cash in a previous incident, usually an arrest. Police officers have repeatedly told us that the journey from being a victim of exploitation to exploiting others is often shorter in duration than people realise. A senior law enforcement figure indicated that this period is becoming shorter and exploiters are getting younger.

Third, there is the issue of plugging. During our research we have not encountered a single case in which criminal charges have been brought against a line operator or a gang member over the insertion of Class A drugs in a child’s rectal passage, sufficient to kill them, or painful removals when ‘plugs’ become lodged inside the body of a child or young person. Where plugs become lodged, the extraction process is humiliating and traumatic if conducted by medical professionals – and potentially dangerous if attempted by members of a criminal gang. The NHS should review cases in which children young and people have unexplained internal injuries consistent with plugging.

The stakes for children and young people exploited within county lines remain high. The impact of the inconsistent responses that children and young people receive from arresting and home police forces and the lack of robust protective safeguarding from children’s care in local authorities is a potential cause of significant harm. Unless this is addressed the cycle of exploitation will continue and the cycle will continue.

Appendix 1: Research methods

Our research methods were selected to enable us to answer two key research questions:

(i) How should it be decided whether children and young people involved in county lines be treated as victims, willing participants in drug dealing or as groomers and exploiters themselves?

(ii) How should children and young people be effectively safeguarded and supported to reduce the likelihood of re-exploitation and further harm?

Scoping

- We began our project by holding roundtables with both national and local project stakeholders to explore and refine our research questions and identify key lines of enquiry for our fieldwork.
- We conducted a limited review of relevant data and literature focussed primarily on official publications and recent case law.
- We conducted a limited content analysis of the portrayal of county lines within a selection of social media accounts operated by police forces.

Fieldwork

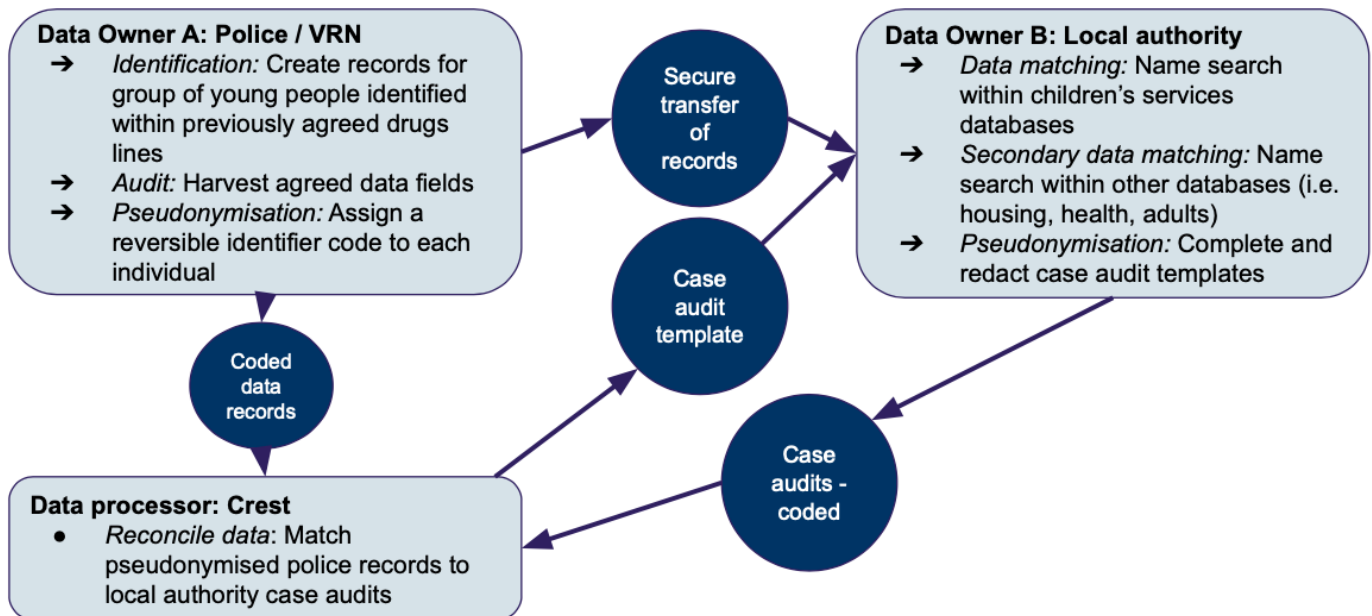
- Our fieldwork was centred on identifying a sample of cases of children and young people identified within county lines for analysis. To achieve this we partnered with two police force areas.
- These areas were selected as ‘dealing bases’.
- We requested that the two police forces within the study select 8-10 children and young people who had been identified as having been involved in county lines. The most significant selection criteria was that the ‘identifying incident’ should not be considered sub judice; i.e. no criminal trial or appeal pending.
- Our original sample of twenty cases was reduced to 13 as the home local authorities of seven boys were not able to supply the agreed data in time for publication³².

³² See Appendix 2 for a detailed note on barriers within data sharing.

Data management

- Data on all cases was pseudonymised by police forces and local authorities, and shared under rigorous data processing impact assessments and data sharing contracts. Data was cleansed of any identifiable information.
- As shown in fig 5 below, cases were dealt with pseudonymously. Police forces assigned a pseudonymous code to each young person and completed a data audit template we supplied.
- Police forces were able to share pseudonymised case audits securely with Crest, and to share the names of the individuals with the home local authorities of the child or young person.
- Home local authorities completed a second data audit form supplied by Crest for each child and young person, before reapplying the original pseudonymous codes and sharing them securely with Crest.
- The project team reconciled the two completed case audits for each case. In this way, at no point did the Crest team hold identifiable information.

Fig 5: Data management system



Interviews with police officers and local authority practitioners

- We interviewed 37 police officers and local authority practitioners familiar with the cases to gain a fuller understanding of the lives of the boys prior to the identifying incident, exploring how they came to be considered as victim, willing participant or groomer and what the consequences had been for them and their families in the longer term.
- We did not approach the young people within our sample, or their parents/carers or peers to take part in the project. This is because of:
 - (i) A significant risk of re-traumatising victims through questioning
 - (ii) A significant risk that a number of families would seek to exclude themselves from the research, or at the very least to refuse an interview. This would skew our findings towards the experiences of the more co-operative young people and families, giving their experiences undue weight.

It is important to note that the level of detail available for each case is dependent on the records kept by the partner police forces and local authority areas, and the officers and practitioners still in the employment of each agency. This presents some limits to the comprehensiveness of each case study; for example, when a young person turned 18 and was not in receipt of leaving care support, local authority records ended. Similarly, in some cases, practitioners or police officers involved in the incidents were no longer in the employment of their respective agencies and so could not be contacted for this research.

Following analysis, case studies for each young person were written in long-form, bringing together information received from the police and local authority. Each case study begins with the 'identifying incident' and the immediate response to that incident. Each study then moves backwards in time to consider the circumstances leading up to the incident, and early indications of exploitation or involvement in county lines, as well as pre-existing vulnerabilities. This approach was taken to replicate how a police officer making an arrest might initially process information on a young person – first considering the situation at the point of arrest, before receiving intelligence on the young person's exploitation risk or prior arrests. All names used in the case studies are pseudonyms, and locations and other identifying details have been removed. Please note that the police forces referenced in the case studies are not necessarily our partner forces as other police forces were involved in the incident response in several cases. These case studies are referenced throughout the body of the report, and can be found in full in an accompanying document on the project page.

Other publications within this research project

Crest customarily publishes research outputs episodically during the timeline of our independent research projects in order to allow space to explore selected issues in greater detail and ensure that our work is relevant to contemporary public policy debates. We have previously published two long reads responding to a rapidly evolving national policy context around county lines, including the Government’s ten-year Drug Strategy, launched in December 2021.

In July 2021, we published a long-read providing a deep-dive into ‘Project Adder’, a Home Office initiative which aims to tackle the ‘demand side’ of county lines. In December 2021, we published a long read focused on the role of the National Referral Mechanism, including an examination of the ‘NRM localisation pilot’ – an ongoing trial in which the single competent authority function has been delegated from regional Home Office outposts to a selection of local areas. These publications are available on the Crest website, along with a note of the roundtables we held to launch the project³³.

³³ Whilst elements from within these publications are reproduced within this report, readers are likely to find it useful to read these two publications.

Appendix 2: Barriers to data sharing

Statutory agencies such as police forces, local authorities, schools and health providers record and manage ever more data on our lives. The tools to share and analyse this data exist and are developing rapidly. Two of the Home Office's flagship Violence Reduction Units have achieved 'interoperable' data between multiple agencies. The potential beneficial uses of personal data by public services are limitless.

Yet many of the agencies working with the most vulnerable people in society struggle to share data and information for a variety of reasons. This can cause drift and delay, and failure to take responsibility for the welfare of individuals. Naturally, concerns around privacy and data protection are a significant barrier to data and information sharing, as are a lack of technical capabilities in agencies of the local state in terms of both technological and analytical capabilities.

In 'Borderless Safeguarding?'³⁴ Crest reported on the behavioural and practical barriers faced by police forces and local authorities sharing critical information on vulnerable young people, especially across geographical and professional boundaries. In this research, data sharing difficulties presented a significant barrier, reducing our original sample of twenty children and young people to 13.

Even when senior leaders in local authorities had agreed to share data, gaining access to the information required was often a lengthy and difficult process. There are a few reasons for this. Firstly, Children's services Directorates appear to lack the necessary autonomy or authority to navigate data sharing, in the shadow of GDPR. Secondly, the Corporate data managers to whom Children's Services defer do not sufficiently understand children's services in order to progress requests. Thirdly, there is a lack of capacity within both data management and analytical roles at local councils. These factors in combination cause unnecessary and avoidable friction, impeding information sharing.

The Government has repeatedly acknowledged frustrations on barriers to data sharing. The Ministry of Justice have launched 'Better Outcomes through Linked Data'³⁵, (BOLD) using strictly de-identified data from multiple agencies to explore support provided for those with complex needs. One of the four focus areas is supporting 'Victims of Crime'. There are a handful of other similar experiments running at national level.

³⁴ <https://www.crestadvisory.com/post/vulnerable-children-in-county-lines-drugs-networks>

³⁵ https://www.gov.uk/government/publications/ministry-of-justice-better-outcomes-through-linked-data-bold?utm_medium=email&utm_campaign=govuk-notifications-topic&utm_source=14d695eb-fc3c-434f-99de-2bedf7b200b5&utm_content=daily

The Home Office, who lead the national response to County Lines, may wish to consider whether clearer guidance and direction on data sharing is required for agencies at case level and event level.