

Combating Child Criminal Exploitation

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Introduction

This report examines the problem of child criminal exploitation (CCE), the phenomenon of children being groomed into committing crimes, including drug offences and violent crime. Much of this criminal activity is linked to the supply of drugs along county lines, which is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines. Gangs use children and vulnerable people to transport and hold drugs and money.

This report looks at attempts by Government and public services to deal with the exploitation of children by organised criminals. It concludes with recommendations that are based on the evidence given by a panel of experts and practitioners combatting child criminal exploitation, as well as academic research and conversations with stakeholders.

In 2021, 30 teenagers are reported to have been killed in London alone¹. In Newham, cases of children who have been seriously harmed as a consequence of being exploited by organised criminals continue to be raised by Lyn Brown MP and Sir Stephen Timms MP, whose constituencies cover the area of Newham.

The current approach by public services is not working well enough, with child victims of criminal exploitation not being identified and or adequately supported at an early stage. While many practitioners including police officers, teachers, social workers and others have gained an increasingly strong understanding of child criminal exploitation over recent years, this is not the case across the board. A lack of clarity over how to identify levels of risk, and the specific steps that should be taken by each service when a child in need of protection is identified, causes confusion and delays in providing protection that can prove deadly.

This is exacerbated by the immense pressure on public services, schools and local authorities to fulfil their duties while under-resourced. This means that cases of exploitation are often missed and that even when the right referrals are made early, the specialist support required cannot be provided by partner agencies in a timely or consistent manner. The collective failure of society and Government to protect children from CCE is contributing to a terrible toll of murdered children, traumatised families and communities, and ruined lives.

To draw attention to the need for national action on the problem of child criminal exploitation, in 2021 Lyn Brown MP introduced a Bill which proposed core policies to improve the response from Government. On 16 June 2022, Lyn Brown MP and Sir Stephen Timms held a series of roundtables in Parliament, where panels of experts gave evidence and made recommendations on best practice for protecting children from criminal exploitation, assisting those who have been criminally exploited, and targeting the business model of criminal gangs using children for profit. This event was the primary source of evidence for this report. Lyn and Stephen wish to again extend their thanks to all of those who gave the enormous benefit of their expertise.

This report focuses on exploitation that involves children committing criminal offences as a result of having been groomed by criminals who seek to exploit them for profit. In addition to the county lines drug trade and associated violence and weapons offences, children can become involved in robberies, theft and other offencesⁱⁱ.

The grooming of children can occur in many different spaces: at high streets, bus stops, shopping centres, fast-food premises, online, or even in school. The groomer might be an adult or a – typically older – child who has been groomed themselves. It is not unusual for children to be groomed into joining gangs that work in a supply chain run ultimately by organised criminals at some distance from the day-to-day exploitation and violence.

The use of children by these gangs has led to children committing various crimes including serious violence against other children. The number of children committing recorded first time offences involving the possession of a weapon has been rising over the decade up to 2021ⁱⁱⁱ. Experts report that the majority of serious violence against teenagers is committed by teenagers.

Children being criminally exploited do not always understand or acknowledge that they are being exploited. In this, among other ways, CCE is similar to child sexual exploitation. Most prosecutions for the ‘modern slavery’ offences that substitute for a specific CCE offence are secured through the use of digital communications evidence that shows that exploitation occurred without relying on testimony or cooperation from the child victim(s).

The need for change

Where teachers, social workers and police follow their individual roles without a properly resourced, joined-up approach, there can be very damaging outcomes. One story relayed by a stakeholder illustrated this point.

A child was facing difficulties at home, including domestic violence from his father. The child went to school with bruises. The school safeguarding lead reported this, and, in turn, the police were informed. The police visited the home, saw that both mother and child were bruised, and immediately removed the child from his home.

The police liaised with social services. However, the judgement was ultimately made that the case did not meet the threshold for child protection, and social services returned the child to his home.

The child’s father believed that his son reported him to the police and subjected the child to further violence. The child then truanted from school, as he did not want his new bruises to be reported to the police by school staff.

His absence from school meant that he was outdoors in his neighbourhood in spaces where there is no effective child safeguarding. He was groomed by criminals, who

offered him a sense of belonging outside of home and school, which are not safe spaces for him. The child began carrying a knife and eventually got into a fight with another child. He ended up in a Young Offenders Institution.

An early and holistic intervention with the child's family, rather than a series of disjointed and inconsistent individual responses from agencies, could have prevented this child's grooming, exploitation, criminalisation, and involvement in violence.

Criminal Justice response

The role of the police

Police services have a core role in both delivering justice for victims of violent crime and child exploitation and defeating the business model of criminals who exploit children, usually as part of county lines drug chains. Over time, police services have taken on additional broader roles, including in safeguarding child victims, which requires responding to children in trouble in a way that understands the trauma they have likely experienced. In this way, police services have an essential role in referring children to the right support.

The police in London have had increasing success in targeting those involved in county lines over recent years. Operation Orochi, the name given to the Metropolitan Police's County Lines response, has been successful in making arrests and enabling prosecutions of criminals. 950 lines originating from London have been reported closed, with 2000 people arrested and 2800 charges brought, and an arrest to charge ratio of 95%, 85% early guilty pleas, and a 97% conviction rate.

While the vast majority of enforcement work to protect children from CCE is and can only be done by local police services, targeting the organised criminal networks that ultimately facilitate child criminal exploitation at a higher level can require highly specialised methods, resources, and expertise. This is partly provided by specialist regional organised crime teams alongside the National Crime Agency, which is critical in enabling disruptions and prosecutions of those responsible for importing and wholesaling the Class A drugs that are the overwhelming source of profit for those who criminally exploit children, and the weapons that are often used in terrible violence against and by exploited children.

There is a clear recognition among police experts that the problem of both identifying and supporting children who have been criminally exploited cannot be dealt with by the police alone. A well-resourced multi-agency response is needed to identify and safeguard the children at risk of, or already subject to, criminal exploitation. It is clear that a range of different child protection issues need to be considered in an integrated way in order to best identify risks, including missing cases, child abuse including parental violence, and reports from schools, healthcare providers, social services, etc.

Community policing

In order for police services to perform these essential roles effectively, they must have trust from the community. This is not only because community trust enables intelligence to be shared that can lead to safeguarding action and investigations, but equally because when trust in the police is at very low levels, the resilience of children to CCE grooming is reduced and,

where grooming has already occurred, their vulnerability to further exploitation is increased. For example, if children believe that police officers could take advantage of anything they say to pursue charges against them, they will not be willing to speak about those who have exploited them. Crucial diversion opportunities, discussed further below, are less likely to be accessible to exploited children if they do not trust the police, courts or other professionals.

Genuine engagement with the community is important to build trust among the public, especially communities where there is low confidence in the police. A wide range of activities can help to build such trust if they are consistent, performed on the basis of confident and respectful relationships with young people, and working in genuine partnership with already trusted local community organisations and leaders. These can include, for example, football programmes bringing together police officers and young people, and regular town hall style meetings between the local police service and the community. Experts gave evidence that it is important that the community 'owns' these activities through full involvement in setting the parameters, that police leaders can act with humility when engaging with the community, and that activities can continue on a regular and predictable basis over time. Confidence-building will not happen quickly.

Specific police tactics and practices need to be continually reviewed for their impact on community trust and confidence. Experts were clear that disproportionate use of stop and search within particular communities damages trust among young people. In London, this is a particular barrier to trust and confidence in the Metropolitan Police from young people from Black communities. Improved community involvement and accountability in relation to the use of police tactics and practices can help to repair trust and confidence.

Prosecuting criminals who exploit children

Since November 2019, law enforcement efforts to tackle County Lines across England & Wales, via dedicated County Lines Taskforces, have resulted in the closure of over 2400 County Lines, over 8000 arrests & over 9500 charges. High arrest/charge ratios, early guilty plea and conviction rates have been seen throughout the enforcement efforts.

There is concern, however, that the harm to children and their communities caused by the exploitation of children in criminal business models, is not being adequately reflected in charging and sentencing decisions. The Modern Slavery Act 2015 was not originally intended or designed to tackle county lines CCE and securing evidence that a child has been specifically trafficked by a suspect or organised crime network to the point where it reaches an evidential threshold against the existing offences in the Act can be very difficult. Thus, while the Metropolitan Police Service's specialist unit has enabled over 2800 charges to be brought in total, only 57 have been brought under the Modern Slavery Act in relation to CCE.

Police experts gave evidence that the courts do increasingly accept that the use of children in the facilitation of crime constitutes an aggravating factor for sentencing. Some police experts do believe that the use of children may be declining. However, it is not clear that such strengthened prosecutions and sentencing are taking place on a scale large or sustained enough to provide a genuine deterrent to those who exploit children as part of their business model. Ultimately, without a large gap, in practice, between punishments for those who commit drugs supply offences while exploiting children as a means, and those who do not, the law will not provide effective pressure to end the CCE business model. The absence of a clear definition of child criminal exploitation in statute is probably playing a role in failures, on the part of prosecutors, to push consistently for the exploitation of children to be applied as an aggravating factor during sentencing.

Police experts have repeatedly given evidence that prosecutors will sometimes opt to drop charges for CCE, even where there is evidence that could secure a conviction, on the basis that a conviction for other offences such as drug supply is more certain, and less likely to require a trial. This is an unacceptable state of affairs and reflects the wrong priorities at a systemic level. The criminal justice system should recognise that the harm done to children and communities by CCE deserves to be made a specific priority. Securing these prosecutions is in many cases far more important than further 'business as usual' prosecutions of drug supply offenders.

One further step that has been suggested would be a statutory change to introduce a register of child criminal exploiters, on the model of the sex offenders register. This would help to underline that CCE is a form of child abuse, and to prevent people who continue to be a danger to children from gaining easy access to further children to groom and exploit. On the other hand, some experts warn that there may be cases where children are groomed into committing CCE offences, including grooming other children, as part of their own exploitation. In such cases, inclusion on a register could unfairly create further barriers to moving on with their lives for CCE victims who have been criminalised.

In terms of mitigation for children convicted of drug offences, the exploitation of their vulnerability by others can be used as a mitigating factor under existing sentencing guidelines, as can coercion. However, experts have made clear that children may not be able to articulate that they have been exploited or coerced and, in addition, they may not present as sympathetic victims to people who do not fully understand the context. A clear and specific mitigating factor for child victims of criminal exploitation could focus the minds of lawyers and judges when it comes to charging and sentencing decisions for child victims. This would be reinforced by the cultural changes recommended throughout this report.

Children in contact with the police

The commission of criminal offences by children who are victims of exploitation, most of which are non-violent offences, is leading to their criminalisation. There is a clear awareness among experts that the criminalisation of these children does not effectively prevent violence and does not stop the continuation of criminal business models which use children as expendable facilitators of crime. A number of panellists, including police specialists, noted that prosecutions and custody for children in these circumstances are 'criminogenic' - they create or deepen the conditions that make further crime likely.

The criminalisation of child victims of exploitation often has life ruining consequences, with children ending up in Young Offender Institutions or prison, and with significantly reduced educational and employment prospects. The children's families and wider communities are also harmed.

We were told of one case where a child was kidnapped by a gang and committed various offences over the course of this exploitation, which went on for years. After making admissions to police, he was charged, rather than treated as a victim of criminal exploitation. This led to him losing the job he was about to begin. This case suggests that clear improvements are needed in police practices about how children who have committed criminal offences after being groomed and exploited are protected, and not criminalised. It is clear, based on evidence given by practitioners, that cases like this are far from rare.

Police leaders emphasise a potential risk that completely moving away from a criminal justice response to breaches of the law by exploited children could paradoxically put further children at risk. This could occur if criminals know that if they use children to commit their crimes, the police will not get involved. This report does not recommend moving away from a criminal justice response to offending by all exploited children, but instead changing the criminal justice response to focus more heavily on the offending of the exploiters and providing a more appropriate form of justice that recognises the child's circumstances and the intensive support they will need to break free from crime.

Children have a specific defence in the Modern Slavery Act 45(4) against criminal charges where the crimes they have committed were a direct consequence of their being a victim of slavery or exploitation. Police experts indicate that procedures around the application of this defence could be improved, and that leadership from Government is needed to enable change in this very sensitive area of law. The provision of a statutory definition of CCE could help to increase the accessibility of this defence.

Current national guidelines from the NPCC Modern Slavery and Organised Immigration Crime Unit direct the investigator into the child's alleged offending to also investigate the child's exploitation, however there can be significant barriers to the efficacy of this. One is that in county lines cases the child's offending will often have taken place in one geographic area (e.g. Ipswich) whereas they were exploited primarily in another (e.g. London). Another is that having

the same investigator and combined interviews – effectively treating the child as a victim and a suspect simultaneously – makes productive cooperation by the child with the investigation into their exploitation less likely.

An alternative model, already in use in the Metropolitan Police Service, involves two investigating officers, with one focused solely on the exploitation investigation and working with, if not part of, the police service and other agencies in the child's home area. For investigations involving crimes committed in a different geography than the child's home area, these two officers could be in different areas. If the multi-agency child protection unit model suggested below becomes a reality across the country, it might be most effective for officers investigating the exploitation side of these cases to be part of such units in most instances.

Diversion addresses criminal behaviour by using resolutions which avoid formal processing through the criminal justice system. This is one way that the police try to redirect children away from crime as an alternative to criminal charges, and there is significant evidence that diversion can work well for children. This is partly because, as police experts recognise, time spent in the criminal justice system is 'criminogenic' - it creates the psychological, economic and other conditions that make further crime more likely.

Police experts identified three core barriers to the effective use of diversion for children who have been exploited.

First, many children and communities lack trust in the police, which contributes to an unwillingness by many exploited children to communicate with the police about what has happened to them. As a result, children may give 'no comment' responses to all questions asked. Equally, children may refuse to divulge information to the police out of fear of retaliation by their exploiters – such children do not feel protected in the way that all children should.

Police experts point to the way that the lack of an admission of involvement in criminal activity from the child can limit the diversion the police can offer them, regardless of whether such activity was the result of CCE. Police experts argue that there is a need for education of defence solicitors who routinely advise young clients who have likely been subject to grooming and exploitation to make no comment in police interviews. This makes it harder to use diversionary processes that could be very strongly in the interest of their clients and of the community.

It is important to note that for a young person, speedy justice is very important, as they are unlikely to have the resilience to cope well with a drawn-out criminal investigation without being drawn further into negative attitudes and relationships with exploiters. Those making charging or prosecution decisions must be aware that children often do not know how to articulate that they have been exploited and that how well a child advocates for themselves is likely to have affected how they been treated, as do other factors such as ethnicity and class.

Some stakeholders emphasise the need for the use of 'release under investigation' to be subject to time limits, in a similar way to bail time limits, to prevent indefinite investigations

which may increase vulnerability to further criminal exploitation and stop young people from moving on with their lives. The Metropolitan Police Service is due to move to the use of bail in place of 'release under investigation' in the coming weeks.

The second reason given was that in cases where police offer a child diversion, the case must be recorded under particular Home Office Counting Rules, primarily numbers 22 and 20. These outcomes cannot currently count as 'detections' of crime and are not counted towards a police service's detection rate. This is the case even if the police have in fact fully determined responsibility for a criminal offence committed by a child victim of CCE, and would be fully capable of prosecuting that child if that were a just use of the law or in the public interest. Given the understandable pressure on police services to improve outcomes in crime statistics, these rules create a disincentive for police to use diversionary resources. This reduces the level of protection for child victims of CCE and increases the likelihood of involvement in violence.

The third reason given is that resources for effective diversion are often unavailable at the level of reliability and quality required. Police services are keenly aware that typical diversion activities that might be offered, such as a handful of therapy sessions or a few weeks of peer mentorship, will not offer the child enough support to escape the gang that has groomed them or recover from their experiences. However, the limited resources available to partner organisations mean that they cannot normally offer more, at least with the immediacy and consistency needed. A wide range of experts and stakeholders have raised the need to support the most vulnerable children in the long-term, for years rather than months, in order to meaningfully address the child's trauma and see them through a change.

Diversion in partnership with specialist organisations supporting young people is one of the main ways that police services can safeguard child victims of CCE. We heard evidence that for this to be effective, police and other staff working in close and repeated contact with exploited children need to be supported to have appropriate attitudes and behaviours towards them.

Police staff, alongside social workers and others, see traumatised children who may have been both victims and perpetrators of crime on a very regular basis. High levels of harm, and the negative behaviours these can cause in child victims, can become normalised, and this can lead to professionals missing signs of vulnerability through desensitisation or learned biases. This process is recognised, under the concept of 'officer norms', by the National Police Chief's Council's National Vulnerability Action Plan^{iv}.

Experts expressed the view that this is particularly likely to happen for children from demographic groups that are very overrepresented in these professionals' working lives, including teenage boys and children from Black communities. A lack of understanding of the diverse cultural and socio-economic contexts that children in need of protection live within can also be a factor in preventing professionals from recognising the vulnerabilities that children have. This can cause professionals to fail to treat children as children and victims as victims, which results in failures to protect children and prevent future violence.

This desensitisation can be minimised through effective support for professionals, including both individual and group clinical supervision for all child protection professionals, including police officers, to enable open and safe supervised discussion of the circumstances they have encountered in their work and their emotional responses.

Finally, a number of experts cited the need for effective work to take place with children whose parents have been imprisoned. Operation Paramount, which is a partnership between Thames Valley Violence Reduction Unit and the charity Children Heard and Seen, has an impressive record of success in breaking the link between parental imprisonment and offending by children. Whereas some national data suggests 65% of boys with a parent in prison have gone on to commit an offence, of the more than 600 children supported by this programme only 2 have been recorded as committing an offence^v.

The need for culture change

A number of experts identified the need for a broader cultural shift, in addition to improvements to particular programmes and structures, in order to protect children impacted by CCE^{vi}. This would include action to create a shift in thinking so that, if a child commits a crime, a proper response might be to ask how and in what ways the child's support network had failed them, and to support the child. One of our panellists summed it up by saying that, when children commit crimes, the primary question should be what is wrong with us, collectively, as responsible adults, rather than what is wrong with them.

A child who has been groomed into criminal activity will, in many cases, have had a chaotic home life and or experienced domestic abuse. Evidence was given that 85% of homicide suspects have a domestic abuse flag in the Thames Valley policing region. It is 40-50% in London.

Stakeholders pointed to a need for a reframing of the way child perpetrators of violence or drug offences are described and thought of, given that many crimes committed by children, including crimes of violence, are the result of grooming, exploitation and past abuse. Experts also pointed to established neuroscience in relation to the maturing of the brain not being complete until a person's mid-twenties.

The age of criminal responsibility (10 years old) was identified as a contributor to the culture of criminalising victims of child criminal exploitation. England and Wales, and Northern Ireland, now have the lowest age of criminal responsibility in Europe^{vii}. In Portugal, the criminal age of responsibility is 16, while many other states set the minimum age at 12 or 14. The age of criminal responsibility was increased to 12 in Scotland as of 17 December 2021. There was a sense among several stakeholders that raising the age of criminal responsibility would have a positive impact in fostering a broader culture change in treating more CCE victims as victims.

There was a consensus that when talking about CCE victims, the primary concept must be that of child protection – this is the primary responsibility for all agencies, all professionals, and all adults in responding to CCE. It was noted that some police services are now looking at a broader ethical set of outcomes for internal performance evaluations, looking not only at numbers of detections or judicial outcomes, but also whether there was a positive outcome for society. This is something that should be further investigated and supported.

A multi-agency approach to CCE child protection

There is a consensus among experts that police services cannot protect children from CCE risks, or prevent the youth violence that results from grooming, on their own. Close, consistent partnership working with a variety of agencies is critical. Poor multi-agency working in child protection is a long-standing problem.

Staff across the different services interacting with children should be empowered to share information, critical analysis and challenge across professional boundaries. The scope and protocols for this information sharing should be set out in guidance.

Police experts referred to growing support for an improved model for work to protect children, in particular from ‘contextual’ threats outside the home. This would take the form of a dedicated multi-agency child protection unit to deliver a joined-up response to protecting children from CCE and CSE in local areas. Implementing this model will require dedicated resources.

Such units would be better equipped to focus on CCE and CSE threats while understanding their similarities and differences, and to take the preventative approach required. Specialist police staff working in these units could develop constant close relationships with colleagues from partner services. Unit staff could be better placed to develop detailed knowledge of contextual threats in their local area, and to develop combined planning for safeguarding activity and a range of pathways for children affected by CCE. Experts stressed that it is very important that specialist staff working within the unit be empowered to hold partner agencies accountable for actions taken once a child has been assigned to a particular safeguarding pathway.

The assessments made by multi-agency units, informed by police data, could be used to inform resource need assessments for partner agencies, to ensure that the services that need to be provided for children in need of protection by partner agencies can be accessed when they are required. For example, police services frequently use hotspot analysis to inform their operations. This has an evidenced record of success in preventing violence, and there are clear overlaps with the understanding of child protection needs in terms of place-based risks outside the home that has increasing support, and which is described in greater detail below. The scope for Serious Violence Dashboards and other internal policing data and analysis tools to be used to inform broader contextual safeguarding assessments and plans should be examined.

Most stakeholders indicated that institutional barriers to sharing data were a frequent source of failures to protect children. Without the ability for professionals to communicate risks and strategies to protect children across geographic and organisational boundaries, effective multi-agency working is often impossible. Practitioners indicated that there is significant fear among staff working with children around data sharing, sometimes based on misunderstanding or confusion around the understandably strict laws on data protection. Action is needed to clarify data protection requirements, set national standards for data sharing, and improve training to ensure existing flexibility within data protection laws is understood. This does not need to start from a blank sheet, but can build on existing models, including ongoing work within the Metropolitan Police Service to integrate their child abuse investigation data tools with data held by external partners.

Finally, there is a need for clear guidance for the many different agencies working with victims and those at risk of CCE to ensure that all stakeholders know what support should be given to children who are vulnerable, when thresholds for that support have been met, and whose responsibility it is to ensure specific forms of support are provided. Thresholds for obtaining particular support, such as mental health support, should be reviewed to ensure they correlate to risk. This guidance could consolidate and update existing guidance, which has been improved across a number of service areas over recent years, as CCE has gradually become better understood.

Tackling technology-enabled exploitation and online grooming

We have heard repeatedly that one step that could be taken to increase barriers to the county lines business model and make investigations, safeguarding, and prosecutions easier would involve regulatory restrictions on the sale of unregistered ‘burner’ mobile phones. These can be more difficult to link to specific purchasers or users, and, unlike typical smartphones, may not store extensive data about communications that could be used as evidence.

Prepaid phones can provide digital anonymity and are often purchased with cash and a fake name given upon checkout. Despite being a key tool in enabling criminal activity, particularly amongst children, burner phones are not illegal in the UK. A requirement could be introduced to provide proof of name and address and contact details when purchasing any form of mobile phone, similar to the requirement in Australia – in which a date of birth is also required – to increase barriers to the extensive use of disposable phones for illegal activity and exploitation of young people.

A further step would be a strengthened legal regime for providers of communications devices or services to release information that they hold to police investigating possible cases of CCE or CSE. A recent Crest Advisory report suggested that the worst offenders in this regard are social media apps such as Snapchat. Powers for investigators already exist, under the domestic and

overseas 'production orders' regime, and it may be that the major issue is working internationally to ensure compliance with the existing powers from resistant companies.

Some stakeholders suggested a further step that could be explored, of imposing a legal duty on both providers of communications devices or services and social media companies, wherever they are located in the world, to provide Ofcom or the police with Suspicious Activity Reports (SARs) to report suspicious activity they have spotted in relation to the grooming or recruitment of children by criminal gangs. This duty on social media companies would be similar to the duty imposed on banks to report suspicious activity in relation to money laundering under part 7 of the Proceeds of Crime Act 2002, and would supplement the existing 'production orders' regime under the Police and Criminal Evidence Act 1984 and the Crime (Overseas Production Orders) Act 2019.

It is important that further steps in this direction are future-proofed, to protect against a move away from the use of particular apps or devices as investigative methods change or new technologies such as 5G become available at scale. The same Crest Advisory report notes that new, cheap pay as you go devices are coming onto the market that offer access to social media and encrypted messaging apps. These could effectively represent a form of 'burner smartphone' and could represent an even greater threat^{viii}.

There was a consensus among experts that online spaces have been increasingly used to initiate grooming of children into CCE^{ix}. This was a particularly dominant method of grooming during the Covid restrictions. Children deserve no less protection from CCE grooming in online spaces than they do on our streets, in fast food restaurants, or in schools.

A wide range of experts agree that, at present, social media companies are effectively unaccountable for the harms perpetrated by criminals on their platforms. This needs to be addressed by ensuring that social media companies know what is expected of them, and that they will be held to account for continued failures.

Types of content that need to be tackled include images and words glorifying violence, as well as communication seeking to groom, threaten or coerce children. This includes communications that are already illegal, but it is also likely to include a broader category of legal but harmful communication.

It is not widely understood what forms of words and images are typically used to groom children into CCE. This indicates a need for research and official guidance to inform social media companies about which form of words and images are considered harmful, so they can ensure a warning is triggered on their platforms and the content taken down and or users blocked and reported for police investigation on suspicion of CCE grooming.

Project Alpha Social Media Hub is a Home Office funded Met Police initiative focussed on tackling violence associated with social media. A key thrust of the Hub's work is to make referrals to social media companies to request that they take down harmful content which is in

breach of their community guidelines. This harmful content includes the advertisement for sale of knives, drugs, and the glorification & provocation of violence, in online spaces frequented by young people.

Some, but not all, of the regulation needed could be established by ensuring that CCE grooming is fully included within the regulatory structures established by the Online Safety Bill. For example, including the core offences of modern slavery and human trafficking in the Modern Slavery Act 2015 within Schedule 7 of the Online Safety Bill, as 'priority offences', would impose a legal duty on social media companies and others to prevent users from coming into contact with content that amounted to commission of those offences. It would also require the creation of reporting mechanisms in relation to CCE content for users of platforms, regular risk assessments, etc.

However, it is less clear from the existing Online Safety Bill whether CCE grooming that would not necessarily constitute a criminal offence would also be covered within the content harmful to children that social media companies will have a legal duty to remove and prevent children from accessing. Within the present draft of the Bill, this could be accomplished by the inclusion of CCE grooming communications as "Primary priority content that is harmful to children" in secondary legislation to be introduced to Parliament by the Secretary of State.

This is a further area where greater clarity of the law around CCE grooming and the modern slavery offences would be beneficial, including through a statutory definition of CCE. We cannot be satisfied that the legal structures are truly in place to hold social media companies to account, unless it is clearly understood that making contact with a child in an attempt to groom them into CCE is in itself a criminal offence, and that that offence is included as a 'priority offence' within the terms of the Bill.

Educational response

All our expert contributors were clear that schools have a huge part to play in preventing youth violence. At their best, schools are a place of safety where all children's talents and aspirations are celebrated and nurtured, including in communities where violence between young people is a frequent problem. Schools can provide trusted, friendly and caring faces of state authority, helping to build resilience and mitigate the additional vulnerability to CCE caused by distrust of the state and wider systems of authority. Unfortunately, schools do not always perform these essential roles effectively.

Some stakeholders argue that it is important for both the design of the multi-agency approach to CCE child protection, and the leadership and funding to implement it, to come from the Department of Education, to ensure an education led, rather than criminal justice led, response.

School exclusions

More than 50% of teenagers (13-17) killed in London last year were not in full time education, and the evidence that exclusions from mainstream education are associated with greater risk of criminal activity is clear. The Ministry of Justice has found that 63% of UK prisoners were temporarily excluded when at school. 43% had been permanently excluded, and permanent exclusion was further associated with repeated offending.^x There is high quality evidence of a more specific link with CCE too, including in research funded by the Department for Education^{xi}. Police experts told us that 64% of the teenagers killed last year were not in full time education.^{xii}

Children who are permanently excluded often never return to mainstream education. They may be moved to 'alternative provision', which is a relatively unregulated sector that has historically been of extremely mixed and often poor quality. The Timpson Review found that less than 5% of children educated in alternative provision were awarded "good passes" in English and Maths GCSEs in 2016/17^{xiii}.

Exclusion is sometimes a symptom of problems in a child's life that are already making them vulnerable to grooming. However, it is usually also a cause of further, greater vulnerability. There are many anecdotal examples of children whose grooming began, or intensified, following a move into 'alternative provision' or another form of exclusion. It was suggested that, in many cases, by the time a child is excluded, they have already begun to be groomed. Nevertheless, both criminal justice and social policy experts agreed that when a child is excluded, this should act as an immediate safeguarding flag for intensive multi-agency intervention and support.

From the evidence we have heard, there was the sense that no child should be permanently excluded, and that exclusions can be avoided by having better school policies, resourcing schools properly, significantly improving the accessibility and quality of child and adolescent mental health services (CAMHS), and supporting teachers better. There were positive examples cited of schools or school networks that take the attitude that exclusion would represent the school failing the child, and this will never be something they accept.

There is clearly a need for local authorities and communities to be empowered to hold schools accountable for the exclusions decisions they make, and for intense scrutiny to fall on the minority of schools that exclude large numbers of students, or who exclude students disproportionately from particular backgrounds. It was noted that frequently the backgrounds of the people making exclusion decisions differ significantly in terms of class and race from the student body and wider communities that their decisions have a significant impact on.

Zero tolerance policies can be extremely harmful in the context of exclusions, because they can involve mandatory punishments for certain behaviours that do not take account of the child's circumstances. This can not only be profoundly alienating and destructive of trust, but rapidly escalating 'zero tolerance' sanctions can quickly lead to a decision to exclude, directly putting the child at risk of grooming. Simplistic or automatic policies can also be manipulated by groomers, who can coerce a child into breaking a school policy in the knowledge that they will be punished, suspended, or excluded, which will further increase their hold. Not tolerating harmful child behaviours can be a positive approach, but school policies that automatically level specific sanctions without taking time to understand the context do not safeguard children and can put them on a pathway to exclusion and make them increasingly vulnerable to grooming.

Teachers and schools need to be empowered to take a trauma informed approach to harmful behaviour^{xiv}. Alice Tawell, of the Excluded Lives project at the University of Oxford, noted, based on interview data, that teachers can see harmful behaviour either as a choice on the part of the child, or as communicating that something has gone wrong. This can drive responses that are either punitive and exclusionary or focused on safeguarding and inclusionary. In some cases, schools can begin to see particular children as problems rather than seeking to deal with the problems that are driving harmful behaviour.

Some teachers see themselves as partly social workers, while others strongly reject this role because it is outwith their training or because it can conflict with other reasonable priorities given their limited resources. In many cases where schools are very stretched in terms of resources and attempts to secure specialist support, for example on mental health or learning difficulties, have failed, the school may eventually justify exclusion on the rationale that, following exclusion, the child will finally get the support they need. Unfortunately, this justification is rarely matched by reality.

We know that children from some backgrounds are much more likely to be excluded in many areas of the country, and this often has a significant overlap with disproportionalities in youth

violence deaths, charges, prosecutions, etc. The national evidence shows that, for 2019/20, pupils from a Black Caribbean background had an exclusion rate double that of White British background pupils, while pupils with a Gypsy Roma background had an exclusion rate three times that of White British background pupils. However, it is important to note that this is not a simple story. At a national level, pupils from several ethnic minority backgrounds have lower rates of exclusion than White British background pupils, and ethnic community disproportionalities in exclusion reduced between 2018/19 and 2019/20 at the same time as the overall exclusions rate fell. Similar ethnic divergences exist in local areas heavily affected by youth violence, although at this level the numbers are small enough to fluctuate significantly from year to year, making robust analysis difficult.

Truancy and 'on-roll' exclusion

There was consensus that support given to families when children aren't attending school should not be punitive and that prosecuting parents for truancy is unhelpful. For many children who truant, their parents simply cannot get them to school despite their best efforts, particularly given long hours at work and problems in the home, among other issues. If a child is already being groomed and this is a factor in their truancy, a punitive response is more likely to reduce their resilience to further grooming and exploitation. Instead, schools should be highly attentive to the context, and use truancy as a sign that safeguarding may be needed.

It was noted that women are more likely to be prosecuted for the truancy of children than men. These prosecutions come with the possibility of a fine, which could contribute to economic vulnerability to grooming, or a prison sentence, which we know is associated with a significant increase in risk being groomed into criminal activity for children whose parents are in prison.

We need better data not only on those off-rolled^{xv} and those in persistent truancy, but on those who are being kept on roll but for reduced hours. A police expert told us of a recent case where a child who had likely been groomed into criminal activity was technically on a school roll but was assigned just 40 minutes of contact time at a Costa coffee shop, which they never actually attended. In reality, this child had no educational or welfare support at all from their school. Nevertheless, they would not have appeared in 'off-rolling' statistics.

One police expert told us that the move to Academy models of governance has meant there hasn't been a consistency of approach. Academy schools all supply truancy data at different rates, and approaches to dealing with in-school criminal offences can differ very widely. One school was found to have had 600 missed safeguarding opportunities, many of them linked to in-school criminal incidents.

The need for earlier intervention and preventative support

Schools can play a hugely important role in protecting children from exploitation and abuse, including CCE. However, this can only work if school leaders are aware of the threat and what they can do to address it. Schools need to have access to effective guidance creating confidence that when safeguarding leads act in partnership with other agencies, those other agencies will also take prompt and consistent action. Professionals working in and with schools need to have adequate training in trauma awareness, to help them spot the signs of CCE, or vulnerabilities to CCE, and respond in a trauma-informed way. Efforts to achieve this would be bolstered by a statutory definition of CCE and the other national leadership steps recommended by this report.

Broader pastoral support services offered by schools are vital to building resilience against CCE grooming, in addition to more specific action to protect individual children from risks when warning signs appear. Schools need adequate resources to help children to access timely and effective mental health support, to effectively support children with learning difficulties, Special Educational Needs, or disabilities, and to support children in dealing with the consequences of child poverty, social exclusion, or difficult family circumstances. Without these forms of support being available to all the children who need them, including those who may not meet high thresholds for local authority child protection or for support from Child and Adolescent Mental Health Services, an integrated schools approach to protecting children from CCE will not be possible.

Schools can also help to build resilience in children by creating awareness of the risks of CCE grooming and exploitation among staff, parents, and children. The extent to which safeguarding against CCE is effectively integrated into school curricula is unclear. Some stakeholders have noted that this is an area where further work could be done to establish best practice.

Social services response

Social services' interactions with families, whether in relation to CCE or other concerns, can have a huge impact on the vulnerability and wellbeing of children. A well-resourced and supported service, capable of making accurate decisions based on strong knowledge of and relationships with families, can improve children's resilience to CCE. The cost of poor decision making, however, whether it leads to risks of harm being missed or children needlessly separated from their family, is extremely high and can make children more vulnerable to exploitation.

The Independent Review of Children's Social Care^{xvi} sets out a clear direction of travel for transforming the approach to combatting harm to children. Implementation of the Review's recommendations, coupled with a statutory definition of child criminal exploitation and leadership from Government to complement these recommendations by creating a joined-up multi-agency response, could provide real progress towards effectively protecting children from CCE.

A key recommendation made by many stakeholders is fuller recognition of the crucial support family and extended family can provide to children at risk. For this support to be fully utilised, family, including extended family members involved in a child's life, should be meaningfully engaged by services when they make child protection and diversion plans. Many safeguarding-focused services that have historically looked to parents as a primary source of risk continue to struggle with the need to work with parents and see them as an essential protective factor against risks to children from outside the home.

Any approach which sees social services, families and other agencies meaningfully engage to jointly combat CCE, share data and challenge decisions, requires national guidance which clarifies where responsibilities lie, expectations and best practice. To be effective, this guidance must be well publicised across Government departments, public services and community groups.

Understaffed and under-resourced

Underfunding makes it extremely difficult for social services to keep pace with the level of need among child victims and children at risk of CCE. Cases where children who are clearly vulnerable to serious harm, but do not get timely support from services when they ask for it, illustrate the impact chronic underfunding has on children. Ensuring that social workers have the time to build stable relationships with and get to know children and their families requires a move away from reliance on agency social workers, rebuilding the professional workforce.

Relocating children

Children should not be separated from their families unless it is necessary to keep them safe. Stakeholders indicate that in some areas, a very high proportion of children known to social services have been placed into care and relocated to a new area. Experts from different professional backgrounds reported that, far too frequently, once children are in care, the Corporate Parent is not looking after them well enough.

The relocation of children away from their families and into care in areas far from their homes has reportedly extended county lines from urban to rural areas, helping to drive the expansion of this business model over the past decade. Stakeholders indicate that some of the places where children from London had been relocated to, such as Kent, are now hotspots for drug crime. Removing children from their families and support networks can make them more vulnerable to gangs.

The recent report 'Out of Harm's Way' by the Commission on Young Lives^{xvii} contains important evidence and specific recommendations to prevent children from being placed in unregulated children's homes without appropriate care arrangements. The report refers to very low levels of protection from CCE for some children in these circumstances, including anecdotal evidence of criminal gangs being tipped off when vulnerable children are being moved into unregulated settings, because they would represent a highly vulnerable target for grooming and exploitation.

Ensuring that children can be relocated with their families, away from gangs, means that they can retain their support networks and avoid the isolation which can make them vulnerable to criminals. It is vital that where a family needs to be transferred, social landlords, the DWP, and other Government agencies are motivated to assist. For this reason, local authorities need to be involved in the multi-agency unit's approach and included in guidance on protecting children from CCE.

One aspect of this problem is that social services in the area that a family is moved to often do not immediately pick up the family's case and initiate actions to protect the children in relation to known risks, including around CCE. In some cases, this is because they are not informed in good time by the originating local authority. Some experts suggest that a statutory duty will be necessary for children's social care services to alert the new local authority that a move is occurring, and to transfer knowledge about protection needs and risks posed.

Some children who are being moved will pose a risk to others in the local area, for example if they are placed in a secure children's home or a foster home with other children. In some cases, there will be risks of violence linked to postcode conflicts that will need to be managed. Any statutory duty on social services to fully inform the local authority about transfers of children must come with adequate resourcing if it is to avoid exacerbating the problems caused by the current under-resourcing of social services.

Community response

Those working with children in the community indicate that examining the context in which a child is committing violence or other offences is key to safeguarding that child and addressing the root causes of their behaviour, as is offering a community wide response to protecting children from exploitation.

Contextual safeguarding cannot be carried out by professionals alone. The informal networks in a child's community, including neighbours and relatives, can help. Where the funding of an organisation that was working to protect children in a local community comes to an end, this network remains. More could be done to support and engage these networks.

Pilotism

Community-based support is highly effective when it is done well, and the ongoing work of community organisations helps to create resilience and prevent youth violence. However, too frequently Government support for community organisations is afflicted by 'pilotism'.

Larger agencies and charities that do not have links to a local area are often able to obtain short-term funding to work there. When their grant ends, the project ends and they leave. A project that lasts only a year or eighteen months leaves communities and families without consistent support and is unlikely to establish effective protection for children in such a short time frame. Families and children often have to work with new people and charities repeatedly, rather than with those who they have come to know and trust. This creates distrust of agencies and charities among families who need support. Distrust of public service organisations ultimately reduces a community's resilience against CCE.

Pilotism also adds to many children's experience of being let down by professionals. For example, one child in Lyn Brown's experience who had been groomed and become involved in gangs was offered only 6 weeks of occasional contact with a mentor, and was simply told that when that support ended there was no funding for anything more. Recognition is needed that a child's recovery from exploitation requires years of support, rather than weeks or months. Charities under existing funding models are rarely funded for the extent of support needed. Some children have lived with trauma for years or their whole life and others will have witnessed murder. They will take years to recover. Longer-term funding is needed to ensure that children and their families are supported for long enough to bring about sustainable, meaningful change in their lives.

A focus on locations and context

There is understandable frustration with the way that the current approach to CCE sees one child victim replaced by another. Certain locations, whether offline or online, pose risks to children and these locations need to be a key focus of prevention work.

There is a need to make use of the adults who are already present in the places children spend time, such as those working in fast-food venues, internet cafes and shopping centres. These members of the local community can assist in assessing the welfare of the children in these spaces. Aside from training adults present in the community to identify exploitation, it is important to find ways to support them to have better relations with young people, rather than viewing them as a nuisance. This can reduce the hostility children face and their vulnerability to abuse. This matters, given that many children are drawn to those who exploit them by an initial sense of belonging or a feeling of being loved. Ultimately, supporting adults in the community to have positive relationships with the children they come into contact with can help increase trust and make local spaces safer for children and less accessible to those who would exploit them.

Making spaces safe for children, or keeping them away from unsafe spaces, requires a joined-up approach. A response that is solely focused on policing may have the unintended consequence of simply temporarily moving the problem elsewhere. For example, flooding a location with police officers can have the unintended consequence of dispersing the children who use that space, rather than providing a solution which safeguards them.

Safe alternative spaces need to be provided for children. For example, if children are spending time in cafés where they are at risk in order to use the WiFi or to socialise, the solution must be to provide alternative safe spaces. Safe social spaces are especially important, given that social isolation can make children more vulnerable to exploitation.

Local authorities play an important role, which is not limited to providing safe spaces such as youth centres and libraries, or to implementing contextual safeguarding within children's and other services. Councils also need to understand that making public spaces safe for children means not driving young people out of them by prioritising the voices of older adults or, for example, treating fundamentally harmless behaviours as instances of ASB.

There is a need to take a holistic, contextual approach when measuring outcomes of child protection efforts. It is vital to look not just at how many children have been diverted from crime but whether the context or place (whether a friendship group, a shopping mall or an online platform) where they were groomed remains dangerous to other children.

Local child advocates

There is an awareness among community workers that children need an impartial advocate in their local community who will support them in the long-term, and who does not present a perceived threat. For children afraid of the consequences of speaking to the police or social services, this kind of advocate can offer crucial support free of these risks. Children experiencing a difficult home life may especially benefit from an independent listener and advocate.

Child advocates can be key to making sure that children get the support that is meant to be available to them. Different agencies involved in a child's life often do not communicate well or in good time, due to under-resourcing. Too frequently teachers or police officers who signpost vulnerable children to social, health, or specialist education services do not have the resources or time to follow up and ensure that the commissioned activities actually happen, or monitor outcomes. A community youth worker who has the energy to effectively take children by the hand to the correct agency and ensure they are given the right support, can make all the difference.

Family advocates

Families in need of help can often be in contact with six or seven professionals from different agencies, with little consistency of support. Families can provide important support to the child at risk and should not be neglected. Community workers point to the need for an approach that assists families in protecting their children from exploitation. This approach must respond to the way that many families are struggling with difficult circumstances. For example, where a family is in overcrowded and inadequate housing, with very limited financial resources, and the parents of the child are struggling to cope, the stressful home environment may make the child more vulnerable to exploitation. A therapeutic intervention for the parents, followed by counselling for the child, can lead to progress. A community worker who is there to advocate and assist the family can win their trust and look at whole family solutions.

Faith groups

Faith groups are often already present and available in the communities where children are at risk and many children already have links to faith groups through their family. Strengthening these links may give children an alternative sense of belonging and moral accountability to that offered by gangs. Giving children a different worldview to the one presented to them by gangs can lead to behavioural changes. This is important to as it offers children resilience to the messages used by groomers. This includes work to help ensure that children do not feel bound by the code of honour held by gang members, which can inhibit them from speaking to adults, including the police and other services about the gang's activities.

As with other vocational youth workers, faith workers tend to support children for vocational reasons, offering a level of enthusiasm that is beneficial to children who feel they have been let down by others. Additionally, faith buildings can offer safe spaces for children and teenagers, as long as they offer sufficient diversion activities.

Positive alternatives to gangs

Children can in part be drawn into gangs because they make them feel loved and included, so alternative “tribes” need to be provided for these children which offer the same sense of belonging. Providing young people with meaningful opportunities and the hope that comes with those opportunities can counter the appeal of the economic benefits offered by gangs. It can also give hope to children who have been through the criminal justice system that a meaningful career, away from crime, is still possible for them. Businesses that offer young people both a sense of being valued and an alternative way of earning a good living are especially promising.

Those working in the community want to see the diversion activities provided to young people at risk, and those leaving Young Offender Institutions, include employment that builds skills and promotes hope and self-respect. Low-skilled work that offers few opportunities for meaningful career advancement may not do this. Work should be done with businesses and large companies to encourage them to give young people paid employment opportunities.

Deficits of national leadership

The current piecemeal approach to preventing CCE is not working. Neither is the narrow focus from Government on criminal justice enforcement, who are not best suited to deal with the complex issues of trauma and vulnerability that have increasingly taken up their workload as other services have been defunded.

Experts are clear that higher quality and more accessible universal support for children can help to create resilience against CCE grooming, and that later, more targeted support is needed, working with the whole families of the children who are at risk. This support must be consistent, multi-agency, and long-term. The system change needed will not be possible without strong leadership from Government.

System leadership and legal clarity

A number of experts echoed the importance of clear statutory definitions, a view that is being consistently emphasised by The Children's Society, Barnardo's, the Commission on Young Lives and others. One police expert noted that the lack of clear definitions and distinctions between different forms of child exploitation and abuse can result in a lack of properly evidenced thresholds for intervention in different statutory bodies, because it is harder to assess volumes of a child protection concern in conjunction with the risk those concerns pose.

There is a lack of a clear understanding across services spelling out how to identify children at risk and what to do once a child has been identified as being at risk or a victim of exploitation. There is also an absence of a clear understanding of which services are responsible for key actions that should be taken to protect children who are at risk or have been exploited. Existing multi-agency organisations that have a statutory basis, such as Community Safety Partnerships, do not necessarily have a focus on CCE, or indeed other child protection issues, and few are equipped to implement a strategic contextual safeguarding approach for their local area.

As this report has shown, child victims of criminal exploitation tend to come into contact with a range of public services that are not designed specifically to help them with their particular needs. For example, they may come into contact with mental health or other health services, the police, housing authorities and social services. This is frequently inefficient and wastes public money, meaning that increasing the quality and accessibility of the support children need may be able to draw on savings made from reduced duplication.

As there is no clear and joined up structure for the approach these services should take to identify and support victims of child criminal exploitation, children can fall through the cracks. This is an issue of system design and leadership, and one where the Government must have a core role in ensuring change.

More broadly, a successful and consistent shift to a contextual safeguarding approach across local areas is unlikely to take root without determined leadership from the Government and the national leadership bodies that govern the public services that are crucial.

Anti-poverty programmes and universal preventative services

Experts point to the harsh environment in which many children in the UK are growing up. Social injustice, a lack of adequate housing, poverty and structural racism and classism are all factors which drive violence, including by increasingly children's vulnerability to grooming. For example, many children today see their parents struggling to pay rent and buy the basics. They can see that there is no money, and they often want to make this easier on their family in any way they can.

Professionals cited both examples of children who have been exploited into criminal activity on the basis of providing much needed money for the family, and a broader sense that, for children from disadvantaged backgrounds, experiences of child poverty increase the attraction of the 'alternative economic models' that groomers offer. There is clearly widespread frustration among experts and practitioners with the Government's failure to solve these social problems, or indeed even to acknowledge them.

This is a view that is beginning to be supported by more empirical evidence based on the impact of UK social policy over the past 12 years. For example, a recent statistical analysis in The British Journal of Criminology finds evidence that the rollout of Universal Credit, which typically results in lower levels of social security support than existing systems for most claimants, may have had a bigger impact on crime levels during the period under study than hotspot policing methods, stop and search, or the use of CCTV. The findings of this study were particularly robust for violent crime.⁴

Home Office funding of police initiatives helps with the criminal justice response to child exploitation but does not address the contexts which make children vulnerable to criminals. There is agreement among stakeholders that to meaningfully reduce the availability of children to organised criminals, long-term and substantial funding of public services, including mental health services, social services, schools and youth services is required.

The Department for Digital, Culture, Media & Sport's Youth Investment Fund^{xviii}, which aims to create and improve youth centres in parts of England, cannot make up for funding cuts^{xix} to Sure Start, the closure of youth centres as a result of cuts to local authority budgets, and the various real term cuts to schools and other agencies that have a role in supporting vulnerable children. The Youth Investment Fund operates in two boroughs of London only, and so is incapable of offering a meaningful way of protecting children across London by building their resilience against grooming.

A major problem is that the available data is inadequate to enable a full cost benefit analysis of measures such as improved CAMHS support, restored youth services provision, or expanded diversionary programmes for young people who are being groomed or are at high risk of CCE. This presents a considerable barrier to public agencies who can often show that individual interventions or projects do reduce offending or prevent violence but are unable to combine this into a more powerful cost-benefit case for more systemic investment in the preventative services we need.

Recommendations

A joined-up approach

- The introduction of a statutory definition of child criminal exploitation within the Modern Slavery Bill would be the fulcrum for a Government-lead national awareness campaign about the roles we can all play in ending CCE. Introducing such a definition would help to focus attention on CCE throughout public services that play roles in the response, and provide a clear reference point for all the other reforms needed.
- Police procedures for investigations around children who may have committed crimes where CCE is plausible should be reviewed, with national leadership from the Government. The review should consider the merits of separating investigations of a child's possible offending from investigations into their possible exploitation, and how best to work across geographic areas to increase the chances of a successful investigation of CCE.
- Models should be developed for new multi-agency child protection units to 'own' and deliver a joined-up response to protecting children from CCE, CSE and other child protection threats in local areas. It is important that this model outlines the definitions of and differences between CCE and CSE, as well as recognises that children affected will typically need different forms of support, and that neither should be prioritised at the expense of the other. This should include an assessment of the resource impact of such new models.
- There should be a review of the merits of placing the remit of multi-agency child exploitation panels into statute, with a mandate to address both CCE and CSE cases, including those that do not meet the threshold for a child protection investigation under the Children Act 1989. This could help to ensure that support is offered at an earlier stage in child exploitation cases, and enable more accountability for local agencies in terms of the actions they have taken before exploitation intensifies and youth violence becomes more likely.
- The multi-agency unit should be empowered to hold partner agencies accountable for actions taken once a child has been assigned to a particular safeguarding pathway.
- Guidance should be published for children's services, local safeguarding children partnerships and community safety partnerships in implementing contextual safeguarding methods by risk assessing places used by children vulnerable to CCE and safeguarding the children in those places. This guidance should enable partner agencies to use shared language in talking about children in need of protection from CCE, to focus on contextual threats (outside the home), and to identify common objectives and outcomes.

- Once such multi-agency units are established, there should have clear accountability lines and a clear mandate to provide transparency data on their performance on CCE and CSE in local areas as part of an annual report. These plans should include local performance data for CAMHS referrals; rates of exclusion, suspension, and low contact time for pupils assessed as vulnerable, among other key data.
- Clear national expectations should be set for all local areas to publish a broader strategic assessment of child protection needs including a plan for contextual safeguarding in their area as part of their annual reporting process.
- Resource levels required should be reviewed for all children in need of interventions from CAMHS, education, children’s services, social housing providers, and others, to ensure they receive adequate and timely support once a referral is made.
- Resource assessments must take into account the need for professionals to have the time to develop relationships with children, understand their circumstances and perspectives, and work in partnership to ensure their physical and psychological safety.
- ‘Pilotism’ should be ended by securing Treasury backing for all cross-Whitehall funding for community-based support for vulnerable young people at risk of involvement in violence to have a 3-year minimum timescale. Funding opportunities must be made accessible to local providers. The Association of Police and Crime Commissioners should be approached and requested to embed similar norms within their commissioning work.
- Additional data should be identified around costs of custody vs diversion, reoffending impact estimates, health costs, costs to the economy, etc. that are needed to be able to perform a full cost-benefit analysis of a package of diversionary and preventative measures versus the status quo.
- National guidance should be introduced to harmonise best practice on data sharing across services involved in child protection work. This should include consideration of how both public services and voluntary sector providers can share information. This should be supplemented by improved training in local areas to ensure existing flexibility within data protection laws is understood.

Preventing technology-enabled CCE

- Draft regulations should be developed and consulted on to restrict or ban the sale of unregistered and disposable ‘burner’ phones, which are a core tool used for county lines groomers and exploiters to obstruct detection and investigation of their crimes and to escape justice. People buying a mobile phone should be required to provide proof of their name, address and contact details before they can start using it.
- The potential should be explored to impose a legal duty on both providers of communications devices or services and social media companies, wherever they are located in the world, to provide Ofcom and/or the police with Suspicious Activity Reports (SARs) to report suspicious activity they have spotted in relation to the

grooming or recruitment of children by criminal gangs. This duty on social media companies would be similar to the duty imposed on banks to report suspicious activity in relation to money laundering under part 7 of the Proceeds of Crime Act 2002, and would supplement the existing 'production orders' regime under the Police and Criminal Evidence Act 1984 and the Crime (Overseas Production Orders) Act 2019.

- In preparation for the implementation of the Online Safety Bill, research should be commissioned and published on which particular forms of words and types of images are likely to be involved in CCE grooming.
- To prepare the ground for this, amendments should be introduced to the Online Safety Bill to include Sections 1 and 2 of the Modern Slavery Act in Schedule 7 of the Bill as 'Priority Offences'. In parallel, it should be specified in secondary legislation that CCE grooming communications are to be considered "Primary priority content that is harmful to children", within the terms of the Bill.
- Social media companies should be given clear guidance to inform their policies on which form of words and images are considered harmful and be reminded of their legal responsibility to implement algorithmic blocking or flagging to moderators on their platforms as appropriate.
- Ofcom should be held accountable for its performance in monitoring the success of social media platforms in taking down harmful content and referring likely grooming to the police.

Children out of mainstream education

- National expectations around 'no tolerance' behaviour policies should be clarified, in collaboration with Ofsted, the education unions, and independent experts, with an emphasis on safeguarding children at risk of CCE.
- A national model for community scrutiny of school exclusion policies and decisions to supplement the role of local education authorities should be developed, with the aim of increasing the ethnic and socio-economic representativeness of decision-makers on school exclusion.
- An integrated approach for schools to apply to combat CCE should be designed and consulted on. This will include pastoral support to provide early preventative help to children, and a review of how safeguarding and resilience against CCE is integrated into the curriculum.
- Data and transparency around children out of mainstream education should be improved, for those children who are permanently excluded, those in persistent truancy, and those who are on school rolls but have low contact time.

Work with families

- The recommendations made in the Commission for Young Lives report 'A New Partnership With Families: Supporting families to keep teenagers safe from gangs, exploitation and abuse' should be implemented without delay, shaping the Supporting Families Programme and the Family Hubs roll-out to ensure these services are accessible and effective in helping parents keep their children safe from CCE.
- Guidance should be published on how services can most effectively partner with families in providing support to children vulnerable to CCE, providing a clear message to practitioners that parents and other relatives can be essential allies and the most important protective factor in CCE child protection. This guidance should be based around a recognition that taking children into care will often actively put them at greater risk of CCE, and support should be offered to families at the earliest possible stage.
- An expectation should be set that where children need to move areas to protect them from CCE risks, this should move their core family into appropriate accommodation by default and as a priority. Core expectations for such moves, such as the desirability of preserving links to wider support networks including extended family, suitable employment, etc., should be set out in guidance. A review should take place into how best to uphold this expectation through regulation, for example by using the Housing Ombudsman Service.
- Consideration should be given to the possible merits of introducing a statutory duty on children's social care providers to alert a local authority when a child or family is being moved to their area and there are contextual safeguarding risks, for example in relation to CCE or CSE.
- Where children are taken into care, the responsibility of the corporate parent for CCE child protection should be emphasised, and accountability against this responsibility should be a core part of Ofsted inspections. The recommendations made in the Commission for Young Lives report 'Out of Harm's Way: A new care system to protect vulnerable teenagers at risk of exploitation and crime' should be urgently considered to improve protections against CCE and other risks where children do need to be taken into care.

Increasing the quality and consistency of interventions

- What Works for Children's Social Care should be commissioned to work with stakeholders and publish a 'gold standard' for intensive interventions designed to provide ongoing protection for children who have been groomed into CCE. There is evidence that a minimum of 18 months of consistent support is likely to be needed to

protect CCE victims who have been fully exploited^{xx}, including in cases where the child will move beyond the age of 18 before they will receive that full period of support.

- A model for a lead key worker and advocate for children in need of protection should be developed and evaluated, and a review into what additional resources local authorities would need to implement this position should be commissioned, to help join up and make comprehensible contacts and interventions from the many public agencies that are often involved in CCE child protection cases.

Increasing the number of prosecutions of CCE exploiters and their enablers

- The enforcement element of the Government's approach to CCE should focus on disrupting and bringing to justice of higher level organised criminal groups, not individual children who have been groomed and exploited.
- The adequacy of resourcing should be reviewed for National Crime Agency work on regional organised crime groups who fuel CCE through drugs import/wholesale, weapons supply and other core facilitators of CCE-linked youth violence, and for the National County Lines Coordination Centre. The potential for investigations into regional organised crime groups to identify specific links to the use of groomed children by more local drug supply gangs should be explored, with the objective of exerting enforcement pressure on higher level drug suppliers to avoid facilitating CCE through their own activity.
- CPS decision-making should be reviewed around charging in cases where there is evidence both of a drugs supply offence and of a CCE offence and identify any further changes to sentencing guidelines or statute needed to ensure that laws against CCE are fully enforced in practice. This review should address both the practical implementation of use of evidence of exploitation or abuse as an aggravating factor within the Sentencing Guidelines, and the adequacy of charging decisions in cases where there is evidence of both CCE and drugs or other offences. The review should have the explicit objective of increasing the effective gap between sentences faced by drug supply offenders who exploit children and those who do not.
- A register of people convicted of child criminal exploitation offences should be considered. This should include the potential benefits for reducing access to further possible victims, and the message that needs to be sent that CCE is a form of child abuse, and the risk that victims of CCE for whom grooming other children became part of their exploitation could be prevented from moving on with their lives by such a register.

A shift in focus to prevention

- CPS specialists, criminal lawyers, specialist police leaders, violence reduction experts and community representatives should be brought together to discuss how best to change working practices to promote early use of diversion opportunities for CCE victims who may have committed criminal offences as part of their exploitation. This should include a focus on reducing disproportionality in the use of diversionary outcomes, particularly through increasing understanding of and trust in diversion within communities disproportionately affected by CCE.
- The impact of guidance around the definition of ‘Detected Crime’ and Outcome Types 20 and 22 of the Counting Rules for Recorded Crime should be reviewed to ensure that it does not unnecessarily undermine efforts to promote early diversionary outcomes for likely CCE victims who may have committed criminal offences as part of their exploitation, including in cases where the likely CCE victim will not make a criminal admission.
- Public agencies should be clear that improved universal public services are a necessity for preventing CCE, including a re-expansion of place based detached youth work capacity, the re-creation of a network of early years and childhood support services on the model of Sure Start, and significantly increased CAMHS capacity. Agencies need to consistently make the case for these universal services in addition to more targeted interventions. Public agencies should seek to build their collective capacity to make a public money case for increased investment in these services.
- Public agencies should explicitly recognise the important roles that faith-based organisations, social enterprises, and other local community organisations can play in providing alternative ‘tribes’ and economic pathways for children and young people either victim to CCE or vulnerable to it. This should form part of their advocacy for commissioning and partnership working to focus on these organisations.
- Public agencies should recognise that the speed of justice processes is particularly important for child victims of CCE to have a significant chance of being protected from further exploitation and having decent life chances. They should include this as a factor in their advocacy for action to reduce backlogs in the criminal justice system and to promote the early use of diversionary outcomes.

Support for professionals working with children

- National guidance should be developed in support of group clinical supervision for all child protection professionals to enable open and safe supervised discussion of the circumstances they have encountered in their work and their emotional responses. Professionals involved in decision-making about school exclusions should be part of this group supervision structure, which should also extend to police and custody staff and

social workers. The goal of supervision sessions should be the prevention of desensitisation to traumatised and angry children among professionals, and an improved understanding of the diverse cultural and socio-economic contexts that children in need of protection live within. People with lived experience should be invited periodically to increase cultural competence and tackle biases.

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- ⁱ Figure from The Guardian <https://www.theguardian.com/uk-news/2021/dec/31/knife-rises-in-london-with-30-teen-homicides-in-2021>. For the latest available figures for teen homicides in England and Wales in the year to March 2021, see: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/homicideinenglandandwales/yearendingmarch2021>
- ⁱⁱ London Gang Exit: Final Impact Evaluation Report, Dr Tom Davies and Dr Paul Dawson https://www.london.gov.uk/sites/default/files/final_lge_pdf_190122.pdf
- ⁱⁱⁱ According to the latest figures available, first time offences for possession of a weapon have risen between 2011-2021 by 16 percentage points, to 19% in 2021. [Youth justice statistics: 2020 to 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/youth-justice-statistics-2020-to-2021)
- ^{iv} <https://www.npcc.police.uk/Crime%20Ops%20Committee/NVAP.pdf>
- ^v <https://childrenheardandseen.co.uk/2021/11/11/putting-the-focus-on-children-and-families-when-a-parent-is-imprisoned/>
- ^{vi} The Pan-London Child Exploitation Operating Protocol, launched in March 2021, begins with the words: “children that come to notice must be treated as children, whatever the circumstances they find themselves in”. The increased focus on seeing children as children might play a role in the trend for an overwhelming proportion – around 80% – of county lines exploitation cases to be detected and reported by police in London.
- ^{vii} <https://www2.ohchr.org/english/bodies/crc/docs/CRC.C.GC.10.pdf>. See also <https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2FPPrICAqhKb7yhskHOj6VpDS%2F%2FJqg2Jxb9gncnUyUgbnuttBweOlyfyYPkBbwffitW2JurgBRuMMxZqnGgerUdpixij3uZ0biQBOLNTNvQ9fUIEOvA5LtW0GL>
- ^{viii} <https://www.crestadvisory.com/post/running-out-of-credit-mobile-phone-tech-and-the-birth-of-county-lines>. See also <https://www.crestadvisory.com/post/five-things-you-need-to-know-about-new-tech-and-county-lines> for some projections as to possible future developments in the technological ‘arms race’ between county lines gangs and police.
- ^{ix} See for example <https://www.crestadvisory.com/post/county-lines-after-covid-a-new-threat> and <https://static.nya.org.uk/static/f3fcc0c77f1f2d3b579af6274648540b/Between-the-lines-final-version.pdf> for examples of reporting of the use of online grooming modalities by sector experts
- ^x <https://www.ippr.org/files/2017-10/making-the-difference-report-october-2017.pdf>
- ^{xi} https://tce.researchinpractice.org.uk/wp-content/uploads/2022/02/2757_TCE_Education__Exploitation_report_v2.pdf
- ^{xii} For a recent survey on the evidence on the link between exclusions and offending, see <https://www.tandfonline.com/doi/full/10.1080/13632752.2021.1905233>
- ^{xiii} https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807862/Timpson_review.pdf p.12
- ^{xiv} See this report for further research on ‘upstream’ policy change to prevent exclusions: https://excludedlives.education.ox.ac.uk/wp-content/uploads/2021/02/Seeking-a-balance_Oct-2020_Final.pdf
- ^{xv} Off-rolling is the practice of removing a pupil from the school roll without a formal, permanent exclusion.
- ^{xvi} <https://childrensocialcare.independent-review.uk/wp-content/uploads/2022/05/The-independent-review-of-childrens-social-care-Final-report.pdf>
- ^{xvii} <https://thecommissiononyounglives.co.uk/wp-content/uploads/2021/12/OUT-OF-HARMS-WAY-CYL-DEC-29-2021-1-4.pdf>
- ^{xviii} <https://londonyouth.org/dcms-youth-investment-fund-update/#:~:text=The%20DCMS%20Youth%20Investment%20Fund%20%28YIF%29%20aims%20to,wellbeing%2C%20and%20skills%20for%20work%2C%20employability%20and%20life.>
- ^{xix} <https://labour.org.uk/press/labour-will-open-a-sure-start-centre-in-every-community-to-unlock-the-potential-of-all-our-children-and-radically-expand-childcare-to-save-families-thousands-of-pounds-a-year/>
- ^{xx} See p.3 here: https://www.london.gov.uk/sites/default/files/final_lge_pdf_190122.pdf