



Shattered lives, stolen futures

**The Jay Review of
Criminally Exploited Children**

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Safe and happy childhood



Action for Children protects and supports children and young people, providing practical and emotional care and support, ensuring their voices are heard, and campaigning to bring lasting improvements to their lives.

Acknowledgements

The panel would like to thank Paul Carberry and the team at Action for Children for commissioning this Review and for their support in the drafting of this report. We would also like to thank every professional, young person, mentor and parent who contributed their time, experience and invaluable insight.

Language and terminology

Content warning

This report contains details, descriptions and first-hand accounts of violence, sexual assault, exploitation, drug use and traumatic events experienced by children and young people. Some first-hand accounts also include strong language.

All names and some identifying characteristics of children, young people and families have been changed to protect the anonymity of those who spoke to the Review.

Children and young people

The relevant literature on the criminal exploitation of children uses the terms ‘children’, ‘young people’, ‘adolescents’ and ‘young adults’, not always consistently in meaning or legal status. In this report we have used the word ‘child’ in its legal definition of any person up to the age of 18, unless there are clear reasons to do otherwise (for example, when specifically discussing adolescents).

Glossary and list of abbreviations

National Referral Mechanism (NRM). The process for referring children and adults to the Home Office for a decision on whether the individual is considered to be a victim of modern slavery (including criminal exploitation).

Single Competent Authority (SCA). The authority responsible within the Home Office for making decisions on cases referred to the NRM.

Special educational needs or disabilities (SEND).

Neurodiversity/neurodivergence. A term used to describe a range of differences in the way someone’s brain processes information, including Attention Deficit Hyperactivity Disorder (ADHD), Autism Spectrum Disorder (ASD), dyslexia and dyspraxia.

Deprivation of Liberty (DoL) Order. A legal Order in England and Wales that makes it lawful for a child to be deprived of their liberty, for example in a secure children’s home, for reasons of welfare, youth justice or mental health.

Child criminal exploitation (CCE).

Child sexual exploitation (CSE).

Child sexual abuse (CSA).

National Crime Agency (NCA). The UK’s law enforcement agency against organised crime, human, weapon and drug trafficking, cybercrime and economic crime that goes across regional and international borders.

Organised criminal groups (OCGs) and serious organised criminal groups (SOCGs). Defined by the Home Office as people who work together on a continuing basis in order to plan, coordinate and conduct serious crime.

County lines. A type of criminal exploitation where gangs send a child away from their local area to sell drugs. Gangs coordinate activity through dedicated mobile phones (burner phones).

Debt bondage. A form of entrapment when a victim owes money to their exploiters and is made to repay their debt, either financially or through another means.

Crown Prosecution Service (CPS). The public prosecution service for England and Wales.

Public Prosecution Service (PPS). The public prosecution service for Northern Ireland.

The Crown Office and Procurator Fiscal Service (COPFS). The public prosecution service for Scotland.

United Nations Convention on the Rights of the Child (UNCRC). A legally-binding international agreement setting out the civil, political, economic, social and cultural rights of every child. The four Children’s Commissioners of the UK report jointly to the UN Committee on the Rights of the Child.

Language and abbreviations

The Children’s Society has produced a useful document on terms to avoid when discussing child criminal exploitation. This includes language that suggests victims are complicit in their abuse or have ‘put themselves at risk’.¹ We have incorporated this advice where possible into this report.

Barnardo’s recommends not using the acronyms of CSE (child sexual exploitation), CSA (child sexual abuse) or CCE (child criminal exploitation) in public-facing documents as this can risk simplifying children’s experiences, while acknowledging that it is often referred to in this way as a useful shorthand by practitioners.² Key government reports, including the Report of the Independent Inquiry into Child Sexual Abuse, also follow this convention. We have done so in this report except where part of a quote.

Throughout the report we deliberately use the phrase ‘criminal exploitation of children’, which better reflects the reality of the harm caused and does not carry the implication of child criminality.

1. Foreword

The facts of criminal exploitation paint a stark picture: tens of thousands of children and young people across the country are controlled and manipulated by criminal gangs, while countless more are at risk. The toll on these young lives is immeasurable, leading to serious physical harm, long-term trauma and criminalisation. Children are paying with their freedom, their childhoods and their lives.



In response to this crisis, Action for Children launched the Jay Review of Criminally Exploited Children last autumn. Our aim was to learn from what’s working well to protect children from exploitation and determine what more can be done.

These groups, ranging from mapped Serious and Organised Crime groups to urban street gangs, engage in a range of illicit activities from drug trafficking to cybercrime, leaving a trail of devastation in their wake. Their recruitment tactics are sophisticated, targeting those who appear extremely vulnerable and easily controlled.

Through the lived experience contributed to the Review, we gain insight into the insidious nature of exploitation and the profound impact it has on children, their families and wider society.

The time and expertise contributed by so many practitioners, young people and parents to the Jay Review is a testament to our collective determination to prevent the abuse of children through criminal exploitation. I extend my sincere gratitude to all those who have contributed to these discussions and to Professor Jay and the panel for facilitating the depth and range of insight gathered.

Action for Children is committed to our vision that every child and young person has a safe and happy childhood and the foundations they need to thrive, this includes being free of exploitation and abuse. The recommendations in this report are both timely and much needed.

We look forward to building our collective voice for change.

**Paul Carberry, Chief Executive
Action for Children**

Through our Serious Organised Crime Early Intervention Service, operating in key locations across the UK since 2012, Action for Children has been at the forefront of efforts to prevent vulnerable children from being ensnared by criminal activity. Yet, as this report underscores, much more needs to be done.

Our efforts are hindered by significant challenges. The lack of a consistent definition of child exploitation, inconsistent data sharing across the UK between agencies, and the absence of clear national leadership exacerbates the difficulty in tackling this pervasive issue. There is a pressing need for early intervention and support for children at risk, coupled with greater education and awareness among educators and communities.

What has become evident through the Review is the astuteness with which criminal groups identify and exploit vulnerable children and young people.



2. Introduction

The criminal exploitation of children is a complex type of child abuse where a young person is manipulated or pressured to take part in criminal activity. It takes a range of forms including dealing and transporting drugs or weapons (including county lines), growing cannabis, theft and burglary and street crime such as begging and pickpocketing. Exploited children often experience multiple types of abuse at the same time, including violence, threats, emotional and sexual abuse.

Over the past decade, the criminal exploitation of children has transitioned from an ‘emerging concern’ to a priority for child protection, police, schools and local support agencies. Terms like ‘county lines’ have gained traction in the media, contributing to a broader public awareness of criminal exploitation. Research reviews, changes to national policy and guidance and service restructures have been undertaken to tackle exploitation, with several government programmes aimed at funding innovation and improvement in adolescent safeguarding and preventing youth violence.

The link between serious youth violence and forms of criminal exploitation has been made with increasing evidence over the past 10 years³, with the National Crime Agency stating that violence at street level is often linked to drugs supply and county lines, a form of criminal exploitation where gangs send a child away from their local area to sell drugs.⁴

The UK government’s Beating Crime Plan notes that changes to the drugs market such as county lines are ‘fuelling’ increases in serious youth violence.⁵ Tackling child exploitation and county lines has been a key strategy across the Violence Reduction Units in England, Scotland and Wales since their inception. Additionally, the implementation of the Serious Violence Duty in England and Wales in 2022 means local authorities are legally obligated to work together in addressing the adverse effects of serious violence, including criminal exploitation.⁶

Despite this, the crisis of exploitation is getting worse.

7,432

referrals relating to children in 2023 were made to the National Referral Mechanism (NRM), the framework for identifying and referring potential victims of modern slavery and criminal exploitation, **an increase of 45% since 2021.**⁷



Over the same period,

14,420

children in need assessments in England recorded criminal exploitation as a risk of harm, **an increase from 10,140 in 2022.**⁸



Too many young lives are being lost and blighted as a result, and too many families are not receiving the help they need.

Over the five years between April 2018 and March 2023,

568

young people aged 16-24 were violently killed in England and Wales⁹ and 24 in Scotland.¹⁰ The vast majority were killed by being stabbed.



Over the same period in England and Wales there were 19,399 cautions or convictions of children under 18 for possession of a knife or offensive weapon¹¹ in addition to 20,973 drug offences.¹² The 2020 Child Safeguarding Practice Review Panel examination of 21 cases involving death or serious harm to children who were being criminally exploited found that 81% of incidents involved a knife.¹³

In February 2024, the Metropolitan Police was found by an inspection by His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) to be ineffective in its handling of criminal exploitation of children, with half of the investigations examined graded as inadequate – a concerning finding for a force handling the largest number of county lines and serious youth violence cases in the UK.¹⁴



Action for Children delivers services that help prevent vulnerable young people from becoming involved in criminal activity. Since 2012, its Serious Organised Crime Early Intervention Service (SOCEIS) has helped young people at risk in eight areas of the UK, including Glasgow, Edinburgh, Newcastle and Cardiff. In November 2023, Action for Children launched the Jay Review of Criminally Exploited Children to gather evidence from expert witnesses on the scale and nature of the criminal exploitation of children, the legal and policy response across the UK and the support available to victims.

The Review was chaired by Professor Alexis Jay CBE, chair of the Centre for Excellence for Children’s Care and Protection and former chair of the Independent Inquiry into Child Sexual Abuse. Professor Jay was supported by Simon Bailey CBE QPM, the former Chief Constable of Norfolk Constabulary and former member of the Child Safeguarding Practice Review Panel, and Charles Geekie KC, a barrister specialising in areas of the law relating to children and a Trustee of Action for Children.

Over four days of hearings in November 2023, the panel heard 25 hours of evidence from witnesses in person and via video footage. In total, the Review has received more than 100,000 words of evidence from 70 organisations or individuals, including young people, parents and mentors with lived experience of exploitation. A wide range of practitioners and senior leaders have contributed from children’s services, education, local government, charities, inspectorates, academia and the police and youth justice systems across the UK, including the Children’s Commissioners from all four nations.

'It's the loneliest place in the world to be'

Natalie and her son Liam

Liam was fatally stabbed at the age of 18. He had attended one of the best secondary schools in his area and was doing well until the pandemic.

During lockdown, he formed a new friendship group linked to criminality and drugs and began to go missing. His parents reported this to the police. Liam told his mum that he had been asked to hold money in a wallet; he lost the wallet and was then in debt to his friends. He began to lose things regularly (his phone, a bike, his house keys) as well as having unexplained new clothes. After being found by the police in possession of drugs and a mobile phone used for dealing, Liam was referred to Action for Children. In the months leading up to his death he had withdrawn from involvement in criminal activity. Liam's mother, Natalie, gave her view on what needs to change:

"From the time I was first extremely worried about my son I asked everyone I came into contact with – GP, social work, police, hospital staff, school liaison officers, intervention staff – one question: What have you seen work? None of the professionals who are dealing with the fallout have any idea of what works.

We are ill-equipped to protect and respond. We simply don't have the knowledge or the tools to tackle this effectively. The dangers faced by young people have changed but our approaches haven't. If the kid isn't from a single-parent or a deprived background, services simply don't recognise the danger. People said things like 'he'll grow out of it', 'he's just testing his boundaries'.

This city is awash with cannabis. They want kids using it so they can sell them the next drug and then the next drug. It is not harmless. Criminals specifically targeted school kids with it throughout lockdown.

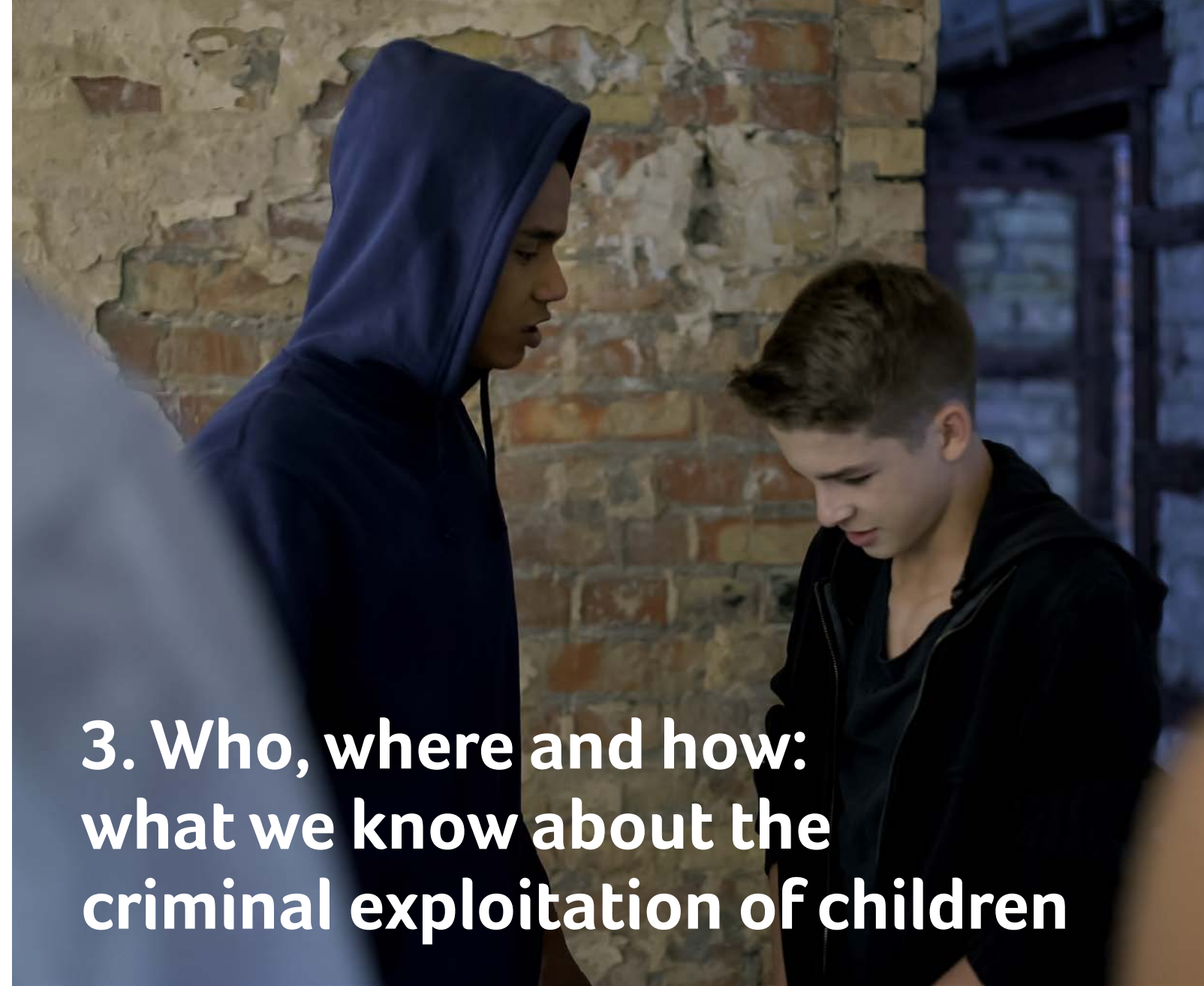
They aren't giving up that market now. It is pervasive harm targeted at kids which they can buy in school or have delivered to their doorstep while mum makes dinner. There are tell-tale signs. Schools should not be suspending pupils caught smoking cannabis or falling asleep in class.

The dealers want kids to supply for them. They target fit kids with bikes and scooters. They don't give a hoot how much school they miss, what relationships it destroys, whether those kids end up in hospital or sleeping rough. People don't know what is going on until their kid is drowning in something toxic and that's the loneliest place in the world to be.

A parent with concerns needs to be able to tell someone who will believe them and who can help and that place doesn't exist just now. The first time I felt like I was being listened to by someone who totally got it was when the youth justice sergeant visited and then when Liam was introduced to an Action for Children peer mentor.

We need police who are focused on removing kids from harm and not using them to get up the criminal chain. The point where I knew the police could no longer help me was the point when they talked about video interviewing Liam to try and get information on who was involved. None of that was going to help my child who was in crisis."

**“
Lastly, we need hope. I think that comes from facing the issues, building knowledge, and working out some of the answers to the question I pestered everyone with: what have you seen work?**



3. Who, where and how: what we know about the criminal exploitation of children

The criminal exploitation of children is a form of child abuse in which a young person is manipulated or pressured to take part in criminal activity, often through threats of violence alongside serious physical, emotional and sexual harm.

It encompasses a range of forms including dealing and transporting drugs (including county lines) or weapons, cannabis cultivation, forced home invasion, theft and burglary and compulsory labour, for example being forced to work in shops, factories or restaurants for no pay.

County lines. County lines is a drugs distribution model, described by the UK government as the most violent and exploitative distribution model yet seen in the drugs market.¹⁵ It involves gangs and organised criminal networks importing and distributing Class A drugs between cities, towns and rural areas within the UK using dedicated mobile phone lines.

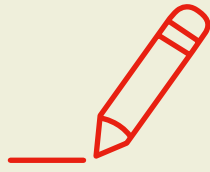
The majority of lines originate from areas covered by the Metropolitan, West Midlands and Merseyside police forces. Lines run from these areas to the whole country, with the majority of county lines in Scotland originating from one of those three areas.¹⁶

A key component of the business model is the recruitment and exploitation of children to act as 'runners' to transport large amounts of drugs, cash and weapons long distances to suburban and rural areas. Children are often forced to conceal drugs or sim cards within their bodies in order to transport them without detection. There have been calls for this practice, known as 'plugging', to be recognised as a specific form of sexual assault.¹⁷

County lines is the most well-known type of exploitation and constitutes a large proportion of exploitation involving children.

41%

of referrals of children to the National Referral Mechanism (NRM) for criminal exploitation involved county lines in 2023.



The majority of research, policy and political discourse is directed at disrupting county lines activity; however, in recent years the understanding of other forms of exploitation has grown alongside awareness of the complex links between different forms of criminal and sexual exploitation, abuse, grooming, youth violence and trafficking. These categories overlap extensively, with victims of criminal exploitation often forced or coerced into committing multiple types of offence or subjected to multiple forms of harm. The Home Office guidance on child criminal exploitation focused almost exclusively on county lines in its 2018 edition. This was updated in October 2023 to include a far fuller and more nuanced picture of the ways in which children may be exploited.¹⁸

Carrying weapons. Victims of exploitation are exposed to or forced to use a wide variety of weapons, including knives, firearms, acid and CS spray. Children may be forced into transporting weapons and/or feel the need to carry weapons in order to protect themselves.

Forced cannabis cultivation. People forced into growing cannabis are often trafficked to the UK illegally and forced to work to repay the cost of their travel. Victims are held in a property against their will and required to water and tend to cannabis plants. This form of exploitation is more likely to affect older children and adults.

Forced home invasion. Also called ‘cuckooing’, this involves exploiters taking over the properties of vulnerable people to act as a base for criminal activity including drug dealing and sexual exploitation. This is a common characteristic of the county lines business model and can happen in a range of settings such as rental and private properties, student accommodation, young offenders’ institutions and commercial properties.

Forced begging, busking, shoplifting or pickpocketing. Migrant children being forced to shoplift, beg or busk under the supervision of adults is an emerging trend in the UK.¹⁹ Children who have been trafficked into the country may also be exploited to steal pre-selected high value items.

Financial exploitation. Financial exploitation involves money laundering, coercing or manipulating children into moving money through physical cash or bank and cryptocurrency accounts. It can also involve victims being pressured into opening a bank account which is then controlled by the exploiter and any money paid in (e.g. state benefits) is taken from the victim.



3.1 The scale of criminal exploitation of children in the UK

The lack of a formal definition of the criminal exploitation of children means there is no reliable data collection on the overall scale of the problem across the UK. Instead, a patchwork of data is available from multiple sources. The most significant in number are data from the NRM, social care referrals and police statistics. However, the lack of legal definition leaves room for interpretation regarding what constitutes child criminal exploitation.

Data from the NRM. In 2023, 7,432 referrals relating to children were made to the NRM, a 45% increase from the 5,468 referrals in 2021.²⁰ This included 6,657 referrals for children in England, 348 for Wales, 306 for Scotland and 110 for Northern Ireland.

The most common reason for referral (42%) was for criminal exploitation, with

1,280

related to county lines.



Since recording began in 2019, criminal exploitation has been the most commonly reported type of exploitation for potential victims of modern slavery referred to the NRM from across the whole UK.²¹

Social care referrals. In the year ending 31 March 2023 there were 14,420 child in need assessments in England recording criminal exploitation as a factor, an increase from 10,140 in 2022.²²

There is significant overlap with child sexual exploitation – in 2021-22 there were

16,000

instances in which sexual exploitation was identified in children in need assessment.²³



It is worth noting that these figures are both a product of increase in prevalence and increase in identification.



Police statistics. Home Office figures from December 2023 state that since the launch of the County Lines Programme in 2019, which includes the Metropolitan, Merseyside, West Midlands, Greater Manchester and British Transport Police forces, 5,165 county lines had been closed, with 15,623 people arrested and 8,011 (adults and children) referred for safeguarding.²⁴

In 2021-22, 137 county lines gangs were identified in London alone, with 365 children linked to them.²⁵ Police Scotland recorded 236 police concerns in the year to February 2023, the first year in which a marker for child criminal exploitation was included on its Interim Vulnerable Persons Database.²⁶ Of these, 167 were categorised as a ‘child concern’, applied to any child about whom the police have a concern. And 69 were categorised as a ‘youth offending child concern’, applied to a child for whom the police have concerns around their offending behaviour so that data can be shared with partners.²⁷

Many children who are being exploited or groomed fall through the cracks of statutory support and are therefore not identified in official statistics.

Research by the Children’s Commissioner for England in 2019 based on the 2018 Crime Survey for England and Wales estimated that up to 27,000 children were affiliated with criminal gangs and up to 120,000 children in England faced risk factors linked to exploitation.²⁸

The Youth Endowment Fund's 2023 survey of children's experience of violence found that

47%

of children reported having been a victim or witness of violence in the past year, with 5% describing themselves as members of a gang.²⁹



Which children are being exploited?

Criminal exploitation can affect anyone – Section 4 of this report includes evidence from children and parents from a range of backgrounds on the impact of exploitation on their lives. Any child can become a victim of exploitation.

However, at a national level, there are patterns in the characteristics of children who are known to be exploited:

- Approximately 20% of people identified as being involved in county lines are children, with an average age of 15.8.³⁰ There is evidence that, to avoid detection, children as young as primary school age are increasingly being targeted.³¹
- The majority of children (80%) referred to the NRM in 2023 were boys.³²
- Black and minority ethnic children are overrepresented in statistics on criminal exploitation across all types but particularly in county lines.³³
- While the majority of victims are UK nationals (64%), children who do not have immigration status in the UK or do not speak English are particularly vulnerable to exploitation.³⁴

The extent and nature of the criminal exploitation of girls remains unknown. National data suggests that boys are more likely to be exploited criminally, and girls sexually. There may be multiple factors behind these statistics, including boys being assumed by police to be more likely to be criminally exploited, and girls being more fearful of seeking help. Similarly, minority ethnic children may be both more likely to be targeted by exploiters and more readily identified by police and other agencies due to racial bias.³⁵

Multiple contextual factors may increase a child's vulnerability to exploitation. In the Children's Commissioner for England's analysis of referrals to children's social care due to gang involvement,³⁶ children were, in comparison with children referred for other reasons:

- Eight times more likely to be misusing substances.
- More than twice as likely to self-harm.
- 95% more likely to have emotional health issues.
- 77% more likely to have mental health issues.
- 41% more likely to have a parent or carer misusing substances.
- 48% more likely to have experienced neglect.
- 39% more likely to have been the victim of domestic abuse.
- Nine times more likely to have previously gone missing.
- Six times more likely to be in alternative education.
- Five times more likely to have been permanently excluded from mainstream education in the year before referral.

'I don't understand, you're just a normal family'

Amanda and her son Ryan

Ryan has ADHD and has been on medication from the age of 8, which Amanda believes made him 'a clear target' for exploitation.

Though he did well at primary school, the family was not listened to about their preferred secondary school and he struggled to settle. Ryan's behaviour changed significantly after the death of a close relative, and he became withdrawn and angry, eventually refusing to go to school. He was declined from a number of other schools in the area due to his ADHD diagnosis. After a period outside education, he joined a Pupil Referral Unit where he became involved with a gang and came to the attention of the police.

Ryan began disappearing, returning with new clothes and unexplained injuries. Amanda sought help from children's services but felt dismissed: 'I'd never spoken to social services in my life. The social worker said to me: 'I don't understand, you're just a normal family''. Amanda later discovered that none of her conversations with police or social services over a two-year period had been properly logged. She began to be isolated from her support network. 'Friends didn't turn against me, but they pulled back. They didn't want their children mixing with my son.'

A moment of crisis hit when the family was threatened over a debt that Ryan owed:

"He had been in his room for days, sullen and quiet. I was in the supermarket. He phoned me and said, 'Do not move mum, go to security, you're being followed.' It all came out then. There was a thousand-pound debt. One night they were knocking on the door, Ryan got into a cupboard, I stood at the door with my husband. My husband opened the door, there was a man there with a group of other men around. He said, 'Your son owes me money and that means you owe me money.' He was threatening, saying things like, 'Nice car you've got, shame if anything happened to it.'"

Amanda and her husband sent Ryan to stay with a family friend for six weeks and, later, with a friend in a different county in order to attend college. Each time, Ryan was found by his exploiters. This culminated in a planned hit-and-run attack that left him in a wheelchair for six months and with long-term damage to his knee. He was threatened while in hospital:

"We gave him an iPad in hospital to FaceTime us. By the time his sister had visited that evening the gang had already found him and sent someone to the hospital to ensure he stayed quiet. He wouldn't talk."

Despite Amanda's efforts to reconnect with Ryan, he remained in contact with his exploiters. After being caught by police in possession of drugs and a knife he was subject to electronic monitoring. Amanda found legal help from a solicitor specialising in neurodiversity and Ryan disclosed the extent of his exploitation, including threats to his family and the serious violence he had been subjected to. His solicitor provided details to The Salvation Army and Ryan was referred to the National Referral Mechanism.

Ryan was awaiting trial for his involvement in the gang's activities, but his case was dropped after a 'conclusive grounds' decision through the National Referral Mechanism that stated he was a victim of modern slavery.

3.2 The operating models of exploitation: serious organised crime and chaotic local gangs

As the understanding of criminal exploitation has grown, a complex picture of the operating model of perpetrators, gangs and criminal organisations has developed. There is a wide spectrum of criminal activity linked to child exploitation, from local street gangs dealing drugs on a ‘postcode’ model, to serious organised crime groups (OCGs) operating across national borders.

County lines is referred to regularly by government strategy and national agencies as being the link between these two, with well-networked, well-funded professional groups operating at a national or international level to bring large quantities of drugs into the UK, and a chain of command running down to local areas in which children provide an expendable workforce.

Scottish Government Practitioner Guidance on criminal exploitation notes that there are 97 mapped serious organised crime groups operating in Scotland and that ‘most of these groups are involved in the production, procurement, and distribution of controlled drugs, with other activities involving county lines and human trafficking’.³⁷ The model maximises profits while creating a buffer between perpetrators and the criminal act of dealing drugs. It is a business model described as ‘ruthless’³⁸ in which ‘young people do the majority of the work and take the most risk’.³⁹

“
The unpalatable fact is that Organised Crime Groups have considerably more resources available than professional services do; organised crime is by its very nature a highly organised endeavour. Unlike the children’s sector, organised crime groups are able to continuously invest in innovation, finding new ways to undermine law enforcement and safeguarding professionals. ... Unlike some professionals and policy-makers, OCGs seem to deeply understand the pressures, drivers and developmental characteristics of young people – and use this knowledge for evermore sophisticated entrapment.”

Research in Practice

However, this picture does not necessarily reflect the full experience of those working with local communities to disrupt perpetrators and safeguard children. Witnesses to the Review made a clear distinction between the organised, well-funded model of serious organised crime, and the more chaotic dynamics of urban street gangs. These gangs may operate in a more or less organised and hierarchical way, with children ‘rising through the ranks’.⁴⁰ Some are becoming more sophisticated, for example in their use of cryptocurrency, while others operate at a local postcode level with a ‘hand-to-mouth’ financial model.⁴¹

There is no reliable data on the proportion of exploitative crime undertaken by OCGs vs urban gangs, and this lack of clarity is not helped by the inconsistent and interchangeable usage of the term ‘serious organised crime’ by the Home Office and, on occasion, police forces. At its widest, for example in the government’s 2018 Serious and Organised Crime Strategy, it is defined as individuals planning, coordinating and committing serious offences, whether individually, in groups and/or as part of transnational networks.⁴² ‘Serious offences’ in this context can include any offence relating to Class A drugs.

This picture is perhaps even more complex in Northern Ireland, where the continuing community trauma from the Troubles means that ‘[u]nlike organised crime networks in other areas, the potential reach of paramilitary and organised crime structures in Northern Ireland is wider, with influence extending into cultural and social life’⁴³, presenting a ‘clear and present danger’ to young children.⁴⁴

That inconsistency is, in part, a product of how the response to the issue of the criminal exploitation of children has evolved. Scotland’s Serious Organised Crime strategy 2015 and the UK’s Serious Organised Crime Strategy 2018 were the first to consider responses to child criminal exploitation. Initially, this was described as a harm linked to serious organised crime. Over time, understanding of exploitation has shifted to recognising exploitation can occur range of settings and the harm caused is on a continuum. Moreover, it is only more recently that safeguarding policy has included reference to child criminal exploitation and focused on it being a safeguarding, as opposed to law enforcement issue.

Scottish practitioner guidance now notes that ‘not all criminal exploitation is linked to serious organised crime. Perpetrators can be individuals who exploit children or adults within their families or communities. The identification of these victims, and the response, should be the same’.⁴⁵

We agree entirely with the conclusion of this statement and would add that the lack of involvement of serious organised crime does not make the exploitation any less serious for the child. Regardless of the structures within which exploitation occurs, our concern is responding to the harm to the child. However, any unified approach to tackling exploitation must include a shared understanding of its perpetrators and operating models, in order to deploy resources effectively in predicting, identifying and disrupting their activity. As a recent example, the 2024 HMICFRS report into the Metropolitan Police’s handling of exploitation noted that while ‘for those cases linked to serious and organised crime, the force has a significant resource in the modern slavery and child exploitation team’, cases of exploitation at a community level and relevant child safeguarding are allocated to non-specialist local investigation teams.⁴⁶ A much more sophisticated and nuanced mapping of the ways in which exploitation is planned, operated and funded is needed to safeguard children effectively.



'I slept with one eye and one ear open for years and years'

Vicky and her sons Will and Gabriel

Will has received mentoring support from Action for Children. He has accrued over 30 charges including serious assault and possession of offensive weapons.

He has been connected to a known dealer linked to a mapped organised crime group in the area. His younger brother Gabriel was identified as being vulnerable to exploitation as a result of his brother's involvement and has also been involved in low-level offending. Their mum, Vicky, spoke about how hard it had been for her to manage her children's behaviour outside the home.

"My boys were around 13 when they were referred here. The background that I have, being involved in the community, I was aware of how exploitation works. I do think there's different levels, where the young person is threatened or groomed. Another level is maybe gang members saying we'll protect you if you do this for us, lulled into the false idea that 'we'll look after you, we'll protect you'. They'll take risks, they can be easily exploited. These gangs are offering them money, phones, the latest gear, drugs. Once you're in it, it's hard to escape.

When they started racking up the charges, when the police started coming round a lot, the school were informed, social work, young people's services. And then their names started coming up in community meetings, so there was a lot of services in contact with us.

You're trying to be good cop and bad cop, they're going through puberty, their brains aren't fully developed, all that stuff. But when you're stuck in the middle of it all, the rationality goes out the window. So I'm on their backs all the time, they're thinking I'm nagging so they're shutting down, not telling me anything. I bought drug testing kits off the internet.

We had the police round a lot. Every time the door went, we thought 'oh no'. At first when it was petty stuff the police were alright, but then I felt as if the boys were being victimised, and I felt like they were looking down on us as well, so I put a barrier up. I didn't want to deal with the police. The same went for young people's services and the social work department. I felt like, you're meant to be there to support us, but actually you're making me feel like a really shit parent. I didn't feel supported, I felt like they were judging us.

Action for Children was like a turning point for the kids and me as a parent. I was able to see that there are reasons why this happens. I got loads of advice and support and was never ever judged, that was the main thing. So I felt safe coming here and speaking, and I was able to say things, able to say how I was feeling and speak to other parents as well, which was really, really important."

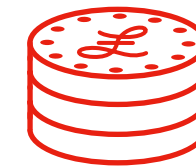
3.3 The economic cost of criminal exploitation

The 2020 Youth Violence Commission estimated the total economic and social cost of serious youth violence across England and Wales in the year 2018-19 was between £0.7 billion and £1.3 billion⁴⁷ when including costs associated with the police, criminal justice system, health service, victims' services, physical and emotional harm and lost economic output.

The UK government's Serious and Organised Crime Strategy estimates the cost of organised crime (including county lines) at

£47bn

a year, noting that a single county line is able to generate £800,000 of income annually.⁴⁸



Taking adolescents into care is particularly costly, with suitable foster placements requiring high-cost residential care at an annual average cost of £200,000.⁴⁹ Older children are placed in secure units, children's homes or semi-independent accommodation more often than younger children.

In 2021 the Independent Review of Children's Social Care estimated the lifetime social cost of adverse outcomes for all children who have ever needed a social worker at £23 billion a year,⁵⁰ comprising lost productivity, costs to public services and the impact of poor wellbeing, drug and alcohol misuse.

Evidence submitted to the Review demonstrated that the failure to address the safeguarding and wellbeing needs of children at an early stage results in much larger costs for much more intensive interventions later in a child's life.⁵¹ We cover the importance of early intervention for children at risk of exploitation in section 5 of this report.





4. The lived experience of exploitation

© Open Aye

Throughout the Review we heard the devastating impact of exploitation on children, their families and communities. We heard the speed with which a young person can become trapped in exploitation, and the difficulty they face in extracting themselves once the cycle of exploitation has begun.

From parents, we heard the fear and desperation of witnessing their children being groomed, coerced and threatened into criminal and dangerous activity. We heard that parents can feel judged and abandoned by a complex web of services, left to cope with their child's behaviour until it escalates to the point of crisis.

From professionals and practitioners we heard the dedication and devotion of those working to care for children in a system that is fragmented and frustrating at every turn, and the importance of trusting relationships both with children and families and across professional boundaries.

Finally, we heard the pride of the mentors with lived experience who support children still caught in cycles of exploitation and violence, and their belief that every child can find their way to a better life.

4.1 'The odds are against them': Children's vulnerabilities to exploitation

"It's any kid they come across, they will try and suck them into what they do as a lifestyle. Like they aren't going to just look at a kid and be like, oh, not him today. They'll do some other kid. No, it's every kid that walks past a group of boys will get sucked in."

Sy, young person with experience of exploitation

Any child can be a victim of exploitation. There is no single cause that leads to one child being exploited when another is not, much like other forms of abuse. Witnesses noted that it was vital to 'hold in mind that this form of harm can ensnare even the happiest, healthiest and well-loved children and young people'.⁵² However, the evidence is clear that there are identifiable vulnerabilities that can increase a child's risk of exploitation. Some stem from the child themselves, such as neurodiversity or mental health challenges. Others are rooted in familial or environmental factors, such as poverty, bereavement, or parental substance abuse. Additionally, societal dynamics, including racism, adultification, and criminalisation, can contribute to a child's vulnerability.

"There is a need for professional humility here. It is tempting to assume that what we see in our own service is a generalisable picture, rather than simply being a picture of who is able to access that service."

Research in Practice

These factors cluster and intersect in multiple ways. Witnesses emphasised that while these factors themselves may not inherently make a child vulnerable, they do so when support structures around a child are lacking. The pandemic significantly increased childhood vulnerability, with more children, particularly teenagers, classified as vulnerable and experiencing domestic violence, addiction, or poor mental health. The pandemic led to a decrease in the age of exploited children, with more 12- to 14-year-olds being exploited through criminal activity and some in that age range 'semi-managing county lines'.⁵³

".....
For certain he would never have been there if society hadn't locked down, leaving young people the prime target for criminals. I'm of the view we were and are ill equipped to protect and respond. The dangers faced by young people have changed but our approaches haven't. If the kid isn't from a single-parent family or a deprived background schools, police, GPs, social work etc simply don't recognise any danger. ... The general UK policy is to shrug and assume they'll grow out of it on their own."

Natalie, parent

Trauma, bereavement and mental health

661,000

young people received at least one contact with Children's and Young People's Mental Health Services (CYPMHS) in 2021-22, representing less than half of children with a probable mental health disorder.⁵⁴



There is strong evidence that children with poor mental health or an exposure to adverse childhood experiences are at greater risk of being criminally exploited. Exploiters often target those with poor emotional wellbeing, stemming from neglect, abuse, bullying or bereavement.⁵⁵ In addition, some children turn to alcohol or substances to self-medicate, which can increase their risk of accruing debts.⁵⁶

We heard many stories of significant trauma, described by one evidence submission as 'a golden thread'⁵⁷ in the lives of exploited children. Often, a series of bereavements, family discord, and mental health challenges precede a child's exploitation. The narratives frequently mention feelings of anger, grief, and isolation as the backdrop against which exploitation unfolds.

“When I was younger, my brother passed away suddenly. ... I was about 10 years old at the time, ... We were one of seven, I was the second youngest, and so that really, really devastated the family. During that period again, under 11, one of the teachers in my school, my favourite teacher, she passed away. I also had my dad’s sister, who died of cancer, and a friend who died. ... my mother developed some severe mental health issues, which I think fed through to my sister. They were both undiagnosed, so most of my childhood years was a home of mental instability where it was my normal. When I look back now: wow, no wonder I didn’t want to stay home. No wonder I couldn’t be in that environment. I was bursting to get out.”

Mo, former mentor with Action for Children

“There was a struggle at home because my mum had lost her husband, my sister had lost a dad and I had lost my dad... and actually, to be honest, it was just rebellion.”

H, mentor with Action for Children

A fractured or negative experience of school

A fractured or negative experience of school can significantly impact a child’s wellbeing and vulnerability to exploitation. Mo’s account illustrated the destabilising effect of changing schools, which left him feeling disconnected and unwanted. Despite his academic ability, Mo’s experience with a strict private school led to his expulsion for fighting at the age of 14:

“We also moved homes three times. Multiple schools. That means feeling like you haven’t got a gang, feeling you haven’t got a group, feeling unwanted, undesirable. I’m a young person. I just go where my family goes. I’ve got no choice in this. Age 14, I was expelled from school. I actually went to a private school because I was actually quite smart, but what happened was it was very, very strict, so I had a fight or something and I was out.”

Mo, former Action for Children mentor

Throughout the Review, witnesses emphasised the vital role of schools as a protective factor in children’s lives. School provides structure, trusted relationships, an environment to deliver targeted support and early identification of potential risks.

Concerns were raised about the rising rates of exclusions and school absences among children with special educational needs, and the subsequent risk of these children falling through the cracks. School attendance rates have not returned to pre-pandemic levels, with a quarter of children still persistently absent.

145,000

children are severely absent, meaning they’re at home more than they’re at school.



“The more things we’ve got open, the more things we can do with them to keep them away from things. Schools are too quick to pull the trigger and exclude them, which gives them a lot more free time during the day. Sometimes getting a young person into alternative provision is like pulling teeth. And in that time all sorts could happen for that young person, which makes the provision a lot harder to get them into because they’ve already fallen into a lifestyle where there might be getting new clothing or money in the pocket or, you know, supplying their own habits.”

R, mentor with Action for Children

Exclusion or removal from mainstream education settings was described by some witnesses and by young people in terms of additional trauma. The effect of exclusion was seen to be two-fold – both removing an important layer of protection from young people, and creating an increased sense of isolation, rejection, failure and low wellbeing. Witnesses linked school exclusion as being part of a wider alienation of children from society.

“The trauma that these wee guys are facing, some of the struggles these wee guys are facing, we need to be accommodating of that. They’re getting kicked out of school for being loud and aggressive, and as soon as they’re expelled they’re a target for these exploiters.”

P, mentor with Action for Children

For some, like Kyle, school had itself been a traumatic experience. Kyle was permanently excluded from school and has had difficulties with securing placements since, due to the risk he is seen to pose to others:

“I’ve always been in and out of school but from about eight I stopped going, then I went to a different one for a few months and I haven’t been back since. I’ve got ADHD, I’ve got Asperger’s and I’ve always been a bit of a troublemaker really. I never had a proper school, I was in this school where you got put in physical restraints.”

Kyle, 15

Contact with the criminal justice system

Involvement with police and the youth justice system is not only a consequence of exploitation but becomes a risk factor for further exploitation. Having previous contact with the criminal justice system, even for minor unrelated offences, is a risk factor for later exploitation.⁵⁸ In addition, children with connections to criminal activities or gangs, often through peers, older siblings or family members, face an increased risk.⁵⁹ Witnesses described a recurring pattern of offending and imprisonment that seemed insurmountable to break free of alone:

“When you leave prison you’re coming back out to your problems. In prison all your problems disappear. Your addiction disappears, criminality disappears, you’ve got warm showers, a warm bed to sleep in and you’ve got peers around... you start becoming comfortable. There’s an element of safety. So when you’re coming out, you’re conscious you’ll probably be homeless within the first couple of days. You’re leaving all your peers behind.”

P, Action for Children mentor



Numerous accounts depicted children enduring distressing or traumatic encounters with the police, leading to a breakdown in trust with services that should serve as potential avenues of support. The Children's Commissioner for England shared a case study of a boy, now 19, who was arrested multiple times from the age of 12 and strip searched four times in custody. His lack of trust in the police was a barrier to him receiving support as a victim of exploitation.⁶⁰

"It was a very confusing and traumatic process. ... So the first time I was arrested was actually in my school, so I was led out of the school in handcuffs and taken into a police station. And that is where I was strip searched. ..."

I was incredibly young at my first point of arrest and there was nobody that came and checked up on me. I had a lot of uncertainties, a lot of worries. I'm sitting in the cell, thinking, 'Oh, my God, my mum and dad are going to kill me. Am I going to prison?' I didn't understand what the law was. [...] Obviously, you're read your rights and you're entitled to a solicitor and all of that sort of stuff. But at that age of 12, I didn't even know what a solicitor at all was. ..."

And if I had a youth worker at that point, I would have said, "Do you mind if he was present or someone like that?" I would have. I definitely, without a doubt, would have liked to [have a] familiar face there. I don't know if I would have wanted to put my mum through that because it's not nice, it's not a nice thing for anyone to see. ..."

The police never really looked mortified at doing it. I remember standing there and I was like, 'What the hell are you guys doing?' And they're like, 'Right, get your clothes off. We're gonna see your bollocks now.' What the hell do you mean by that? I thought they were joking because of the mannerisms and how they conducted it. It almost felt a bit of a joke to them. It didn't feel that serious. It was like, again, humiliating. [It] felt like they were humiliating me.

So that was incredibly traumatic and from that really was just a terrible start of a relationship with the police because instantly I hated them. They humiliated me."

A number of witnesses, including those from police forces, noted that this breakdown of trust can prevent children and their families from requesting or accepting support when it is offered:

"When a young person comes into custody, they are offered support but don't always accept it because the offer has come from the police. This can result in young people being released without receiving the support they may need to prevent them from reoffending and beginning the cycle again."

Superintendent Martin Earl, Merseyside Police

Homelessness or insecure accommodation

In England, a total of

112,500

young people sought assistance for homelessness from their local authority in the year to March 2022,⁶¹ with 138,930 children living in temporary accommodation in England at the end of June 2023.⁶²



In Scotland, over 8,000 homeless applications were made by young people aged 16-25 in the year to March 2023. The precarious situation of young people facing homelessness underscores their specific vulnerabilities, characterised by a lack of safe and stable living environments, absence of support networks, financial instability, and heightened risks of exploitation and abuse.⁶³

"To be honest, the system let me down. I couldn't even get a hostel. I could not get anything apart from – it was this situation where it was a floor space, but living with people that was really, really damaged and like smelling bad and injecting different drugs and stuff like this. It was very bad environment to live around and I thought, I can't live here, so I just went and lived on my own in my own tent."

Sy, young person with experience of exploitation

'They came along and they offered him the world'

Cristi and her son Sam

Sam was exploited from the age of 17 while living away from home. He has been diagnosed with ADHD and Autism Spectrum Disorder. As a younger teenager he experienced the death of a close relative to suicide.

Around this time he was exploited to sell drugs in the local area on behalf of others whom he saw as friends, and accrued debts that he struggled to manage as a result of his own drug use. Sam was referred to Action for Children after he was caught in the middle of a drug exchange with a significant amount of drugs and was charged by police.

Sam's mother, Cristi, described her difficulties in accessing help:

"He was a child going off the rails, nobody would listen... The only way I got a meeting with the teacher was to reference their own policies and procedures back to them. And she met me and I gave her evidence that my son was being bullied. And she says this is now a safeguarding issue. He's left school and I'm still waiting for them to respond.

I'd been to the police, I'd been through school, I'd tried to get him referred to CAMHS and nothing would work and we were on our own. He wouldn't come home, he would stay out for weeks on end. I'd phone the police and the police would call me a bad mum. And then he got arrested for doing something silly and my phone just blew up like a hotline.

Because he was becoming so violent at home I decided I had to put him out. It was the hardest thing I've ever had to do in my life. He wasn't getting benefits, he had no money. And then – I don't even like talking about them – I call them bad people. They came along and they offered him the world.

I didn't know what criminal exploitation was, but I didn't think it happened to children. I was naïve. I didn't realise there were people out there giving them money to go and do their dirty work. I was really fortunate that I had friends that knew the situation and I got referred to a good lawyer straight away.

Why aren't the police trying to help and support families that are going through stuff like this? They make it so the kids don't want to go to them, don't want to speak to them. So then the police are becoming the problem.

Action for Children have come in and supported me and given me my life back. They made me feel like I was a person and what I was doing was a good thing instead of always being bad, negative. ... And when my son became an adult and didn't come to Action for Children anymore, they still welcomed me with open arms. Since everything that's happened he's been diagnosed with ADHD, autism. He's got a job now.

It's been the worst experience of my life and when it happened I thought there was no coming back from it."

Poverty and cost-of-living crisis

Witnesses were clear that no strategy to reduce exploitation and violence would succeed without comprehensive systemic interventions to tackle poverty. Throughout the Review we heard how the cost-of-living crisis had exacerbated all forms of exploitation, youth violence and vulnerability, with one witness describing poverty “in itself acting as a grooming process”.⁶⁴

Poverty and social deprivation were described as the ‘backcloth’ to exploitation, with children living in ‘circumstances where the legitimate economy is not a way that they can see to earn the kind of status and living that they wish to earn’.⁶⁵

Polling shared by the Centre for Social Justice found that

25%

of teachers in schools in England with the most deprived student body had encountered suspected criminal exploitation compared with **12% of teachers at the most affluent schools**.⁶⁶



“If we were looking to seriously try to address violence, we should be calling for a national anti-poverty strategy, something that is focused on child deprivation, and how in places like London deprivation and poverty are so disproportionately distributed.”

Lib Peck

The UK government makes a related point in its Serious Organised and Crime Strategy that offenders are ‘exploiting increased levels of financial insecurity amongst victims to coerce them into drug distribution’.⁶⁷

“My parents split up when I was about two years old, both parents married new partners and they really struggled to care for us. Me and my sister started fending for ourselves so I started shoplifting at an early age. Shoplifting for food, I think I was about eight years old at the time.”

P, Action for Children mentor

Witness accounts further illustrated how poverty lowers the threshold for exploitation, as even minor financial debts can become entry points for exploitation. In one example, a child could not afford school lunch and was bought a Subway sandwich; this debt became the gateway to them being exploited.⁶⁸ We also heard from professionals and young people of children ‘looking to step up to support their family finances’.⁶⁹

“Some of the lads and lasses are from households where poverty is a massive thing. There’s either not much food or they don’t have the latest clothes, mum struggling or dad struggling. And I think sometimes the kids do what they do so they can say right, mum, here’s £20, don’t worry about buying new clothes.”

R, Action for Children mentor

Substance or alcohol misuse

Children with alcohol or substance misuse issues often have complex needs and are at increased risk of being criminally exploited.⁷⁰ Victims are sometimes given substances in lieu of payment, to maintain their dependency. We heard how quickly this could result in debt bondage, with children being provided with drugs on a ‘buy now pay later’ basis and then needing to repay the debt.⁷¹

Care experience

Understanding the prevalence of criminal exploitation among children in care presents significant challenges, as indicated by research from The Children’s Society in 2019, which revealed that only a third of local authorities in England recorded this information.⁷²

Ofsted found in 2022 that among

113

randomly selected children, criminal exploitation was the third most common reason that led to a child being placed into residential care.⁷³



Once in care, looked after children are additionally vulnerable to exploitation and going missing, and exploiters may target children’s homes specifically, resulting in some children being re-exploited while under local authority care.⁷⁴ Despite efforts by local authorities, there remains a significant gap in available accommodation and support for children with complex needs. In a small number of cases, placing a child away from home and exploitative networks for a limited period can be a last resort to keep a child safe. However, children living in semi-independent or independent accommodation, placed out-of-area or leaving care are particularly vulnerable, in part due to a lack of positive support networks.

“Even when local authorities can plan, there is often a lack of available accommodation and care for children with more complex needs. ... When children do not have their familiar networks of support and easy access to families, this can result in them being more vulnerable to exploiters. These problems are wider issues in the children’s social care system but have particular relevance for some of the most vulnerable children in our society.”

Ofsted

“At the age of 13 I was put into children’s homes. I was the youngest in the unit I went into. It was full of these guys that I’d only heard of in the school playground and they were up to all sorts of dodgy stuff... we just went absolutely mental stealing every day, breaking into places, just causing havoc in the unit. That slowly progressed to substance misuse. And then of course I was having to commit a lot of crime to feed this habit. I ended up getting sent to a YOI [Young Offenders Institution] at 17. Skip forward 17 years and I’ve been in and out of prison somewhere between 20 and 30 times.”

P, mentor

However, a significant number of children who are exploited have had no previous contact with social care. For example, of the 21 cases of criminal exploitation reviewed by the Child Safeguarding Practice Review Panel in 2020, only two were looked after children and the majority were not known to children’s social care.⁷⁵

Special Educational Needs and Disability (SEND) or learning difficulties

We heard that children with SEND are placed at increased risk if those needs are not recognised or supported. In particular, neurodiversity was cited in nearly all the examples we heard of exploited children, with undiagnosed or untreated ADHD noted as a significant risk factor by multiple witnesses.

Victims may be less able to recognise they are being exploited or less able to communicate it or access support, or have limited capacity when making sense of situations or making informed decisions. Children with ADHD are less able to assess risk or control impulsivity. These children are targeted by exploiters as they are perceived to be easier to control.

Racial bias

It remains unclear whether exploiters disproportionately target Black and minority ethnic children or if biases, adultification and systemic racism lead to their over-identification by authorities (this is covered in more detail in section 5.3). Despite an 81% decrease in the number of children entering the criminal justice system between 2011 and 2021, ethnic minority children are increasingly overrepresented. Black children made up 4% of children aged 10 to 17 in 2021, but 15% of child arrests, 18% of children stopped and searched and 29% of children in custody.⁷⁶

Children from Black and ethnic minority backgrounds are more likely to have multiple risk factors, including adverse childhood experiences, poverty, neglect, family substance misuse and exclusion from school.⁷⁷

Gender and child sexual exploitation

The overlap between criminal exploitation and sexual exploitation is complex. Victims of criminal exploitation are at risk of serious sexual violence and sexual exploitation, including rape, sexual violence and sharing of indecent images. Where girls are criminally exploited, this may be the primary form of exploitation or secondary to sexual exploitation. Girls may become criminally exploited through initially being groomed into relationships with gang members, and girls being criminally exploited are frequently subject to severe sexual threats and assault.



4.2 'If you go to the streets, they're going to come to you': The process of exploitation

Just as there is no one type of child who becomes exploited, there is no single path through which children fall victim to exploitation. Throughout the Review, we heard a multiplicity of ways in which children's vulnerabilities had been used by perpetrators to identify and groom them into criminality. However, once grooming has begun it follows a typical pattern. The process of exploitation unfolds through a series of incremental steps, marked by a mix of incentives, coercion and threats. The Children's Society explains the cycle of exploitation through stages of 'target', 'test', 'trap', which provides a useful approach to understand children's experiences.^{*80} Exploiters will look for a mix of vulnerability, skill, ability, cooperation to engage, willingness to take risks and maintain their involvement through incentives, threats and violence.

Target

Children are targeted by those who have understood and assessed their vulnerabilities and, often, have built up a relationship or trust with the child. We heard evidence that exploitation, including in the case of county lines, often begins within a child's existing peer network – those who are a little older in their school, wider friendship group or community.

"First of all, it was survival and – because obviously not knowing English, not knowing the system, not knowing anyone here, the first thing I thought was where can I make some money? Being on the streets, well, living on the streets, just I got to know some people. Then, from there, it went from like knowing the people to being asked to join and start doing it. I couldn't work. I couldn't do anything. I didn't have, well, a National Insurance number and papers and stuff like for being able to get a job."

Sy, young person with experience of exploitation

"This started at the age of 12 ... One of the guys who were living on the estate, he was slightly older, 15, 16, and he would make comments and things like, 'That piece of lead on that house there is worth £10.' I thought, well, it's only up one floor and it's on a small roof, I could easily just go up and pinch that kind of thing."

H, mentor with Action for Children

Test

Once targeted and groomed through incentives or relationships, a child's loyalty will be tested. This often comprises being given small tasks to do that seem easy and come with rewards attached – from money to protection – in addition to warnings against failure. The child is given a sense of belonging, of being inducted into the group:

"I think the first time I done it, I got given a phone and a bit of money, and I got told to take the bag somewhere and come back with a different one. So that was it really. Yes, I was definitely threatened. We weren't allowed to look in the bag and you weren't allowed to take it to the wrong place. You weren't, like lose it, if you lose it you've got to then go and do more favours and make money back like what they've lost because most time it was drugs or just money. Like criminal money. I've been all over the country."

Kyle, 15

Trap

The transition from being 'tested' to being trapped in criminal exploitation marks a critical juncture. Violence and humiliation become tools in maintaining control. Victims are often isolated from their families, with periods missing away from home and a belief that their families will be harmed if they reveal what is happening. Children can experience push and pull from their exploiters – being assaulted, abused and humiliated while simultaneously feeling protected and having a sense of loyalty to their exploiters.

"As a kid, you don't know that. You don't turn around and say to yourself, 'If I turn around and hold this for someone now, I could potentially get caught by the police. The police might raid my house. They might even take my family in for questioning.' You don't think about these things as a kid, but you think about them after, like when it's too late."

Michael, young person with experience of exploitation

**Adapted with permission*

Unaccompanied asylum seeking child and immigrants

Insecure immigration status, including unaccompanied asylum-seeking children (UASC) and refugees may have specific vulnerabilities that increase their exposure to exploitation. Children living in unsuitable contingency accommodation are particularly vulnerable to exploitation. Between July 2021 and October 2022, there were 391 episodes where children went missing from Home Office hotels.⁷⁸ Unaccompanied asylum-seeking children can also be vulnerable to debt bondage, including existing debt bondage from their journey.

The Independent Review of Children's Social Care notes that Home Office delays in processing asylum applications 'significantly disadvantage non-British children because of a loss of entitlements to housing, education, and employment for care leavers. This insecurity and imposed sanctions risk pushing children towards exploitation to survive'.⁷⁹

"They come into the UK and they disappear; because they never arrived at the school, they weren't recorded as missing persons for the given force area and nobody was looking for them. Where have they gone? What concerns should we have?"

DCS Kate Thacker

Financial control, often enforced through debt bondage, is a common tactic employed by exploiters, particularly in county lines operations. The exploiter may also deliberately manufacture a debt, for example by staging a mugging of drugs or cash in the victim's possession. The quote below, given by Mo, shows the speed with which children can become indebted to those who want to exploit them, including those who they view as friends:

“

One of the guys in the group, I remember that he said, 'Hold this package,' and I said, 'Okay, I'll hold it,' young me thinking I'm cool, almost, I don't know. Then I remember giving him back the package, and then he – I don't know how long after, within the same half an hour or whatever – he said, 'Give me that package.' I said, 'I passed it to you.' He said, 'No, you didn't.' I said, 'Yes, I did.' He said, 'Do you want me to beat you? Are you taking the mickey?' and I said, 'No, no, no, I gave it to you.' Then he turned on me and some of his friends turned on me. They were older than me as well, so they were like, 'What do you mean? What's he done with your...? He's taking the piss.' That type of gesturing, and again, little me not knowing what to do.

He said, 'Right, you owe me money,' and I'm like, oh shit, what am I going to do? ... [He] made me feel like I did; I lost it. I doubted myself because I was that naive. I'm going to get this guy back his money. How do I do this? I can't go to my parents. I can't go to my brother. I can't go to so and so."

Mo, former mentor with Action for Children

Incentives and gains

"I just really think the bottom line is that crime does pay, unfortunately, and these young kids if they're coming from nothing, the odds are against them."

H, Action for Children mentor

"When I turned 18, and before I came here, a few months before, I left with this group. They were promising me different things like, 'Oh, yes, you come abroad. You're working with us. We're going to give you €800 a month and a place to live.' It sounded really amazing, and so I left with them. I was living in this flat, and then I started working, picking potatoes, which is one of the most difficult jobs I ever, ever worked, and I've worked difficult jobs. ... It was all just promises. Then they took my IDs. They started taking loads of loans on my name because they made me a contract of work but I never got paid. They started to beat me up ... They told me that if I go to the police, this is going to happen and this is going to happen. They're going to kill me and they're going to go to my family ... They was like, 'You're not going to get your ID back unless you're going to do this for us and this for us,' so I ended up eating from the bins, living in a flat with them. I go to work. Work 12-hour shifts, Monday to Saturday. I had Sunday off."

Sy, young person with experience of exploitation

Witnesses described a number of incentives for children who are exploited, noting the important complexity of 'there being some form of offer or gain in the process of being harmed', which can make it 'very difficult for professionals at times to identify victimisation of children who seemingly were in some way benefitting from the harm they were experiencing.'⁸¹

Financial incentives

Though the levels of debt in which children become trapped are often very small to begin with, the potential financial gains are significant. H, a former victim of exploitation and now an Action for Children mentor, described how he was paid £1,000 as a 19-year-old simply to drive from Liverpool to Manchester with a package in the boot. Some victims described the appeal of new clothes, drugs and motorbikes.

'You never know what's coming'

Yasmin and her son Carl

Carl is 18 and has a diagnosed learning disability that makes it hard for him to navigate relationships and identify risk. This had led to him being wrongly accused of serious offences by people he saw as friends – Carl wouldn't say anything to the police as he didn't want to jeopardise the friendship.

Carl was identified as being criminally exploited after being found by police in 'trap houses' in different areas of England. He has received a 'conclusive grounds' decision by the Home Office, an official acknowledgement that he is a victim of modern slavery. His exploiters were arrested but no further action was taken as Carl would not disclose the information needed to progress with formal charges. The family has received threats on a regular basis and were moved to a safe location. His mum, Yasmin, spoke to the Review about the effect this has had on the family.

"He was going to school, had lots of hobbies, athletics. He had good friends. When Covid happened he had to stop everything and he didn't understand why. When I became concerned about it was obviously the first time he went missing. There were no signs, no nothing. That day he got dropped off I went shopping and his brother rang us and said he's packed a bag and left. That was the start of it.

It's been absolutely horrific, I now suffer with post traumatic stress disorder, nightmares. Sleeping with one eye open, not knowing who's going to come to the door. Not knowing if Carl is going to be in his bed, because a lot of the time I'd wake up and he's gone. The worry has planted very big seeds in my head that actually you don't trust anybody. Who's the next person who's going to pounce on my family? You never know what's coming. The constant threats: The house is going to get set on fire; he's gonna get petrol bombed. 'We're gonna hurt your mum, we're gonna hurt your brothers and sisters.' He can never switch off, he can never rest.

This was my life: I would get the kids to school, I would get someone to drive me around searching for him, and I would go home, try to eat, get the kids from school, drop them back at the house, go and look for him again, because he was missing the majority of the time. He wouldn't answer the phone. I had to say to the police and social services: 'You're going to have to find somewhere for him to stay because I really can't have him back home.'

Me and my family got moved out of our home by police and social services and we got put in a homeless shelter, a safe place. It wasn't a safe place, it was where a lot of these people who were trafficking Carl came from. The kids were very anxious. They don't like teenagers. If they see teenagers, they automatically think they're bad people and they're going to hurt my family.

You get these professionals that come into your life but then they kind of drop off and then it's a different worker. They start getting a bond with that kid, and then all of a sudden they've left and the kid's left thinking well everybody leaves us, everybody goes.

My youngest is at primary school. They're aware of absolutely everything, you can't help or stop things happening in front of them when these county lines have been going on, and Carl's behaviour in front of them. They've been through the mill. But they absolutely adore him and can't wait to see him again."

“It’s more like persuasion than blackmail like in the street. If you go to the streets, they’re going to come to you, they show you big money. Your first instinct is to go there. You’re going to go to the money.”

Tomas, young person with experience of exploitation

“I continued in that friendship group and the community got bigger, the underground community, if you like. So the connections were further spread and then there was a larger knowledge of streetwise behaviour that then led to ways to make money with even bigger profits, with less work. Obviously, I noticed that the risks were getting greater, but the profits were also getting greater. It was just, for me, it was worth the risk.”

H, Action for Children mentor

“I’m not going to get a job because by the luck I’m getting, it’s not giving me like any chance. ... so like I’ll just go sell drugs because it’s easy. Everyone’s doing it like on the street, on YouTube, everywhere. Every social media, you see people selling drugs. It’s like they just see it as easy money.”

Danny, young person with experience of exploitation

Respect and responsibility

We heard the sense of responsibility that children felt when part of a criminal gang; of having a job to do and doing it well. Others talked about having been ‘written off’ at school or because of who their older brothers were and, in contrast, feeling the respect of a position in a hierarchy. Involvement in drug dealing or other criminal activities provided a sense of purpose and validation, filling a void left by societal marginalisation or familial neglect. We heard that for some children they viewed themselves as taking on an adult set of responsibilities for their household – earning money and protecting their families.

“People describe being really good at it. Sometimes the first time they’ve been good at anything. Earning good money, getting promoted.”

H, Action for Children mentor

“It went to the case that I’m waking up every day and opening the fridge; there’s nothing in the fridge. I’m looking at the cupboards and seeing my mum’s overstressing. She’s going and taking cleaning jobs where my mum’s got to like, with her condition, bend over and clean someone’s toilet. That fact, I don’t know, just sparked like a manly feeling into me to get up and do something... I had the responsibility of providing and giving that care to my mother, so ... I was messing up my own education and everything for the cause of, well, for a good cause.”

Michael, young person with lived experience of exploitation

Community and protection

The desire for respect and belonging motivates many young individuals to seek solace and camaraderie within criminal gangs. Witness testimonies highlight how participation in illicit activities offers a sense of community and protection, particularly for those lacking familial support or positive role models. This sense of belonging often supersedes the risks associated with criminality.

“I enjoyed the community and having that brotherhood and that protection, that status, because I’m only a small kid and I was smaller back then. Obviously, without my dad, without any older brothers, it was, it made sense for me to attach myself to some people that were feared in the community.”

H, Action for Children mentor

For those who had made it out of exploitative situations, replicating this sense of community had been key. For some this came through joining a church or the structure of a drug or alcohol programme. For others it came from work and family.

“All I wanted was a little bit of love. I wanted to be accepted, wanted to be heard and wanted to be empowered. When you get cast out of school, when you have no voice in your home - that is so disempowering. Those guys who I met out there were vocal, they were empowered, and they walked like it and they spoke like it, and that was attractive to a young me. I could be that. I could do that. The prestige and the respect. I hadn’t yet experienced being respected, which is, I feel, a human innate thing to want to feel respected.”

Mo, former Action for Children mentor

Leaving exploitation

All witnesses described the process of moving away from exploitation as being hard and requiring tailored, consistent support at the right time. Akin to the pattern of domestic violence, threats to children can escalate at a point at which a young person is attempting to extricate themselves, leaving victims and their families in a perpetual state of fear and vulnerability.

We also heard examples in which a child had ceased contact or moved away to a place of safety, only to be found and re-exploited; this was the case with Ryan, whose mother Angela described how each time the family moved Ryan away for safety, “he was found and gravitated back towards the gang”. Other witnesses noted that criminals knew the location of residential placements where children would be taken for safety, with a foster carer reported as describing these placements as “like a supermarket for traffickers”.⁸² Another witness described how, “We have examples of car-loads of adults coming to residential placements to meet the child outside to take them away again.”⁸³

Witnesses told us about the ‘epiphany’ moments of realisation that they had been exploited – that they wanted to get out of their situation, and that they needed help to do so. For those who had made it out of exploitation, this point of crisis coincided with an offer (or knowledge) of help from a trusted service that offered a way out.

“It was a lonely road. I think I was thirsty for change in the end. I’d seen it. It was ugly. Once I’d realised this and these guys weren’t your friends, I realised I had to back away. What I’d also done in that time was I was able to humanise everybody. I was able to see everybody’s stories. Because I got so up close and personal with people in their lives, I was able to see why people were how they were. ... I needed a hell of a lot of support, and I’m still going through that, but what I wanted, I wanted to change as a person. I wasn’t happy with myself.”

Mo, former Action for Children mentor

For many, prison was the turning point – an enforced period of reflection and break from criminality. For others it came after being seriously assaulted or a friend’s death.

“I reached the point of breaking, to be honest. I tried to help myself. I did help myself. I ended up in a coma, and then, from there on, I thought, I need to do something. I need to change something.”

Sy, young person with experience of exploitation

Government funding has been allocated to address these critical ‘teachable moments’. Currently, Action for Children receives funding through the Violence Prevention Unit in Wales to provide support for children and young people who attend A&E due to injuries relating to serious violence or serious organised crime. The staff’s goal is to assist children during and after their admission to address vulnerabilities that could lead to future involvement in violence/criminal exploitation.

For the children and young people who were still partly caught between their old worlds, the future was less clear. The complexity of exploitation is compounded by the difficulty of some victims to identify themselves as having been exploited, often by those they had been in close friendships with.

“After I got jumped, I just, I wanted to stop it all... it was the people I grew up with from a baby and went to school with. Them people now, I would have known them for about 10, 11 years... It was just a bit of a shock... I thought they were my best friends.”

Kyle, 15

Victims often viewed their involvement in criminal activities as a means of survival, or friendship, rather than victimisation. Agencies’ responses to children who face charges can be influenced by whether these children are perceived as having willingly chosen to be involved in the situation. Witnesses noted the need for a sophisticated, nuanced approach to understanding the views of children who are victims of exploitation to make sure that they are able to reflect on their experiences in a trauma-informed way.

Kyle talked about his sense of responsibility to his younger brother, coupled with a feeling of needing to start afresh:

“I’m 15 years old, and usually, well, I’d usually be going out every day, selling drugs, carrying weapons and that, and but now I’m trying to stop it all really. ... I’m trying to get in the school. I’ve got that sorted almost. I haven’t had any weapons, I haven’t really got in trouble with the police or anything and I’ve been stopped arguing with my dad and that, like so I’m just trying to get a move on with my life really. ... Sometimes I’ve got to watch where I’m going, but most times I just stay in the house. I’m always angry so I’ve been doing MMA, Muay Thai to sort of keep myself busy. ... I’ve thought about running away a few times... down the country somewhere, maybe Scotland, somewhere more chill... But where am I going to get money from? What if I get lost? My little brother has been one of my biggest influences really, because I don’t want him growing up without a dad, without a brother. I could get murdered, I could get sent to jail.”

Kyle, 15

For the mentors who gave evidence, there was a clear belief that every child can find their way to a better life but that support to do so was essential. H, who now mentors children in the grip of exploitation, described how the offer of help can make all the difference:

“.....

Often, all they need is a bit of care. They haven’t had it their whole life. That can sometimes be enough for them to think, no, I actually think you’ve got my good interests at heart, and I do want to listen to you and I do want to get out of this life... It’s important that every young person has the opportunity to know what their gifts are and to use their gifts to go and do well in life.”

H, Action for Children mentor



4.3 ‘It’s the loneliest place in the world to be’: The impact on children and families

The harm that results from exploitation is acute, varied and long-lasting. It includes physical and sexual violence, criminalisation, drug addiction, homelessness, psychological trauma and long-term effects on children’s life chances.

Children who are forced to run drugs are at continuous risk of serious harm due to being the carriers of drugs and money. Children may be forced to conceal the drugs inside their bodies in a process known as ‘plugging’, which risks serious injury or death if the package were to rupture.

Physical and sexual violence

The business model of criminal exploitation is ‘inherently violent’⁸⁴ and victims of exploitation are at risk of multiple forms of violence. The level of violence described by children and parents in evidence was shocking. We heard examples of children being hit by cars, stabbed, burned with acid, sexually assaulted and beaten. Often their attackers were other children, sometimes those they had previously viewed as friends.

We heard how children may be taken to unhygienic and unsafe environments, such as ‘cuckooed’ properties, and exposed to drug paraphernalia and drug use. They may also experience hunger and sleep deprivation due to being forced to travel and commit criminal acts over long periods of time and overnight and are likely to witness or take part in traumatic events, such as drug overdoses, violence and sexual harm of others. Girls and young women are more likely to be – though are not the only – victims of sexual violence, and are at particular risk of being exploited via drugs to engage in sexual activity within criminal and non-criminal networks.⁸⁵

“One time, there was this kid came down with two of his friends, started on one of my pals, and my pal ran away and went and got all the boys, so there was a big group of them. Had hammers, machetes, axes, screwdrivers. Just anything you can turn into a weapon really. I got pressured into hitting this kid in the shop because I was like, I was standing outside a shop and then I got dragged into the shop, and they made us go, ‘Hit this kid’, he didn’t even do anything, he was just there. Obviously, he came from the wrong side really. So we all hit this kid, broke his nose, broke his arm. I think he had a fractured eye. It was bad because we all got in trouble for it as well. It got put on me, even though it wasn’t really my fault that I got forced into it. Stupid really, makes us ashamed. Wish I just stayed in the house or stayed in the school.”

Kyle, 15

H, Action for Children mentor

There were moments where I would be rushed by older males, and they'd say, 'Right, get rid of this, put this here', and I'd just be in the car with them. They'd drop me off at a certain location and say, 'Put this, and stash it.' Then it would be like, my phone would ring from one of his friends and I'd be confused, and they'd try and make me confused, then they'd say, 'This one has to go over here, stash it.'

I'd be stashing things in public spaces. I'd be going into a side lane and it would be a bush and I'd put it there, but then because I was so rushed and because they were messing with me, I was forgetting where it was. So then they'd say, 'Where is the package now?' and then they would have got somebody to take it. I'd be looking in the bush for hours and hours and hours because they said, 'You're in thousands of pounds' worth of debt now.'

Then it got to the point where I did have people after me, and they would turn up and they'd turn up in two cars, balaclava'd up, and chase me and then say, 'If you don't come into the car now, we're going to go to your mum's house.'

There was one thing I was at that moral ground of I don't want anything happening to my mum. She didn't raise me in this world, she doesn't know about this world. It would be completely unfair if they knocked on her house and did what they say they were going to do to her. So I agreed.

Somebody said, the guy said there was somebody in the back, who we paid money to stab you that night, but luckily you were fast and you got away.

**“.....
That was the story really, I was just somebody who was fast, who was trying to make a fast living, but actually damaging myself and my family and everything, my whole life.**



Multiple layers of trauma

“Actually, at the centre of all of this is a child who has suffered trauma. The issue with measuring trauma is it can be intangible... that's part of what we grapple with, in terms of measuring the impact of this work.”

Jo Procter

The underlying trauma that makes many children vulnerable to exploitation is compounded by the experience of exploitation itself. Experiencing and witnessing violence, threats, addiction and interactions with the police leads to the normalisation of feelings of anger, betrayal, fear, and isolation. All of the above, in addition to isolation from family, peers and social networks, can result in severe psychological trauma. Victims of exploitation may suffer from subsequent developmental, behavioural and overall health issues that can present as behavioural difficulties, aggression, attachment issues, distrust or mistrust of others, alcohol or substance issues. It impacts the way they see themselves and the world around them.

“Personally I just, I lost my friend. And I wasn't thinking straight and I done the wrong thing. I went over to college and somebody nearly got hurt and I was nearly going to prison for it... like very shocked, angry, sad, a few different reasons. Just like it's not been the same really. Ever since that happened, all the police, they're sending everyone to jail, just trying to crack down on us.”

Ben, 14

Witnesses expressed confusion and betrayal when exploited by individuals they considered friends. A common theme in these narratives is the expectation placed on children, even at a young age, to regulate their emotions without adequate support, and facing punishment when unable to do so. Many described turning to drugs and alcohol to cope. Witnesses noted there was not enough psychological support available for children in coming to terms with the trauma of exploitation, including understanding that they had been abused. One remarked that, 'In comparison to other forms of abuse, in particular sexual abuse, that understanding of trauma isn't really there.'⁸⁶

“I'm always angry. I reckon it was a, I found it a way to take my anger out, punching things, staying angry, so I found it as a way to take all my anger out really, but after I got jumped, I just, I wanted to stop it all... it was the people I grew up with from a baby and went to school with. Them people now, I would have known them for about 10, 11 years... It was just a bit of a shock... I thought they were my best friends ... Everyone was turning on each other really. Like one minute I was best friends with someone, and the next minute, I owed them money.”

Kyle, 15

4.4 'If they share things with me, I'm listening': The role of peer mentors in supporting children and families

The importance of peer mentoring in supporting exploited children is well-evidenced⁸⁷ and we heard testimonials from children, families and mentors themselves that highlighted the difference it makes in children's lives. Witnesses described the key qualities that made mentoring so valuable as being the consistency offered, the time taken to build up a trusted relationship with the child and their family, and truly understanding the child's perspective as a way to advocate on their behalf and help them, in turn, see the possibilities for the future.

Research conducted by Cardiff University on Action for Children's Serious Organised Crime Early Intervention Service (SOCEIS) highlighted the role of mentors in a child's life: "Peer mentors gave young people hope for their future and increased their self-efficacy and belief that they could change. This motivated them to set goals. Moreover, young people felt confident that SOCEIS practitioners and peer mentors would stay with them even when they made mistakes or when things went wrong. Hence, SOCEIS demonstrated an understanding that moving away from SOC takes time and young people may make mistakes as they embark upon their journey to change."⁸⁸

Consistency, trust and time

"The good people would come into his life and they would stay for however long and then walk away. But the bad people will come into his life and make him feel good and they stay."

Cristi, parent

Victims of exploitation, including their families, may have developed a deep mistrust of adults and authorities. Many witnesses noted the difficulty in services' ability to provide the level of sustained engagement with children that exploiters had. This was highlighted as a key advantage of mentors - the ability to step into the role of a trusted adult and work intensively with children on their own terms, being available to them when needed.

"You get these professionals that come into your life but then they kind of drop off and then it's a different worker... They start getting a bond with that kid, and then all of a sudden they're shipped somewhere else or they've left and the kid's left thinking well everybody leaves us, everybody goes... You have to be consistent. You have to stick around with a kid."

Natalie, parent

"Then what happens is they start feeling like when they speak, they know that things are actually going to be done. Whereas perhaps I feel a lot of the young people, they've spoken and they've opened up, but then it's just actually, nothing's actually manifested from it."

H, Action for Children mentor

Mentors noted that this put them in a privileged position of being able to identify small signs or changes in the behaviour of children that other professionals might not have the time – or understanding – to spot.

"As professionals we are able to identify certain signs. From my point of view I would say I'm kind of a step ahead compared to teachers in schools, they don't see the new clothes they've got, the new gear they have. We have the advantage where we see the young person in their rawest form... new clothing or a brand new friend who has just come out of nowhere... even a change of attitude. They might be a bit more macho because they've got more protection around them. And those are the kinds of things you look out for."

R, Action for Children mentor

The consistency and trust in this relationship was crucial, especially in situations where the amount of contact time was reduced. R noted the importance of being 'that backbone of support'. P reflected on his own mentor whom he had met in prison:

"He says, I know a different way for you to live and I can support you with that'... Slowly but surely he opened doors for me, got me into mentoring training... He was pushing me forward. It was uncomfortable at times... I started going into their jails and I'm working with these older guys... I started breaking down barriers, like I was seeing prison officers for the first time as my peers, I've seen judges and for the first time they're just human beings."

P, Action for Children mentor

The sense of credibility, stemming from shared experiences, distinguished mentors from other professionals who may belong to a statutory service that children have had poor past experiences with. H underscored the importance of taking the time to recognise the talents and needs of each child and see them as a fully-rounded young person:

"If they share things with me, I'm listening. I'm always listening, and I'm doing my best to do what's right for that individual, not perhaps what was right for the previous individual I met, but treating every single person as individual ... It's important that every young person has the opportunity to know what their gifts are and to use their gifts to go and do well in life."

H, Action for Children mentor

"It's insight. They can feel it. I suppose that made all the change, and that enables me to still now be able to like get a group of young people together because they know I care. They know it's real. I'm not doing it for the sake of a job, it's a real thing... Some people say they care, but they don't really care."

Mo, former Action for Children mentor

"All the organisations I've been to, like they say this. Just how do they know? Some of them, you don't even like get heard of. Like they don't let you know. You're just sitting there like, well, I just wasted my time just to speak to you about like my need. I want to do something and you're not even helping, and you're meant to be helping."

Danny, young person with experience of exploitation

Mentors and professionals noted that the mentoring role was not only beneficial to children but also to the mentors themselves as part of their ongoing journey from exploited children to trusted adults.

"I'm really grateful for that second chance. I believe that a lot of my work ethic is based on that second-chance mentality of actually being almost forgiven really, and saying, right, okay, you can move forward now and use your past experiences to go and make an impact in people who may share in similar stories to yourself."

H, Action for Children mentor

Understanding the young person's perspective

Understanding the young person's perspective is pivotal in effectively addressing the complex dynamics of exploitation. Mentors play a crucial role not only in supporting the victims but also in challenging systemic biases that often fail to recognise the diverse experiences of exploitation, helping other practitioners to see children through the lens of child protection and, often, the trauma that children had experienced. This included helping other professionals to understand the unintended consequences of intervention in order to address each child's barriers to accepting support. This ranged from the increased risks involved at the point of severing relationships with exploiters; to the practical barrier that moving a child out of a county lines group might result in a vulnerable family losing its main income stream; to the acknowledgement that a life outside peer networks and the structures of exploitation may be hard to navigate.

"It's very difficult to change that mindset to one where they go back to school and go into the classroom – where, very often, they don't succeed, they've been excluded from school and view themselves as failures – to try and persuade them that that's what they should be aiming to go back to."⁸⁹

Understanding one's own exploitation was understood by practitioners and mentors as a key step to being able to step away; for those children who were charged with offences it is essential in mounting a defence of exploitation.

“When you use the term criminal exploitation, they’ll fob it off as it’s not that, it’s someone being their friend or someone being their brother or sister. If it’s from someone within the family, they don’t tend to see the signs and it takes a lot of work and patience to try to drill them on some of the things that might be happening in and around them, for them to have that eureka moment... And even if they can come to grips with what we’re seeing and understand it, we’re still battling against the heart and mind.”

R, Action for Children mentor

Witnesses noted the need for a sophisticated, nuanced approach to understanding the views of children who are victims of exploitation to make sure that they are able to reflect on their experiences in a trauma-informed way. For mentors like R, the role includes both compassionate support and strong guidance to help children navigate complex emotions and, often, trauma.

Working alongside families

This need to build understanding of exploitation extended to parents, too, who may find themselves grappling with shock and a sense of unpreparedness when discovering their child’s exploitation in a situation they knew very little about and felt ill-equipped to handle alone:

“I just think that everybody needs educating on any sort of trafficking... picking up the signs. I didn’t know anything about it. ... I think there should be workshops and I think people should be going into schools all the time and doing talks. ... It could be anywhere or anything, youth clubs, anything there needs to be. So these kids are aware and the parents are aware.”

Natalie, parent

“Action for Children was like a turning point for the kids and me as a parent. I was able to see that there are reasons why this happens. I got loads of advice and support and was never ever judged, that was the main thing. So I felt safe coming here and speaking, and I was able to say things, able to say how I was feeling and speak to other parents as well, which was really, really important.”

Vicky, parent

In their suggestions of how to improve the system of support, those with lived experience of exploitation were clear that working with children and families from the earliest stage possible was essential.

“Having lived experienced mentors in schools, getting alongside these kids and showing them there’s a way. For me, growing up as a criminal I had so many barriers in place. It kept me where I was, it kept me committing crime. The onus is on the services to drop their barriers... having that compassion for young people and just letting your profession slip for a second and getting alongside them, loving them, showing them that you’re a human being. That’s vital.”

P, Action for Children mentor

Youth workers and mentors were cited often in the evidence as an essential part of the support structures for children in terms of ‘unlocking’ relationships with other professionals⁹⁰ through advocacy on behalf of children and bringing a legitimacy of experience:

“The role of a practitioner is just incredible because it has a large range of freedom. I do have the time and the intensity with the young person, so it looks completely different on each and every single young person. First and foremost is to get in the house or the place they live in. Meet the parents if they have parents. Meet the care workers if it’s a care worker. Make sure I can collaborate and work with them. Build trust, build communication, exchange details and, of course, then the young person has to be the target, the precious thing that we all have in common, that common denominator.”

H, Action for Children mentor

As echoed by individuals with lived experience, early intervention and whole-family support is essential in mitigating risks and fostering resilience among vulnerable children and families. In section 5 we look at the ways in which the local service responses and national structures help or hinder this approach.



5. What we learned: Core challenges of responding to the criminal exploitation of children

From professionals and practitioners, we heard about the dedication and devotion of those working to care for children in a system that is fragmented and frustrating at every turn.

Data and information sharing, funding and resources, and disconnected policies act as barriers to coordinated, targeted approaches.

Progress made across the UK at a local level – in schools, child protection, family support, criminal justice and policing – is too often unsupported by the legislative and policy framework that ought to underpin the whole. This includes a response at government level that is uncoordinated and lacks the urgency and political commitment required.

5.1. The need for a clear definition

We heard that the lack of statutory definition is increasingly problematic, with government departments, national and local agencies using a variety of overlapping ways in which to define the criminal exploitation of children. The National Referral Mechanism, the Home Office's Serious Violence Strategy, children's social care assessments and safeguarding practice guidance across the UK have in recent years all introduced child criminal exploitation as a category of harm in its own right.

The most commonly used in England and Wales is that given by the Home Office in its guidance on county lines, which defines child criminal exploitation as occurring:

... where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.⁹¹

This emphasis on the appearance of consent is described as 'long overdue'⁹² in the aftermath of several high-profile examples of UK child sexual exploitation, including the independent inquiry into child sexual exploitation in Rotherham, which have highlighted professionals' negative judgements regarding children's behaviour.

Witnesses discussed the numerous pockets of work ongoing to develop practical definitions of exploitation. There are several long-standing campaigns, involving charities and MPs, for UK governments to define in law the criminal exploitation of children to better guide practice. In September 2023 the Education Select Committee, as part of its ongoing inquiry into child exploitation and county lines, wrote to the Secretary of State emphasising the importance of a shared statutory definition and requesting information on whether the Department for Education knew of any plans to introduce one.⁹³

In Northern Ireland, a working definition is being developed that incorporates suggestions from children.⁹⁴

In January 2020, HMICFRS recommended that the Government should put the definition of child criminal exploitation in the Serious Violence Strategy on a statutory footing.⁹⁵

The Children's Society also suggests an alternative short form written by children, which describes criminal exploitation as 'when someone you trusted makes you commit crimes for their benefit'.⁹⁷

The definition suggested by children's charities, as an amendment to the Modern Slavery Act 2015, is slightly simpler than that above, being when:

Another person or persons manipulate, deceive, coerce or control the person to undertake activity which constitutes a criminal offence where the person is under the age of 18.⁹⁶

Why a definition matters

We heard from witnesses that the absence of a clear definition has a knock-on effect on both the ability to recognise the criminal exploitation of children and the ability to take appropriate action. It created a barrier to ensuring a consistent through-line from legislation and statutory guidance to the interactions of services with children at the points of highest need, as set out in 'Working Together to Safeguard Children'.⁹⁸

We heard that the absence of a clear definition in statute plays a role in failures to protect and support children, with responses to safeguard and protect being limited by the lack of a solid legal basis for services to intervene and a lack of understanding of the range of forms that exploitation can take.

"[Schools] see pupils for 25-26 hours a week... we would say that we are experts on that particular child, and yet our early concerns around exploitation are often not considered by other services. The definitions of exploitation might be different to the thresholds that warrant police intervention, and so a school may have a concern about a child but if it doesn't hit their threshold, or if it doesn't hit the definition of another agency, then often we're left to try and put an early help intervention in place without the statutory agency to support this."

Dr Jon Needham

Many witnesses agreed that exploitation is a distinctive form of child abuse, requiring a specific approach. A statutory definition was deemed essential in providing consistency of understanding across agencies to improve identification and response, and to ensure children are treated as victims.

A lack of legal definition can contribute to children receiving a criminal justice response rather than a safeguarding response. This is in large part due to children being first identified through their criminal activity, when early vulnerabilities may not have been identified. This can be a barrier to children disclosing abuse and exploitation.



In addition, the lack of a single, agreed definition of the criminal exploitation of children across all statutory agencies has created a postcode lottery, with access to support and services for the criminally exploited child being determined by the definition used in that particular locality. Multiple definitions operating across and within the police, social care, health and criminal justice sectors can result in agencies collecting different information in different ways, making a clear picture of the extent and scale of exploitation impossible to accurately calculate.

Further challenges for multi-agency partners relate to criminal exploitation often being conflated with county lines or serious violence and, as a result, not being connected to other areas of work including family help, SEND policy and care leaving services. This can impede holistic support for a child and their family.⁹⁹

Relationship to modern slavery

Criminal exploitation is currently located in legal terms under the Modern Slavery Act 2015 in England and Wales, and its trafficking counterparts in Scotland¹⁰⁰ and Northern Ireland.¹⁰¹ There was agreement among witnesses that the current legal situation is unsatisfactory (as covered further in 5.2), that there was not sufficient understanding among professionals that the criminal exploitation of children was a form of modern slavery, and that there may be situations of exploitation that do not meet the criteria for modern slavery or human trafficking under international or domestic law and policy.¹⁰²

However, there was some disagreement as to whether this required (a) the Modern Slavery Act to be amended to more firmly encompass the criminal exploitation of children, or (b) the criminal exploitation of children to be removed from its legal tie to modern slavery and given its own place. The Modern Slavery Act defines exploitation by reference to a person being subjected to force, threats or deception.¹⁰³ We heard that the specificity of this 'doesn't reflect what will happen in cases of child criminal exploitation if we want to intervene earlier rather than wait for an explicit threat, at which point children will be in dangerous situations'.¹⁰⁴

An alternative view was that the criminal exploitation of children is a form of modern slavery 'and it would be unhelpful to completely separate it in law and policy'.¹⁰⁵ The Centre for Social Justice noted that:

*"We have some concerns that a statutory definition of 'child criminal exploitation' alone may risk entrenching patterns that younger children are more readily identified as victims of exploitation and that once someone turns 18 they are not seen as a victim of exploitation and are held fully criminally responsible. Section 3 of the Modern Slavery Act 2015 provides a definition of 'exploitation' for the purpose of the human trafficking offence in section 2. However, it does not give a definition of criminal exploitation. Criminal exploitation is covered by the parts of the definition relating to securing services or benefits by force, threats or deception or from children and vulnerable adults by exploiting their specific vulnerability."*¹⁰⁶

The purpose of any new definition

“Poly-criminality and victimisation has been recognised in almost every child protection investigation that we’ve supported. You don’t always have organised crime groups or organised groups of offenders. It doesn’t necessarily have to be sophisticated. You never have them sat at home, saying, ‘Well, I’m only operating within a county lines model, I won’t exploit anyone in any other way.’ Of course not.”

DCS Kate Thacker

We agreed with the views of several witnesses that any new definition ought to be useful, tangible and enable a local and national picture of exploitation to be developed. It should help practitioners, services and systems to understand the features of exploitation by providing a wide lens through which to see children’s trauma, experience and behaviour. Witnesses emphasised that it should not act as a barrier or gatekeeper to children being seen as exploited; therefore, the simpler the better.

“The definition needs to be quite broad. It cannot be aligned with one particular model of criminal exploitation. Children define child criminal exploitation as ‘someone you trusted makes you commit crime for their benefit’. We believe that that’s what the statutory definition of child criminal exploitation should be. Child criminal exploitation is when someone encourages or expects a child to take part in activity that constitutes a crime under the British law.”

Iryna Pona

We were also sympathetic to the caution expressed about becoming ‘so preoccupied with definitions that energy is diverted away from responding’¹⁰⁷ and to remember what the definition needs to achieve – understanding, identification and consistency of response:

“Definitions are something that people spend years and years and years debating and never quite get anywhere. ... Maybe we start at the place where we get consistency, then we work up to the point where we can’t get consistency anymore. ... In terms of then specifying does it involve sexual abuse, does it involve kids, does it involve adults, involve organised crime groups? I think it’s really difficult to hive off an entire harm type in that way. They bleed into each other so much and we get so lost in the what is it. By the time we’ve all agreed on something it’s moved on. It’s changed.”

Professor Carlene Firmin

Finally, witnesses recommended that a child-friendly version of the definition be included and emphasised the importance of children and families being involved in developing accompanying guidance.

Our proposed definition is included in the Recommendations section of this report.



5.2. Existing legislation, policy and criminal proceedings

Witnesses provided a large amount of evidence that the current framework of legislation and policy across the UK does not always work well, and that there was ‘a clear gap’ between legal provisions and the problem we are trying to tackle.¹⁰⁸ In particular, we heard about the challenges caused by a lack of a legal framework intended to deal with criminal exploitation.

Relevant legislation

Without a single definition, criminal exploitation falls under the legislative framework of trafficking and modern slavery; Home Office guidance on county lines (2023) explicitly describes criminal exploitation as ‘a form of modern slavery’. The relevant pieces of UK legislation are:

- Modern Slavery Act 2015 covering England and Wales.
- Human Trafficking and Exploitation (Scotland) Act 2015.
- Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.

Exploitation, within this legislation, refers to four offences: slavery, servitude and forced or compulsory labour; sexual exploitation; removal of organs; and securing services by force, threats or deception. ‘Securing services etc. from children’ is also categorised in the Modern Slavery Act 2015 as exploitation where the child has been specifically chosen for criminal purposes ‘on the grounds that he or she is a child’.¹⁰⁹

In England, Wales and Northern Ireland this legislation provides a statutory defence available to children (aged under 18) who have committed a criminal offence due to being a victim of modern slavery or exploitation. This is known as the Section 45 defence in England and Wales and the Section 22 defence in Northern Ireland (relating to the relevant sections of the Acts above).¹¹⁰ In Scotland, the Lord Advocate has issued instructions that if the child was aged 17 or under at the time of the offence ‘there is a strong presumption against prosecution of that child for that offence’.¹¹¹ However, there are no statistics available on how often the statutory defence is applied in case of children.

Evidence provided by the Crown Office and Procurator Fiscal Service (COPFS) in Scotland highlighted in the year 2022/23, COPFS received 98 police reports containing charges against 146 accused persons (130 adults and 16 children) reported to the National Lead Prosecutor. To date, 25 of those accused persons have had proceedings against them not raised or discontinued on the basis that the test in the Lord Advocate's Instructions was satisfied.¹¹²

England and Wales

The primary issue we heard about regarding legislation in England and Wales was the lack of explicit legislation to deal with criminal exploitation. The key piece of legislation in England and Wales, the Modern Slavery Act, does not use the term criminal exploitation. Several witnesses highlighted that this issue was well known and that there were calls to amend the Act to add a definition and change its title to the Modern Slavery and Exploitation Act.

Witnesses suggested that even where the legislation might be applicable it was poorly understood and so not used. For instance, we heard that exploitation is not always considered by courts and that the Section 45 defence is not consistently applied. The second limb of the Section 45 defence requires that the child on trial (the 'person') must establish that, 'a reasonable person in the same situation as the person and having the person's relevant characteristics would do that act'¹¹³, a requirement that witnesses believed sets too high a bar, particularly in the case of jury trials, and can lead to children being re-traumatised if their story is not believed.

In England, Working Together to Safeguard Children provides additional guidance, including to police forces, that children 'who are encountered as offenders, or alleged offenders, are entitled to the same safeguards and protection as any other child and due regard should be given to their safety and welfare at all times'.¹¹⁴

In Wales, the All Wales Safeguarding Practice Guide for Child Criminal Exploitation explicitly states that the criminal exploitation of children is a form of child abuse that warrants a safeguarding response.¹¹⁵ In both cases, witnesses did not feel that either the strength or application of that guidance is an adequate tool to ensure that instances of exploitation are dealt with appropriately.

More generally, witnesses highlighted legislation that means that all professionals have a duty to report concerns about a young person's safety or wellbeing under the Social Services Well-being (Wales) Act 2014.

"From my experience on the frontline, I think one of the problems is there's no legislation that has been drawn up to cater for these children and young people. The Children Act legislation from 1989 was drawn up largely around the family being the problem... It was never intended, I think, to reflect a situation where, in fact, the problem is the community rather than the family. ... At the moment, it seems to me that none of the legislative planks in place actually meet the scenario that we're dealing with day in, day out."

His Honour Judge Steven Parker

Scotland

The legislative framework in Scotland is different from elsewhere in the UK. Witnesses who spoke about the response to criminal exploitation of children in Scotland were generally more positive about the law on exploitation. A number of elements of that framework were raised by witnesses:

- The Human Trafficking and Exploitation (Scotland) Act 2015 requires the Lord Advocate to issue instructions for prosecutors regarding the prosecution of victims of human trafficking. Those instructions include a presumption against the prosecution of child victims of trafficking who have committed a criminal offence in the course of or as a consequence of being trafficked.
- Local authorities and partners in Scotland are asked to adhere to the definitions in the National Guidance for Child Protection in Scotland (Scottish Government, 2023).
- The Getting it Right for Every Child (GIRFEC) approach provides Scotland with a consistent framework and shared language for promoting, supporting, and safeguarding the wellbeing of children and young people.
- Although the updated National Child Protection Guidance for Scotland acknowledges criminal exploitation, it does not receive the same level of attention as child sexual exploitation, which has a significantly more extensive section in the guidance.

A number of witnesses highlighted the benefit of the Children's Hearings System (CHS) to which all children under age 16 and some 16- and 17-year-olds can be referred. The forthcoming Children (Care and Justice) Bill proposes a number of changes to that system, including raising the maximum age of referral to the Children's Reporter to cover all those aged under 18 and stopping the use of young offenders institutions or prisons for children under 18.

Scotland's 'Rights-Respecting Approach to Justice for Children and Young People' takes a deliberately different approach and has a particular focus on children's rights, stating that:

'For those who come into conflict with the law, their rights must be upheld, their life chances improved, and services and systems must support them effectively to address their needs and the circumstances which have led to their behaviour, to achieve positive outcomes. Children are diverted away from the Criminal Justice System, wherever possible and appropriate, to avoid the criminalisation of their behaviour, but receive effective support to attend to any needs underlying the harmful conduct. For the small minority who will go through the Criminal Justice System then they are meaningfully supported to participate and understand the system and processes.'¹¹⁶

Northern Ireland

Northern Ireland, like Scotland, has its own legislative framework that is built around the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. The Act itself is part of the 2015 Fresh Start Agreement.¹¹⁷

Witnesses were positive about the range of activity currently being attempted, in particular the Tackling Paramilitarism, Criminality and Organised Crime Programme which is active across Northern Ireland and supports people and communities who are vulnerable to paramilitary influence and harm, with commitments being delivered collaboratively by government departments, statutory agencies and partners in the voluntary and community sector.

We heard that elements of guidance in Northern Ireland explicitly respond to the unique context of exploitation, namely that "Children may also be abused or exploited by adults who hold power within their communities..."¹¹⁸ However, witnesses also stressed the limits of that approach highlighting that it is not mirrored in general safeguarding guidance, 'Co-operating to Safeguard Children and Young People', or in guidance on trafficking and modern slavery.¹¹⁹

There was general frustration about the pace of progress, with the Northern Ireland Commissioner for Children and Young People stating that it was 'unacceptable that over two years after the advice was issued an action plan has been issued and there has been no substantive progress'¹²⁰.

National Referral Mechanism

The National Referral Mechanism (NRM) is the framework for identifying and referring potential victims of modern slavery. Witnesses told us it was not designed for cases of child exploitation and was not fit for purpose in offering protection to children who have been exploited. The NRM process will provide a decision by a Single Competent Authority – the decision-making authority in the Home Office – on the balance of probabilities, advising whether an individual has been a victim of trafficking or modern slavery. We heard that the process for referral and decision-making is slow and lacks transparency or scrutiny, with key data about children referred into the NRM unavailable and/or unrecorded.

The NRM process does not support children's ability to make a defence of exploitation in criminal proceedings and may hinder those proceedings due to mismatched timescales and the lack of qualification of the Single Competent Authority as an expert in exploitation.

The range of first responders who can submit referrals to the NRM is narrow, excluding agencies and legal teams who work directly with exploited victims; one witness remarked that they had been in situations where they were unable to find a first responder to refer a child into the NRM because the child was not known to any services.¹²¹

Children are required to give a statement about their exploitation but if this does not happen at an early stage, they are unlikely to be given a 'conclusive grounds' decision – the official decision that they are a victim of modern slavery or human trafficking. This is extremely difficult for children who may be traumatised by their experience of being exploited. They may be frightened about the repercussions of giving details of what happened to them, or unwilling to accept that they have been the victim of exploitation.

We also heard that the NRM system is overwhelmed with cases. The time taken for conclusive grounds decisions to be reached has increased more than fourfold in the last 10 years, from an average of 105 days in 2014 to 526 days in 2023.¹²² This follows a tightening of criteria in January and June 2023, which witnesses said they were expecting to reduce the number of positive decisions. The NRM has two stages: a 'reasonable grounds decision', meaning that there are reasonable grounds to think the person is a victim, and a 'conclusive grounds decision' that looks objectively at whether they are a victim.

Following the Nationality and Borders Act 2022, the Home Office guidance on the threshold for 'reasonable grounds' changed from one of a balance of probabilities – that a child 'may be' a victim of modern slavery or human trafficking – to a decision that the child 'is' a victim. This stage now requires 'objective' information or evidence in addition to a child's account. The 2022 Act means decision makers can now disqualify children from the right to an NRM assessment on the grounds that they are a 'threat to public order'. Witnesses stated that they believed these changes have increased the likelihood that children will be refused at the first stage of the process. One remarked that the provisions 'are really not compliant with children's rights and will lead to the increased harm and criminalisation of children who are being criminally exploited'.¹²³

This has an adverse effect on a large number of children in the criminal justice system. We heard that delays with the NRM process in turn delay criminal cases, keeping children on bail or in remand longer. The delays in NRM decisions can prevent criminal lawyers running Modern Slavery defences or presenting evidence to the court or the jury.¹²⁴

As the system currently stands, the NRM is vitally important in securing support for young people who have been exploited, particularly for those who have been arrested. ECPAT UK, a leading children's rights organisation working to protect children from trafficking and exploitation, noted that a negative decision from the NRM 'can be catastrophic for children... A negative decision does have a great implication for children who are criminally exploited when they're facing prosecution for offences they've committed as a result of their exploitation'. Though the decision isn't binding on the Crown Prosecution Service (CPS), it 'may go a long way to swaying the prosecutor on whether or not they accept the child is a victim'.¹²⁵

Witnesses described the 'conflicts' inherent in the system, whereby a large number of children are referred to the NRM by police forces at the point of arrest. This means that the police believe that there is a high likelihood that a child is the victim of exploitation, even as the child is moving through the criminal justice system. Local authorities are not always notified, or do not have full access to the details of children in their area who are referred to the NRM by other first responders.

Full data is not available on the children who are referred to the NRM or subsequent decisions, including the demographic breakdown of children referred (including ethnicity and exact age), the care status of the child, and the source of referrals from within local authorities. In addition, children who have an NRM submitted but turn 18 before a conclusive grounds decision has been made are required to resubmit the referral to confirm consent. Exploitation within paramilitary groups is yet to be recognised as a modern slavery issue in Northern Ireland, with the result that Northern Irish children exploited through county lines drug networks do not benefit from the protection of the NRM.¹²⁶

Witnesses emphasised that there is currently no process for halting criminal proceedings against children charged with drug-related offences until an NRM referral is made and a decision reached. The NRM decision has no official status in a criminal court, which makes decisions based on the criminal standard of proof 'beyond reasonable doubt'. In practice, it means that many children who are victims of trafficking and exploitation endure criminal proceedings, alongside processes to recognise them as victims. They may be convicted of drug-related offences despite later being found to be a victim of trafficking through NRM.¹²⁷

Witnesses noted that the locally-devolved NRM pilots are a welcome development and, if the evaluation evidence is positive, this approach should be rolled out to all local authorities in the UK.¹²⁸ Twenty sites in England and Wales are using the pilot to test whether determining if a child is a victim of modern slavery within existing safeguarding structures is a more appropriate model. The assumption is that if decisions about a child are made by those involved in their care then they will be more closely aligned with the provision of local support and law enforcement, and mean a better response for each child.¹²⁹ The Centre for Social Justice noted it had been told by those within local authority areas where these pilots were taking place that they have shown great benefits of particular relevance for victims of criminal exploitation.¹³⁰



Disrupting and prosecuting perpetrators

We heard that the current approach and legislation is too lenient on exploiters while placing restrictions on children. In 2022 HMICFRS stated that ‘we believe that modern slavery offences should be pursued whenever possible in county lines cases’ but this does not yet seem to be the case.¹³¹

Prosecutions under the Modern Slavery Act are very low, with an annual decline in prosecutions and convictions over the past five years. Crown Prosecution Service (CPS) data shows there were 36 prosecutions and 20 convictions in 2017/2018, decreasing to just two prosecutions and one conviction in 2020/2021. This is in contrast to the 10,209 people who were arrested in relation to county lines activity between 2019 and 2023.¹³² Given the rapid rise in identification of children at risk of exploitation, this suggests that awareness of exploitation in children’s safeguarding is not translating into action in the criminal justice system. In addition, witnesses noted a pattern of trafficking legislation being used to prosecute exploited young people if they had also exploited others.

Family Courts (in England, Wales and Northern Ireland) and Children’s Hearings (in Scotland) are limited in the legal orders they can apply to protect a child who is at risk of or experiencing exploitation. While Compulsory Supervision Orders in Scotland can have many conditions applied to them – which limit who children can come into contact with – they do not in themselves have any sanctions attached to them if a child does come into contact with that person. If the conditions of an order were routinely being breached then the Hearing has the option to review the order and how it is working.¹³³ Child Abduction Warning Notices are the only type of notice that police in England can use quickly without applying to courts; they are used in cases of children going missing, where there are concerns that individuals may be encouraging children to go missing or harbouring them.

The notice lets the perpetrator know that agencies know they do not have good intentions in relation to the child and may be targeting a child for exploitation, sexual or criminal. It prevents the perpetrator from later claiming that they did not know the age of a child or that their actions were not allowed. For these, too, there is no automatic sanction for a breach. They also cannot be used in relation to children aged 16–17 who aren’t on full care orders, an age group over-represented in numbers of children who are exploited.¹³⁴

Threat to Life notices are also used to warn of a death threat, risk of immediate danger/murder and can be issued by police. Seen as a preventive measure, they are used when there is intelligence of a threat to an individual but not enough evidence at that stage to arrest and/or charge the potential murderer. Notices can be issued to both the victim and perpetrator, with the understanding that specific threats to kill are classified as offences and will result in arrest.¹³⁵

In Scotland, Trafficking and Exploitation Prevention Orders (TEPOs) impose restrictions on people who have been convicted of trafficking and exploitation offences, while Trafficking and Exploitation Restriction Orders (TEROs) ban suspects from a range of activity with potential restrictions on movement within the UK or on internet use. The number of these orders imposed due to the criminal exploitation of children is not centrally collated. In addition, as ‘criminal exploitation’ is not recognised as an offence in itself under the Human Trafficking and Exploitation (Scotland) Act 2015 there is no way to tell how many of the 195 prosecutions that have occurred up to March 2023 involved child criminal exploitation.¹³⁶

Witnesses emphasised that the focus of legal orders should be to target exploiters in the first instance; children should not have their liberty restricted due to a risk of harm from others, and that ‘sometimes we end up depriving children of their liberty to protect them from others’, an act that is ‘not in accordance with UNCRC at its most basic level.’¹³⁷ Professor Carlene Firmin noted that ‘Often in our pursuit of disruption, we create environments that are just hostile to children.’

As a dissenting view, some witnesses argued that the legislation is correct but that the system does not use it correctly, including a lack of awareness on the part of social workers, police and the prosecuting authorities.

5.3. Tensions between criminal justice and child protection

One issue highlighted by witnesses throughout our evidence hearings was the interplay between safeguarding and criminal justice systems when responding to the criminal exploitation of children.

“.....
What we have learnt in terms of some of the challenges – and this is a complex ethical dilemma – is that we’re dealing with young people who are often involved in two systems, law enforcement and safeguarding, and the overarching question to that is, do those systems align to better support young people?”

Sharon Maciver

The most common view we heard was that safeguarding responses were too often secondary to criminal justice responses. For example, we were pointed to research and recent Serious Case Reviews and Safeguarding Panel Reviews in England that highlighted a significant tension where professionals responsible for child welfare and protection have given way to policing and criminal justice responses as the dominant legal framework.¹³⁸

Witnesses felt that prioritising safeguarding would enable agencies and services to respond to the risk and harm of exploitation, before they come into contact with the criminal justice system. It was reiterated that, though the primacy of safeguarding and children’s welfare was written clearly in key national and local policy and guidance, including policing guidelines, the reality of responses was often far removed from this aim. Witnesses noted that systems continue to respond to indicators of exploitation without recognising it as exploitation, only considering it when it became harmful to others or the child came in contact with the law, suggesting a lack of confidence in identifying exploitation without criminal data.¹³⁹

“I think, despite our 50-year history of focusing on needs not deeds in Scotland, there is still a fairly superficial frame we can, from time to time, put around a child’s behaviour as being something we want to transact punitively through the criminal code and not the welfare provisions we have.”

Neil Hunter

Inconsistencies across the UK

We heard that the legal framework across the four nations was inconsistent. In particular, witnesses felt that while the principle of the primacy of children’s welfare was firmly stated in statutory guidance – as detailed below – this was not supported by key legislation and criminal justice processes that placed the burden of proof on children to demonstrate they have been the victim of exploitation.

– Working Together to Safeguard Children, the guidance for statutory safeguarding partnerships in England, states that children who are encountered as offenders are entitled to the same safeguards and protection as any other child.¹⁴⁰ The language in equivalent guidance in Wales (Working Together to Safeguard People), Scotland (Getting it Right for Every Child) and Northern Ireland (Cooperating to Safeguard Children and Young People in Northern Ireland) is very similar. The safeguarding frameworks across all four nations are clear that every effort should be made to avoid the unnecessary criminalisation of children.

– Updated Home Office guidance on child exploitation states that ‘any child, young person or vulnerable adult who you think may be at risk of county lines exploitation requires a safeguarding response’.¹⁴¹

– The Serious Violence Duty (2022) states that ‘There needs to be a proportionate response in the strategy so that those children and young people impacted by criminal exploitation and engaging in serious violence are seen as victims and are safeguarded and supported as opposed to criminalised’.¹⁴²

Witnesses were clear that the tensions between the child protection and criminal justice systems were not simple.

Just under

53,000



children were arrested in England and Wales in 2021/22, and witnesses highlighted that, in many instances, those children have also exploited or harmed others, meaning agencies had to answer the question of how to balance victims’ rights to justice with the aim of safeguarding and supporting exploited children.

Even where witnesses highlighted that safeguarding should be given greater weight, they often raised the challenges of making that a reality within the context of balancing two systems working to different underpinning principles and outcomes:

“I think there should be greater teeth in safeguarding over justice processes. I don’t think it’s possible to overemphasise how difficult it is to develop a holistic safeguarding response to adolescence, or at least to extra familial forms of harm, where for some harm types you’re much more able to put safeguarding over and above criminal justice proceedings, and for other harm types you can’t. ... Whether a child is abused in their family or they’re abused in an extra-familial context, they must always receive a welfare-based response and, where appropriate, there will be a criminal justice intervention. Not: “if you’re abused in this context, you get a welfare response. You’re abused in that context, you get a criminal justice response”. That is not maintaining the core rights of children to protection, to family life.”

Professor Carlene Firmin

Witnesses outlined a range of inconsistencies in the approach to exploited children across systems and agencies, including whether the risks to children were primarily from within or outside the family home. Similarly, we heard that the way in which processes and procedures are implemented is inconsistent both across the UK and within the four nations:

“That is not consistent across [Scotland]. It’s very, very patchy. You have some areas where they are trying to develop the processes and really use what’s there, but it’s a hit and a miss, to be perfectly honest, as to how effective that is.”

Donna McEwan

We heard that these difficulties had been made more challenging by a range of factors including resource constraints, but that there were fundamental issues that had always required careful balancing of risks and needs.

“Although the first line of ‘Working Together’ states that ‘Nothing is more important than children’s welfare’, this belies a very complex landscape. Different partners – not least because they are governed by different Government departments – have competing priorities. This, combined with resource constraints, can mean that children’s welfare is not always treated as the top priority. Children’s welfare often does not take precedence – for a multitude of reasons that are nothing to do with professionals not caring. For example, when children hurt or kill other children, whose welfare is paramount? When there is a documented paucity of safe settings for children, how can local authorities prioritise their welfare in placement decisions? If a 17-year-old exploits an 18-year-old, whose welfare takes precedence? Whilst few if any would argue that children’s welfare is key, it is extremely difficult to enact this principle at a local level in every instance of CCE.”

Research in Practice

These tensions were recognised by witnesses from both the child protection perspective and those from the police and criminal justice. Ian Critchley, a member of the Child Safeguarding Practice Review Panel who was formerly Deputy Chief Constable of Merseyside Police, described the lack of options available to protect children before serious harm occurs:

“There’s almost an exasperation, certainly from colleagues, in terms of, well, what can we do? The child remains in the family home. The child remains in the seat of where the violence is taking place, and will either inflict serious violence on somebody or have serious violence, if not worse, inflicted on them... what is the action, what is the response? I think that’s where we struggle.”

Ian Critchley

We heard a range of views on how to resolve these tensions, both ethically and practically in terms of process and legislation. This was seen as particularly difficult where crimes committed through exploitation involved serious harm to others, especially where exploited children had gone on to exploit others, either when still a child or as a young adult.

“There is still some thinking that children in these circumstances have got a choice – they don’t. It’s the context that they’re living in; they are so desperate.”

Jess Edwards

“Nationally, there is evidence that we have children and young people who have been exploited but have then progressed through their criminal career and gone on to exploit others. So it’s trying to develop that tradecraft, the expertise and knowledge which allows identification of those vulnerable and exploited children and young people with our front-line staff and partners.”

DS Andrew Farrell

The criminalisation of children

In the year ending March 2023, there were just over

11,900

occasions in which children were sentenced in court, with around 5,000 youth cautions given to children.¹⁴³



This was a 6% increase in the 10-14 age group on the previous year. There was an average of around 440 children in custody at any one time during the year, with 44% of those children on remand. Almost two thirds of children remanded to youth detention did not subsequently receive a custodial sentence.

There is no data on how many children are criminalised for offences committed as a result of their exploitation in the UK. Given the disproportionate representation of child criminal exploitation within NRM referrals, we remain concerned that children continue to be criminalised and even when identified, they are not provided with effective safeguarding responses to protect them from further exploitation.

Many of those children are very young. Witnesses highlighted that in recent years, drug and weapons offences – issues often associated with exploitation through county lines – have seen the biggest increase in data on first-time entrants to the youth justice system. Many first-time entrants into the justice system are aged between 10 and 14.

One area that witnesses consistently raised was that children were criminalised because exploitation was not considered early or often enough by responding services.

A call for evidence by the Independent Anti-Slavery Commissioner’s office in 2020 found that:

“Police are not consistently considering from the outset of an investigation whether the suspect could be a victim of trafficking and whether the statutory defence may apply.”¹⁴⁴

In February 2024, the Metropolitan Police was found by an inspection by HMICFRS to be ineffective in its handling of criminal exploitation of children, with half of the investigations it examined graded as inadequate and 55 instances of ‘victim-blaming language’ used by officers and staff; a worrying finding for a force handling the largest number of county lines and serious youth violence cases in the UK. The inspection found that there was ‘insufficient focus on child exploitation at a senior level’ within the force with ‘limited examples of a child-centred approach’. The report noted that the Metropolitan Police’s London Child Exploitation Operating Protocol begins with the statement ‘Children that come to notice must be treated as children, whatever the circumstances they find themselves in’, but that ‘Unfortunately, we didn’t see this reflected in the force’s practice’.¹⁴⁵

Deprivation of Liberty Orders

'In order to protect them, we lock them up, we move them away from their families, their friends.'

Professor Carlene Firmin

Witnesses discussed the role of family courts and the use of Deprivation of Liberty Orders (DoLs) and Children's Hearings in Compulsory Supervision Orders with authorisation to place a child in secure care when responding to the criminal exploitation of children. When children involved in county lines come to family court in England and Wales it is because the risk has escalated beyond what is manageable by the local authority, and an application is made for a secure accommodation order, a deprivation of liberty or an interim or final care order:

"I'm meeting the children and young people when things have gone badly wrong and the local authority are really worried about risk; and, of course, as we know, 'risk' means risk of death or catastrophic harm. ... Very often, they've actually been arrested by the police in possession of illicit street drugs, usually cocaine, and sums of money, or they've been involved in a serious act of violence. The situation is now critical because not only do you have a child who's exposed to the risk of death and catastrophic harm, but now to the criminal justice system as well, so there's a double jeopardy for them."

His Honour Judge Steven Parker

There is no automatic consideration by the courts when an application for DoL is made as to whether a serious incident notification has been submitted to the Department for Education, and no requirement that local authorities inform the court of this.¹⁴⁶ This results in missed opportunities across the child's journey to join up crucial information and responses to each child.

Adultification and racism

Many witnesses pointed to the role of adultification and racism in the criminalisation of children. Black children remain overrepresented in the youth justice system, accounting for 11% of all children cautioned or sentenced compared with 6% of the 10 to 17 population, although the number of black children cautioned or sentenced decreased by 10% compared with the previous year.¹⁴⁷

"To be a Black child in London means you're more likely to be overlooked. It means there is that essence of vulnerability not afforded to you. It means there is hyper-invisibility when it comes to you are in a vulnerability and needing more support. It means there is hyper-visibility when you are then perceived as prevalent to criminality. ... There is a way in which we discharge our safeguarding duties, when you are from a particular background, and there are various different assumptions and stereotypes which feed into how we understand the experiences of racialised communities."

Jahnine Davis

A key factor in the criminalisation of children, adultification, occurs when preconceptions held about children lead to them being treated and perceived as being an adult, with a failure to recognise safeguarding risks and needs.¹⁴⁸ Where children are 'seen' as more adult-like, further assumptions may be made about a child, including the perception that they have more agency, autonomy and choice.

"I think it's about communicating the fact that any young person who is a victim of child criminal exploitation is just that: they are a victim, they're not a perpetrator. I think that mindset change is both important and difficult."

Cllr Ash Lister



We heard that this inequality of response resulted in boys, and Black boys in particular, not being given an adequate safeguarding response; this may be exacerbated by boys – anecdotally – requiring more support than girls to understand that they have been exploited.¹⁴⁹

We heard that missing children were not always being adequately safeguarded. Inspections of children's services have identified that information from return home interviews were not routinely analysed and used for future safeguarding, raising 'concerns about the ability of partnerships to fully understand local risks and use information in a timely way to target prevention and disruption of exploitation'.¹⁵⁰ In addition, witnesses noted insufficient responses to families from ethnic minority communities who report their children missing, 'with biases leading to this behaviour being viewed as 'normal' for these children'.¹⁵¹

Children's perceptions of exploitation and safeguarding

We heard particularly strong evidence that a key challenge exacerbating the tensions between safeguarding and criminal justice is the views of children and young people themselves. This has been a consistent theme in recent reviews and inquiries, including the 2022 Independent Inquiry into Child Sexual Abuse.¹⁵² Witnesses – including those with lived experience – shared the barriers inherent to children viewing themselves as having been exploited, and the complexities around the language of victimhood.

There may be many reasons that a child is unable, or unwilling, to accept their exploitation, ranging from fears of being seen as an informant, to a desire to feel adult and capable, to the emotional trauma of acknowledging abuse by trusted friends, community members and family members.

“I had a report of one young person who was told they had to move between different places with their bags. They didn't have anyone to help them. So, they rang the person they knew that had been part of their life for some time, who drove a long, long way to take them to the new place and then left them. That was the person that was grooming them and exploiting them because it was continuity of business. There is an issue, of course, that a lot of young people won't say that they're exploiters. They'll say that they're friends, and on those occasions they are. They're there for them.”

Anne Longfield

Many witnesses all acknowledged that helping children to understand their exploitation and the trauma associated with it was, in itself, a therapeutic process requiring trust and time; two qualities that can be very difficult to provide once children are within the criminal justice system. Children's perceptions of themselves can affect both how they present to agencies and how they react to the ways in which those agencies engage and speak about them, and criminalisation can make it even harder for children to see themselves as victims. The Howard League has experience of a number of cases where authorities have refused to act to keep children safe because substantial details have not been provided, even though children may be scared of providing such information.¹⁵³ The Centre for Social Justice noted that the 'perverse result' of continuing prosecutions of children can mean that victims are forced to stand trial alongside those who have been exploiting them.¹⁵⁴

“The young people don't recognise that they're even being exploited. Some of these guys have done such a good job of exploiting the young people that they feel like their uncles and brothers and best friends. So when you say to them they're being exploited they just don't want to hear it and they become really hostile towards us: “I'm not flipping daft. I'm no a dafty, how could I be exploited, I'm doing the exploiting. And they're only 13, 14 years old.”

P, Action for Children mentor

Witnesses also noted that 'safeguarding' from a child's perspective, particularly for older teenagers, may entail significant restrictions on their freedom that act as a barrier to asking for and accepting help, or cause the child to withhold information on the extent of abuse.

“Safeguarding, for a young person, can look like being forced to live somewhere you don't want to live, being forced to speak to a social worker – a complete stranger you don't know – and having somebody else tell you what to do. That doesn't mean they don't want the exploitation to stop. They are entirely different things. So, I have many young people who want the exploitation to stop, want to stop being placed in uncomfortable positions, who want to stop being forced to stay in crack houses, or being subjected to violence when they're not doing what they're told, but they don't want a social worker. They don't want to be moved to Cumbria.”

Shauneen Lambe

We heard evidence from Northern Ireland of the continuing influence of paramilitaries as enduring criminal networks embedded in communities. In some areas, this activity creates a 'community norm' that prevents safeguarding behaviour, creating a narrative that, in the absence of trust in public bodies, they are performing a community function.¹⁵⁵

Consideration of Child Sexual Exploitation

The perception of criminal exploitation, both in terms of public awareness and political narrative, was cited as an important factor in the wording of guidance and practice. A useful parallel was drawn by many witnesses with the shift that had occurred around the perception of and approach to child sexual exploitation, with the removal in 2015, through the Serious Crime Act, of the term 'child prostitution' from across a number of older pieces of legislation. A key new definition of child sexual exploitation was published by the government in 2016 that made clear that this was a form of child abuse to be handled under sexual offences legislation, and an agreed set of responses developed as part of child protection procedures; these were described by Social Work Scotland as 'a real game-changer' in terms of local responses and cultural shifts.

Witnesses noted that there are now clear disparities in how criminal exploitation is viewed and responded to compared to sexual exploitation, and that 'placing CCE as needing a child protection response is critical'.¹⁵⁶

5.4 Local responses to criminal exploitation

Local responses to exploitation aim to create a 'protective system'¹⁵⁷ that combines a safeguarding response focused on the child, and a policing response focused on preventing.

Broadly, these follow three stages aligned with the stages of 'target, test, trap' in a child's journey through exploitation*:

- Preventing exploitation from occurring. This safeguarding response focuses on identifying children who may be vulnerable to exploitation and supporting them – alongside their families – to reduce risk and mitigate vulnerabilities. The police response focuses on both identifying children at risk and identifying and disrupting the activities of perpetrators.
- Disrupting the process of exploitation when it begins. This combines robust child protection responses with police activity to target perpetrators, often through good use of information-sharing between local agencies.
- Supporting children who are exploited. The safeguarding response includes a focus on reducing harm to the child, transitional support into adulthood, and activity to prevent children being re-exploited. The youth justice and legal responses at this stage may focus on prosecution of perpetrators and using legal mechanisms to protect the child from criminalisation.

*Adapted with permission from The Children's Society (2019)

As described in section 5.3, these two systems can come into tension at various points through a child's experience of exploitation, most acutely at the point at which a child has committed an offence or where risk or offending escalates. However, we heard from witnesses from all local safeguarding partners including police and health that, even from the very start of the process before criminal activity has occurred, there are a number of systemic, practical and cultural barriers that combine to make it even more challenging for practitioners to work together to identify and support children.

The care system and extra-familial harm

In recent years there has been a growing acknowledgement across government, criminal justice and children's services of extra-familial harm, or risk outside the home, as the key child protection risk for adolescents. This encompasses risks in environments and contexts outside a young person's home, including school, public places and online platforms. These risks are shaped by peers and relationships, interact with social and economic trends (including gender norms, racism and poverty) and may involve children perpetrating criminal offences as well as being the victim of them.

In the year to 31 March 2023,

27%



of children entering care in England were aged 10-15 (8,910); a further 27% were aged over 16 (9,070).

This compares to figures for 2013, when 13% were aged 16 and over (3,690 children).¹⁵⁸ A similar pattern can be seen in the rest of the UK. In Scotland, 34% of children entering care in 2022 were aged 12-17, with the number of 16 and 17 year olds increasing four-fold since 2012.¹⁵⁹ In 2022-23, 17% of children in care in Northern Ireland¹⁶⁰ and 18% in Wales¹⁶¹ were aged over 16.

That a large proportion of children in care are now teenagers, with very different needs to those of younger children, has shifted the requirements of the child protection and care system significantly and rapidly without a similar scale of change in frameworks, practice guidance, funding or infrastructure needed to respond. Though the rising complexity of adolescents facing extrafamilial harm has been known for many years, the scale and complexity of the number of children coming into the system has been incredibly rapid, at a time in which funding and service capacity have decreased.

“Those children have come in because there's been a greater understanding of exploitation and teenage risk, including CCE. But the system itself has never modernised to keep up with it. So the core system doesn't really have an adequate care service to offer these children if they're deemed to be so at risk they can't stay with their parents.”

Anne Longfield

Safeguarding

We heard that, in contrast to safeguarding in early childhood, which primarily focuses on abuse, neglect and harm within the family home, extra-familial harm in older children is ‘often beyond the control of parents, and rarely instigated by parents’¹⁶² and can lead to children entering care for the first time as teenagers. Family-focused services are not always appropriate or able to support children who are exploited outside their homes. The link between intra- and extra-familial harm is complicated, as older children may spend more time away from a neglectful or abusive home in environments that present other kinds of risk.

“Once a child has a debt on their heads, increasing parental capacity doesn’t get rid of it.”

Professor Carlene Firmin

The concept of contextual safeguarding, developed by Professor Carlene Firmin in 2015, was first included in Department for Education guidance in 2018¹⁶³ and has been rapidly taken up by government departments and local services. The Home Office guidance on criminal exploitation and county lines, first published in 2018, was updated in October 2023 to include much more detail on different kinds of exploitation and the use of child-centred approaches including contextual safeguarding.¹⁶⁴ The government’s children’s social care strategy, *Stable Homes, Built on Love*, also notes the importance of tackling harms outside of the home or extra-familial harms.¹⁶⁵ As county lines has moved from being an ‘emerging’ issue to a key focus of government policy, contextual safeguarding has been joined in national and local policy by other child-centred approaches including trauma-informed practice and transitional safeguarding. In her evidence to the Review, the Children’s Commissioner for England stated that:

“Addressing these forms of harms has been perhaps one of the most significant shifts in children’s social care practice since the Children Act 1989 was introduced. The Children Act was framed around protecting children from harm within their homes. Since then, there has been an increased understanding of the risks outside of the family faced by children, particularly older children.”

Bringing children into care is the ultimate approach for keeping children safe from harms within the home, but this doesn’t always work if the harm comes from beyond the home. ... government children’s social care reforms should be a chance to think afresh about what legal protections are needed for this group of children.”

Children’s Commissioner for England

We heard that the increases in extra-familial harm are not adequately addressed in existing safeguarding legislation. The fluctuating levels of risk associated with exploitation may also mean that a child fails to reach required thresholds outside of points of crisis, making early help services less effective. The time-limited nature of service delivery, adherence to office hours and staff turnover can hinder opportunities to form trusting relationships with children.

As described by a family court judge, contextual safeguarding requires ‘bucking the hardwiring of the family justice system, which is, essentially: a child is in risk of immediate danger, therefore we need to extricate them from the risk, move them away and keep them safe’.¹⁶⁶

Witnesses who spoke about contextual safeguarding emphasised the need for a specific, clear pathway for handling risk outside the home, akin to that of abuse and neglect, with outcomes frameworks that can value contextual interventions. This would include consistency and clarity on what’s meant by a welfare or safeguarding response, and an assessment framework for all the contexts in which a child spends time (including family, friends, school and public places). It was emphasised that this should allow for local discretion; contextual safeguarding should not be a model that’s followed, but a set of principles embedded into policy and practice.¹⁶⁷ Escalation procedures were considered essential in dealing with blockages or challenges in responding to extra-familial risk within the partnership as well as ensuring an approach adopted following a set of core principles: collaborative, ecological, rights-based, strengths-based and evidence-informed.¹⁶⁸

A crucial element of responses to extra-familial harm is the role of families as partners in creating a safe context for children. This entails a very different kind of relationship with families from that in standard child protection processes, in which the family is the source of harm.

It requires a cultural shift among child protection teams and safeguarding partnerships, not merely a structural one, with professionals ‘used to coming to child protection conferences solely to hold a parent to account, not to hold themselves to account’.¹⁶⁹ We heard often during the review from parents with lived experience that the attitude of services towards them had too often been one of suspicion, blame or indifference.

Witnesses noted that the balance between familial and extra-familial harm was unknown and that, until recently, children would not be eligible for child protection support if the family were deemed to be sufficiently protective.

Variation in child protection responses

Witnesses, including Ofsted, generally thought that the response to exploitation across the country was an improving picture, but that it was uncoordinated in some areas:

“Investment in analysts, for example, can make a real difference to the ability to identify and respond to risk quickly. Where we see it going wrong is where there’s lots of agencies trying to work with the child, but it’s not coordinated. It’s disjointed and a child is retelling their stories to different people for different purposes. Not all professionals have the full picture so they do not understand the child’s needs and the risks to them.”

Lisa Pascoe

We heard that local authority areas are developing their own ways of working around criminal exploitation and extra-familial harm more broadly, due to the lack of clear pathways from government about what works. This meant that ‘depending on where you live as a child, that will influence what the partnership response is. In some areas the responses are effective and respond well to local risk and need, in other areas responses are much less effective’.¹⁷⁰ This was leading to children falling through the gaps, both in terms of geographically between local authority and national borders, and also across different sectors and systems. This gap in statutory guidance had led to ‘huge variance locally around whether children are even on child protection plans of any kind if the harm is extra-familial’.¹⁷¹ Ofsted noted that Working Together to Safeguard Children was limited in guiding responses to harm outside the home (though at the time of the Review the new Working Together had not yet been published).¹⁷²

Witnesses stressed the importance of local areas having the freedom to design responses that worked for their children and communities (“what might work in the central belt for Edinburgh and Glasgow isn’t necessarily going to work for Argyll and Bute”¹⁷³) but within the context of a clear national pathway.

We heard that where strategic practice is good, this is due to local partnerships and committees (including safeguarding, health and community safety) all playing their part in a local plan. In others areas, witnesses stated that there is no shared understanding across multi-agency partners of what constitutes exploitation, with ‘a danger it is only recognised as county lines and only when the most serious harms are taking place’.¹⁷⁴

We heard that there is a siloed approach, with exploitation, serious violence, sexual abuse, domestic violence and the Prevent and Neglect strategies in England all considered separately, with policies produced in isolation. As there is no nationally agreed level of risk, local areas are using different criteria to assess, triage and allocate services. This lack of coherence filters down to parents, who gave evidence that it was often not clear where or to whom they were expected to go to for help.

We heard evidence on the success of many targeted interventions both with specific children and across entire geographical areas. These included programmes for at-risk children that took a public health approach to reducing serious violence and exploitation, such as the Violence Reduction Units and, in Northern Ireland, minimising children’s susceptibility to paramilitary influence; the use of specialist practitioners in settings where children may be more likely to ask for help, including A&E departments, schools and alternative education provision; and pilots on a range of procedural changes, including the development of pathways for extra-familial harm, and devolving NRM decisions to local areas.

Though all of these initiatives (and many more not covered here) were positively regarded, with many seen as being vital in progressing the response to exploitation, a number of witnesses noted that they had created pockets of practice that increased the variability of response across the nations. There was a view that the learning and practice from these pilots was not translating quickly enough into a whole-nation approach, and in some cases had worsened the complexities of multi-agency or cross-country working, with children losing access to previous support if they moved outside the limited geographical coverage of a particular initiative or approach.

Challenges for local safeguarding partners

“I think that all agencies in those three statutory partners need to remember that safeguarding children is a joint responsibility, and you may work to slightly different legislation or slightly different inspectorates, but actually, it’s still the child that’s at the centre of that work, and I think that often gets forgotten.”

Jo Procter

Collaboration among agencies working with children is essential for ensuring children receive the best safeguarding and support to promote their wellbeing. The basics of good multi-agency working include a collaborative environment, informed leaders, clear roles, continuous learning and effective information sharing.¹⁷⁵ This includes shared definitions, goals and understanding of vulnerabilities and risks among partner agencies. A scoping review of criminal exploitation of children in Scotland found that successful interventions were child-centred, trauma-informed, rights-based, strengths-based and tailored to the child’s specific needs.¹⁷⁶

These local partnerships were seen to be not as strong as they could be, for a number of reasons:

- Education not being a statutory partner in England, despite the core role of schools and other educational institutions as a protective factor in children’s lives.
- Voluntary and Community Sector organisations are not always well-represented at local partnership level and have variable expertise regarding statutory processes.
- Levels of engagement vary across partners and partnerships.
- Sometimes, a lack of joined-up data and information sharing: ‘So you end up in a situation where for one child you could potentially have four or five different views on them, all of which should be looking at things jointly and they don’t.’¹⁷⁷

There is variation across the country about which agency leads or chairs partnerships. Though witnesses agreed that local structures needed the flexibility to respond to the needs of each area, there was a clear view that the lead organisation in those partnerships should not be left open. The rationale for this was based on the intended priority being a safeguarding rather than a criminal justice response to exploitation.

It was suggested by the Children’s Commissioner for England that the functions of Local Safeguarding Partnerships, Health and Wellbeing Boards, Adult Safeguarding Boards, and Community Safety Partnerships could be rationalised, ‘and the bodies merged with consolidated duties, powers, funding, and accountability’¹⁷⁸ with schools having a formal role.

Accountability of safeguarding partners

Witnesses discussed the lack of accountability structures within safeguarding partnerships, and how to ensure that all were on board. Some witnesses described the importance of building strong and trusting relationships across partners, and taking account of varying levels of understanding and engagement with exploitation:

“... once you put the term ‘criminal’ in the middle of that, sometimes it’s very easy for partners to either absolve their responsibility to more professional bodies in their eyes, or it’s hard to see how they make an impact and how they could contribute to the end goal. So you have to have clear lines of communication and clear expectations from the very start around, this is what we want to achieve, this is how we’re going to achieve it, and this is what success will look like.”

Steven Hume

Other witnesses held the view that there should be much clearer lines of accountability for all agencies in safeguarding partnerships and guidance on how partners or services can be held accountable by the lead partner if they have acted in ways that escalate the risk to a child or are not committing resource to a safeguarding plan.

“I am deeply concerned that I struggle to find who within a local authority is pulling together a list of the children that we should be most concerned about when the harm comes from outside the home, who is empowered within the local authority to hold other parts of the local authority accountable.”

The role of education

Witnesses were near unanimous in their recommendation that schools played a crucial role preventing exploitation and supporting children and – with the right support and resource – should be made a fourth statutory safeguarding partner, a step that the Department for Education has said that it will consider in England.

The reasons given for this were twofold:

- That schools (and education institutions more widely) are a key protective factor in the lives of children, being the universal service that spends by far the most time with children and families, helping to identify changes in behaviour and safeguarding concerns, and a key delivery mechanism for a range of interventions.
- That, exacerbated by the rapid roll-out of the academies programme in England, some schools were not engaged enough in understanding exploitation and, increasingly, were making decisions involving exclusion or behavioural sanctions that went against the best interests of a child at risk of harm.

Although a head teacher is required to consider any contributing factors identified following an incident of misbehaviour, the Suspension and Permanent Exclusion statutory guidance for England and Wales makes no explicit mention of criminal exploitation.¹⁷⁹

We heard that in some areas it is hard to engage academies because they aren’t required to work with local authorities, and that this limits the information sharing they can have and training they can provide. ‘Once a child has been excluded, Youth Justice have to do a lot of advocacy work to get the child back into education.’¹⁸⁰

“You then see managed moves here, there and everywhere, no one wanting to hold the child... when you think about the impact that has on a child. Not only are they experiencing fragmented education, there is something about that constant feeling like you don’t belong. It’s like that push and pull constantly, in terms of: well, no one wants me. But those people over there, that group, they understand me.”

Jahnine Davis

We heard that, in Scotland, exclusion is less of a concern than reduced timetables. Though exclusion rates had reduced (from 44,794 exclusions noted in 2006/2007 to 8,322 in 2020/2021),¹⁸¹ post-Covid some children were in school for only a few hours a week.

The view of witnesses was that schools are not funded to provide the level of inclusion support that they need and want to.

The significant impact of being excluded – whether officially or unofficially – from education was a running theme across all the stories we heard from those with lived experience. The correlation with exploitation is clear and children and parents often described that as being the tipping point at which things began to go wrong quickly.

“Social workers I know will feel very frustrated if they complete an assessment and they say, ‘The biggest risk to this child’s welfare at the moment is an exclusion from school.’ If they are excluded from school, their risk will escalate, because the only provision available to them is this pupil referral unit. We know if they go there, the risk to them will escalate. The school decides they’re going to exclude the child anyway... Which can leave people feeling very, well, what is the point of doing this if there’s no teeth to what we’re doing?”

Professor Carlene Firmin

We heard that schools have competing priorities and responsibilities, both in the outcomes they have to deliver and in managing the safety and needs of a large student body, and many individual schools were working incredibly hard under intense pressure, but that not enough focus was given to the challenges this raised in terms of keeping vulnerable children safe. Witnesses noted that schools are measured by Ofsted primarily around grades. This had created incentives for some schools to remove children who are unlikely to be able to get the grades that they need without support.

“We’re saying these children need protection, they need to be cared for, they need to be kept safe. Yet, at the same time, aspects of their behaviour make it really difficult for schools, and they’re saying, ‘We can’t keep other people safe, so you can’t come here.’ So we’ve got that dichotomy between, ‘Well, we need to keep you safe, but we’re not actually going to keep you in this environment where we know if you are here, that can reduce the risk of you being exploited.”

Donna McEwan

It was noted that schools were required to strike a difficult balance in their response to the behaviour of exploited children when it affected other children around them, particularly when there were other vulnerable children in the school community.

"As an example there have been situations where children have brought drugs into a school. Now, do we deal with those as exploited children who are carrying drugs for a gang, or do we deal with them as children who are coming into the school with the potential to sell drugs, because they're being forced to do so? Both need an approach, but obviously you can't have a child that's selling drugs in school! A school has to consider the risks to the individual child, to the other children, and you have to consider the voice of the parent. The challenge is to safely address situations whilst also trying to keep exclusions to an absolute minimum."

Dr Jon Needham

Though we heard many examples of collaborative relationships between individual schools and local partners, witnesses also described challenges in engaging schools as a group across local authority areas as a whole. This was partly due to the 'fragmented' nature of local education systems and the lack of local education leadership post-academisation. It was noted that schools need support to understand and enact their role in local safeguarding.

"What we have at the minute are very willing, very proactive, effective schools on the front line at grassroots level, dealing with some very complex issues, and they're looking to others to try and solve them."

Steven Hume



Witnesses noted that it would be helpful if clear expectations of schools around inclusion were issued by the Department for Education and Ofsted, with incentives for education settings to avoid temporary or permanent exclusions. Also noted was the paucity of good alternative provision for children who had been excluded, with alternative settings acting as a recruitment ground for exploiters.

"I've said to those that are running [alternative provision], 'How many children here are involved in gangs or county lines?' One I went to see and he said, 'Well, about 50 per cent,' and then he said, 'Well, hang on, are you including runners, because then it will be 80.' ... This is the scale we're talking about."

Anne Longfield

Service constraints

The combination of severe funding cuts over the past decade and a change in the needs of children requiring protection is placing severe constraints on the capacity of services to support children and families where and when it is needed.

Referrals to children's services in England have returned to pre-pandemic levels, with an increase of 8.5% between 2021 and 2022.

£11.1

billion was spent by English local authorities on children's social care in 2021/23, a rise of 42% since 2009/10, while the number of children and family social workers has reduced.¹⁸²



We heard how the vulnerability of teenagers had accelerated during the pandemic at a time when the ability of services to identify and support those at risk of exploitation was severely hampered.

Witnesses noted a mismatch in the progress made by local and national agencies in understanding the support that exploited children should receive, and being able to practically access that support:

"It's fantastic if youth offending teams want to give children access to therapy, or want to make sure they've got a keyworker to solve problems within the family, but that's absolutely no good at all if actually the child isn't being referred by the police into youth justice services. And absolutely no good at all if the access to therapy isn't there."

Jon Yates

Witnesses painted a picture of pockets of successful initiatives attempting to work within a given structure rather than reform the system.

Ofsted gave evidence to the Review on the challenges faced by local authorities, which include:

- An increase in children who require specialist provision that can support complex needs and, in particular, mental health needs.
- A lack of secure provision for children nationally, meaning alternative places need to be found for children with complex needs.
- Issues with recruitment and retention of foster carers, residential care workers and other social care and wider children's professionals.
- Not having the right quantity and mix of provision for the children, including those harmed and at risk from exploitation.
- Too many children in unregistered provision with no regulatory oversight.

In common with other witnesses, Ofsted noted that local authorities were now working in an increasingly privatised care market, in which 'private providers have more power and local authorities have little choice'. The Welsh government has proposed changes to primary legislation to eliminate profit from the care of looked after children.

We also heard about the importance of the youth and community workforce, including detached youth workers, most of whom work in the voluntary sector. The impact of youth work is well evidenced.¹⁸³ We heard that local authorities with statutory youth work provision have very strong relationships with local safeguarding arrangements. Youth and community workers are very well placed to have local community intelligence and are often the first people to be aware of threats to children, including those who are missing from school. However, many local authorities have no statutory offer, with the consensus being that this was due to austerity. We heard that, in real terms, the youth sector has lost £1.4 billion a year over the past 10 years. It was noted that some local authorities had found ways to operationalise it, for example in Rochdale it is funded through the public health budget.¹⁸⁴

We heard from one head of service in Scotland of the very practical impact of these constraints on the ability of child protection teams to respond at moments of crisis. In one case we heard about a child who had been found by police at a motorway service station late at night:

“We know they’re a child. We don’t know where they’re from. They’re not telling us anything. We can’t access a national database to find out which children are missing; could this child be one of them? If we do know where the child is from, we can contact the out-of-hours service for that child’s home authority but they might not be able to give us very much information about them – we don’t provide daytime services at night, but that’s quite often when these children come to our attention. So in that crisis point, which could be 2 o’clock on a Saturday morning, we can’t find out anything about this child. ... We’ve literally just laid hands on them, and want to keep our hands on them, but we don’t want to keep them in a police station. It’s very difficult in terms of trying to work out where do they belong? How do we contact family?”

The police won’t arrest a child unless the child had committed an offence, but they would need to take them to a place of safety. In the first instance, that place of safety would probably be a police station. Since the age of criminal responsibility [has been raised] and the Scottish Child Interview Model [introduced], most police stations in Scotland have appropriate facilities for children, but it’s still not an environment you would want a child to be in. They will then phone my out-of-hours service and say, ‘You need to come and get this child.’ But I have nowhere to accommodate that child.”

Alison Penman

Out-of-area placements

“Some kids have said to me ‘I don’t even know where I am on a map’”

Anne Longfield

This situation is exacerbated by the UK-wide crisis of foster placements, particularly for older children.

The rise in adolescents in care in a system designed for younger children has contributed to a crisis of suitable placements and accommodation. Increasingly over the past 10 years, children have been placed out of area; in semi-regulated or unregulated accommodation; and in residential children’s homes. The scarcity of placements and the private care market means that children may be placed far from home; this, in turn, exacerbates placement shortages in local areas.¹⁸⁵ This practice was seen as unacceptable by a number of witnesses, who stated that children should be placed ‘as close to their home communities as it is safe to do so’¹⁸⁶. Others stressed that geographical moves were an essential tool in keeping children safe. However, all agreed that the placement decisions should be driven entirely by the child’s best interests, not a lack of provision closer to home.

When children are placed far from their geographic support networks they are made more vulnerable to forming relationships with people who might exploit them; we heard that this was especially true for children who were moved due to their risk of exploitation.¹⁸⁷ The situation was particularly acute in the case of migrant children and unaccompanied asylum seeking children, whom the Home Office has in the past two years housed in hotels. Evidence from ECPAT UK stated that 222 unaccompanied asylum-seeking children had been kidnapped from hotels run by the Home Office.¹⁸⁸ We heard that there had been a small number of incidents in which children in Scottish placements had been followed by their exploiters from England, and that ‘there will be many examples which we are not aware of’.¹⁸⁹

The dearth of provision for these children, including the lack of therapeutic placements and the use of placements far from the young person’s home, was described by one witness as ‘the risk that we’re swapping one form of trauma for another’.¹⁹⁰

5.5 Early intervention and prevention

Witnesses repeatedly emphasised the importance of identifying and supporting children at risk as early as possible, including through universal services. In particular, witnesses remarked on the importance of preventing children from being in contact with the criminal justice system as this, in itself, was a key vulnerability for exploitation. Early intervention was described as ‘vital’ in preventing children from becoming ‘entrenched in exploitation, where it is then increasingly difficult to divert them’.¹⁹¹

“I know it’s the thing everyone says: ‘early intervention’. But honestly, it really is early intervention, because a lot of these children have always been in plain sight. We’ve known about them before; they’ve been in our system. By the time we’re working with them, we are being reactive and not proactive.”

Jahnine Davis

We heard evidence on the range of early interventions and ways of working with children and families that had been shown to be successful. This included ensuring that parents are seen as a protective factor and that interventions are child-centred, trauma-informed and work with the family as a whole, including being aware of contextual factors such as ethnicity, poverty, unstable housing or employment and mental ill-health. Contextual Safeguarding was cited by many witnesses as being a core approach to preventing exploitation, in addition to identifying its risk and reducing harm. Witnesses emphasised that interventions needed to be responsive to each child’s needs, both to make sure they were effective and to build trust, and that ‘ensuring the safety of the child and their families will maximise their ability to engage with interventions’ if further support is needed.¹⁹² In addition, witnesses emphasised the importance of providing interventions at ‘crisis points’ in children’s lives when swift support can make the most difference; these included being excluded from school, going missing, and being injured or arrested.



However, a lack of availability of early intervention support – what one witness called ‘a complete void in pre-care, more flexible support’¹⁹³ – was seen to be a key driver of children becoming exploited in ways that were preventable, and of children entering the care and criminal justice systems.

This was described as being due to a range of factors including:

- The lack of confidence in practitioners to work with families to keep children at home.
- A lack of interventions on the scale needed to prevent children being taken into care, or to support reunification.
- Barriers to universal and targeted services for families and communities for whom it is not socially acceptable to ask for help.¹⁹⁴
- A lack of responsive, swift support when families do ask for help.
- A lack of funding and capacity to offer the interventions and level of support that families need.

Witnesses emphasised that parents were vital in spotting the signs of exploitation and supporting their children to avoid or extricate themselves from criminality, but that child protection services often lacked the resource or understanding of exploitation to work with parents as partners.

Funding

The challenge of resource, capacity and capability and, in particular, the challenge of providing early intervention, was a consistent theme. A decade of funding cuts to early help services, coupled with an increase in need, has raised thresholds for support and restricted the ability of services to respond to children proactively. Witnesses were of the view that too many chances to support children are missed before crisis hits.

Funding for early intervention decreased by

46%

between 2010 and 2022, with reductions including children's centres and youth services.



This is set against a 47% increase in late intervention spending including children in care.¹⁹⁵

Cuts to volunteering support are being cited as a 'real missed opportunity to connect into people that are working at the heart of communities to create better solutions'.¹⁹⁶ One witness described Community Safety Partnerships as having been 'decimated'. Young people, too, described the hole that this had left in community support structures:

"The thing that stood out to me was the youth clubs, that they've all closed down. Like back when I was a kid, there was plenty of youth clubs going around. These days, there's nothing there. In all the different areas, there is hardly anything there for the kids to do. For example, if the kid doesn't get on in school, and he gets kicked out of school, he's just going to be on the streets without any support. When there was youth clubs, it was better. There was more of a family connection. There was more community. If there was somebody struggling and they got caught up in some type of gang culture, or if they got caught up and they were groomed by these guys, they would have received support by the youth club. They would have been helped. They would have been sent on their way to have made better decisions in life."

These days, it's like the kids out there, they're drowning. They're only looking to each other for support. Then we wonder why there's so many issues with the drugs, the alcohol, the knife crime."

Femi, young person with experience of exploitation

Funding pressures were also felt to influence the sharper end of exploitation. Witnesses felt there was limited time and resources to do the hard work of identifying exploitation, with drug or theft offences being much easier to evidence than exploitation as they do not require proof of coercion or manipulation on the part of the exploiter. Funding had an impact on the ability of services and agencies to collaborate, with witnesses noting that there was an ever-decreasing pot of money for which local and national organisations were often competing, rather than a collective resource to support responding to the challenge of exploitation. We heard how hard it can be for local areas to pool local resource and that collective resource could be helpfully modelled by national government; for example, in the form of a cross-departmental innovation fund.¹⁹⁷

The lack of consistency of funding – both for core services and for programmes that specifically tackle child exploitation – is a barrier to sustainable outcomes and prevents a focus on prevention or early intervention. Victims of exploitation may develop a deep mistrust of adults and authorities. Agencies must work to develop trusted relationships to encourage the child to engage with support. This takes time, persistence and flexibility, which current funding arrangements do not allow. We heard that pilots are wound up quickly and are too focused on short-term results. It was felt that time-limited funding resulted in restricted provision of specialist services for children, patchy service responses and a 'postcode lottery'.

"Often what little funding is in place is short-term funding which allows for a short, focused piece of work. Often we end up signposting children not safeguarding them. The funding needs to be for longer periods which would allow for long-term relationships to be forged and a greater chance of positive impacts."

Cambridgeshire and Peterborough Safeguarding Partnership Boards

"This issue cannot just be dealt with by short-term funding. It needs sustainability. I benefitted in Merseyside as the deputy chief constable and having a funding stream around county lines, as you will know, of three forces and BTP [British Transport Police] as well. We benefitted from night-time economy funding and we benefitted from funding around violence reduction units. That was not sustainable ... this needs a strategic long-term sustainable approach, particularly around prevention."

Ian Critchley

Funding, timeframes, and outcomes expectations all made it difficult to create and improve services that worked for children and young people, especially where intensive support is needed over a long period of time.

The economic benefit of early intervention

The reduction in funding was described as being a false economy. In addition to the benefits to children, investing in early intervention is well-evidenced in its value for money, and avoids the substantial additional costs to the public purse. These include crisis support, high-intensity care placements, A&E attendance, police time and costs to the youth justice system.

"You look at it and think, why is this not funded? It just seems totally nonsensical when, brass tacks, the economic burden of not doing it is far outweighed by the benefits. Getting people back into taxpaying status. People going on to work and have jobs and look after their family... healthy, safe, productive members of society."

James Dunn

In addition to the macroeconomic benefits of diverting children from the criminal justice and care systems, small-scale, evidence-based early intervention programmes have also been shown to be hugely cost effective. The Youth Endowment Fund gave the example that youth workers or specially trained teachers running 'violence in relationship' sessions in schools, which might cost between £3,000 and £6,000 per secondary school, had been shown to reduce violence by 17%.¹⁹⁸ A return on investment evaluation of the Action for Children service in Glasgow looking at 181 young people supported by the service between 2018 and 2021 had shown that the value of diverting these young people from serious organised crime was £2.5 million.¹⁹⁹

"We know we need to get in early. We know that's where the best successes are, but when you look at our structures and the funding across the public sector at the moment, it's very much firefighting. So everything goes into your crisis management situations, without really being able to invest fully in preventative services. So again, I think this false assurance is given that we have a preventative agenda in place and I'm not convinced that's fully resourced and funded."

Jo Procter

This mismatch between knowing the benefits of early intervention and yet not funding it has been recognised and reiterated often by government and national agencies alike. The 2022 National Audit Office report on support for vulnerable adolescents noted that the long-term harm of exploitation included entry in the care system; contact with the criminal justice system; periods of not being in education, employment or training; and severe mental health difficulties. Likewise, the House of Commons Public Accounts Committee noted in 2018 that reductions in funding for wider public services have not necessarily reduced spend overall but instead resulted in 'cost-shunting' to law enforcement agencies.²⁰⁰



5.6 Information, data sharing and learning

“When we talk about criminal exploitation, we have certain images... there’s a tension between what we know and what we think we know, and how we’re operationalising that in supporting young people and communities.”

Abbee McLatchie

Children cannot be safeguarded from exploitation if we do not know where, how and to whom exploitation is happening across the nations. We heard from witnesses that a lack of local and national data, information sharing and systemic learning is hindering the ability of practitioners, agencies and government to understand the scale and extent of the criminal exploitation of children, patterns of criminal activity, priority areas of focus and whether progress is being made. Efforts to work collaboratively are being frustrated by difficulties in data and information sharing, including IT systems that are incompatible, requirements to record data in different ways, and concerns about GDPR.

The links between different forms of exploitation are complex and available data is not comprehensive. The lack of a formal definition of the criminal exploitation of children means there is no reliable data collection on the overall scale of the problem across the UK. While the NRM and social care data give the most robust indicators, additional data is split from multiple sources including police, serious case reviews and local support services, with each source using its own definition.

Local authorities referred the largest share of potential victims experiencing modern slavery as children into the NRM from 2015-2023, representing 47% (16,446 children) of all referrals across this period. However, research by ECPAT UK showed that half of all referring local authorities could not provide basic information on the children referred such as gender, nationality, location of exploitation, exploitation type, county lines, reasonable grounds decision and conclusive grounds decisions.²⁰³ The NRM data released by the Home Office also does not record the age, ethnicity, care status or many other characteristics of the children whose cases it decides on.

‘The tip of the iceberg’

Witnesses noted that limited data ‘simultaneously highlights and exacerbates the difficulty in trying to understand the prevalence, scale and extent of CCE’.²⁰⁴ It was also noted that drawing on evidence of who currently receives a service or intervention is problematic – ‘partly because service access is a poor proxy for actual need, and partly because doing so could perpetuate existing disproportionality (e.g. young black men being seen as the primary group ‘at risk’).²⁰⁵

That criminal exploitation is not recognised as a specific criminal offence in the home nations means that data on the number of charges, prosecutions and convictions that involve exploitation of children under the relevant Acts covering modern slavery and human trafficking is unavailable.²⁰⁶ Similarly, two legal orders are available in Scotland (TEPO and TERO) that impose restrictions on those who are deemed a risk of exploiting children but, while child criminal exploitation is a specific category that is noted, there is no data on how many orders have been issued.²⁰⁷

We heard that, in addition, systems such as the NRM tend to only capture the primary exploitation type, rather than taking into account the complexity of risk and harm a child is experiencing. As a result, the number of criminally exploited boys who are also sexually exploited remains unknown, as does the number of sexually exploited girls who are also criminally exploited. In its 2022 report on child sexual exploitation by organised networks, the Independently Inquiry into Child Sexual Abuse commented that using an umbrella criminal exploitation model to cover all forms of exploitation ‘comes at the cost of making sexual exploitation even more of a hidden problem and increasingly underestimated’.²⁰⁸

Witnesses told us that, from the perspective of anyone working with children, the frequency and severity of incidents involving teenagers had increased significantly but that, without more comprehensive data, the number of children subject to such harms and the full range of these would remain unknown.²⁰⁹

The cliff edge at 18

Exploitation does not stop at the end of childhood, and children may become more vulnerable as professional support is withdrawn at the age of 18. Yet we heard that there is very little resource available to local areas seeking to support young adults. Witnesses stated there is increased recognition and focus on the importance of transitional safeguarding through various periods of increased vulnerability for children; these included starting secondary school, moving into a new area, leaving school to enter training or employment and, for those in care, leaving care to become independent.

For children receiving additional support from Child and Adolescent Mental Health Services (CAMHS), social care or the health service, the transition to adulthood brought with it transition from children’s to adults’ teams with new practitioners and ways of working. It was noted that the threshold for those over 18 receiving support is much higher and that this, combined with safeguarding policies for adults not having been designed to tackle the exploitation of young adults, means that ‘too many young people have professional support withdrawn at a time when exploitation is still a key risk in their lives.

At worst, it can mean that a young person ensnared in criminal exploitation can face a punitive response rather than a protective response – when nothing else in their life has changed apart from their birthday.²⁰¹ For children involved in the criminal justice system, this transition could be particularly difficult when age limits or eligibility determine, for example, the defences and sentencing available in criminal proceedings; the support triggered by a ‘conclusive grounds’ NRM decision; or the legal diversions available.

The Violence Reduction Unit in Northumbria summed up its evidence on this topic by stating that, ‘All of the above creates a perfect storm for those who wish to exploit our young people and cause serious harm to our communities.’²⁰²

What witnesses were sure of was that the current figures were ‘the absolute tip of the iceberg’²¹⁰ as most data sources count only those children who have reached the point of a referral. There were concerns that the methods of measuring the scale of criminal exploitation are relatively new and that this is affecting the ability of local services to respond.²¹¹ The witness testimony demonstrated that, wherever efforts were made to identify at-risk children or perpetrators more effectively, a larger part of the problem was revealed.

As an example from policing, we heard that the Tackling Organised Exploitation (TOEX) Programme – a new approach that uses data analytics and technical innovation to support police forces in disrupting organised exploitation – had revealed organised crime groups and victims who had not previously been known to any service.²¹² We heard that the success of the TOEX programme demonstrated ‘very starkly’ that with the right information, victims could be identified early. But it also demonstrated the size of the problem that had, hitherto, been hidden.

Lack of joined up data and information sharing

“

Time and time again what we see is similar sorts of mistakes where the errors arise because we’re not communicating effectively between the different groups. ... The benefits to the child far outweigh anybody else’s individual scruples about sharing information.

Dr James Dunn

Witnesses described how, even if existing systems could record and provide the data needed, because they are not connected with systems in other places and agencies, this data would still only show ‘snapshots’ of parts of the system with which children come into contact.²¹³ A referral to the NRM, for example, does not automatically trigger a child protection referral or any form of support around the child. Witnesses also noted that when children are moved into out-of-area placements, the receiving local authority is not always notified.²¹⁴ This was a particular issue with English children in care placements in Scotland:

“So we have children living in our area who are extremely vulnerable, a number of whom will be vulnerable to exploitation, but they’re not on our radar at all because we’re not notified of their presence in our area.”

Alison Penman

Almost every witness cited data as a key barrier to safeguarding children and described how this was not only frustrating for professionals but also resulted in many missed opportunities to identify and support children at moments of crisis. Witnesses were clear that, for at-risk children to be accurately identified and receive appropriate support and intervention, information about a child’s risk of exploitation must be visible to all relevant professionals across data systems and documentation. In particular, there is limited linking of health, education and social care data on children within and between local authority areas.

“What we want [information on] is children who are repeatedly coming to hospital with relatively low-grade injuries and illnesses that are just brushed off as, oh, that’s what kids do. And actually, if there was the data, the coding and the time to explore why those children were presenting, then there might be a background of difficulties at home, lack of supervision, neglect, parents working two jobs so they can’t supervise, that’s the bigger picture.”

Dr James Dunn

Data sharing between the police and social care was another significant gap. We heard that police investigations and intelligence are not always shared with child welfare organisations where the perception is that an investigation could be jeopardised as a result.²¹⁵ Likewise, social workers and third sector organisations were not always aware or confident in what they could share with police.

There have been attempts to mitigate this situation through the introduction of specific markers for criminal exploitation, as in the case of Police Scotland, and inclusion on child in need assessments, which was introduced in England in 2021. In England, there is a proposal to introduce an individual number for all children, akin to the NHS number. There was a general view that coding systems and data analysis were the key to ‘take out some of the labour’ for busy practitioners.

A misunderstanding of and caution around GDPR and data sharing regulations was discussed, with one witness noting that ‘none of us understand exactly what we can and can’t share, or argue effectively when someone says we can’t have information’.²¹⁶ The worry about data sharing and impact on safeguarding was viewed as an unintended consequence of GDPR legislation. Witnesses emphasised the importance of working together under the basis of trust, cooperation and adaptability:

“

We’re dealing with highly sensitive often and classified information from a policing perspective, we’re dealing with really sensitive and personal and traumatic issues for young people, so bringing that together to inform at initial assessment, at intervention and then response is critical, and hugely complex. It’s anxiety-provoking. It’s a difficult area to work in, so it’s absolutely required for practitioners to be confident and competent in how to respond to this, and where we see a breakdown in confidence, we see more negative outcomes for young people.”

Sharon Maciver

We heard that working together effectively required a much deeper analytical assessment of the risks around a child, a more sophisticated approach to sharing data, and the institutional and professional knowledge of how to respond. Often, exploitation was referred to in reports at ‘a superficial level, but with very little analytical assessment about the child’s risk circumstances and what might mitigate some of those risks in terms of protecting the child’.²¹⁷

It was noted by a number of witnesses that exploiters were themselves very good at identifying and targeting children, with no qualms about sharing information.

“We need systems that talk to each other, both technically, but also structurally, because that’s where the children fall in the gaps. ... In terms of intervention and prevention and strategically understanding where additional investment goes, without having a system in place that can fully capture who and where needs that additional support then we are inaccurately focusing our response.”

Karina Wane-Henry

Barriers to national systemic learning

The issues of local data collection and sharing were replicated nationally in our understanding of how organised exploitation works; the Centre for Social Justice stated that ‘... too often forces do not fully understand how often children are being criminally exploited across county lines’.

We heard that there are over a thousand mapped serious and organised crime groups across the UK, with many thousands of individuals working for them and a growing understanding of the exploitation business model. Witnesses provided multiple examples of programmes and projects where data, including police data, is being used in new ways to identify children at risk, including mapping exercises leading to a richer understanding of the groups and associations. However, this picture changes fast and relies on accurate intelligence:

“What we do see with the young persons, their associations, the group dynamics is very fluid. It changes a lot faster than what I would say your traditional OCGs do. They fall out with one another, and they quickly change affiliations, or they move schools, etc., and then their affiliation changes again. It’s very important to try and keep ahead of that curve.”

DCI Mal Stratton

We heard about the importance of learning together, as local and national systems, from case reviews of what could be improved as well as evidence of what works. It was noted that practice reviews took a lot of time and detailed work, and often contained important and timely recommendations, and that the focus should be on changes to practice:

“We’ve done all this activity, we do training, we audit. But if it makes no difference, why are we doing it? That’s very much the culture that we’ve tried to embed locally: so what. Don’t tell me that you’ve put 95% of your workforce through some child exploitation training, where’s the impact of that in the person’s practice?”

Jo Procter

“We see constantly recommendation after recommendation, serious case reviews, historical ones, local child safeguarding practice reviews. You’ve got all of these recommendations, what’s being done about them? How do we feel assured that they’re being operationalised? How are they making a difference? How is Ofsted coming in and ensuring these things are being done and seeing what differences they’ve made? They’re the things which we can be doing to bring the system along, in terms of really meaningful learning. I don’t think that’s happening.”

Jahnine Davis

Ofsted discussed the role and power of joint inspections between inspectorates in England, including the police and probation inspectorates and the Care Quality Commission (CQC). A joint thematic review was underway that covered criminal exploitation. These were a challenge in terms of resource and time, given the number of inspections in each area per year across inspectorates.

It was noted that there are many review processes in the UK, including those for child safeguarding practice, domestic homicide, multi-agency public protection arrangements, drug and alcohol, and youth justice serious incidents. Though many of these could be applicable to a young person at risk of exploitation, they sit in silos in different parts of the system. These reviews are also ‘extremely time consuming, expensive and the messages arising from them year after year are the same’.²¹⁸ It was suggested that the system could be ‘strengthened, streamlined and more cost effective if it evolved into a process and culture which focused on the process of change arising from the reviews rather than the completion of the review itself’.

Understanding what works

“If you don’t understand the scale of use of these disruption measures, then you don’t identify good practice. You don’t share good practice, you don’t encourage people to use it across the country.”

Iryna Pona

We heard that there has been ‘a dynamic explosion in research in the past few years’ into criminal exploitation²¹⁹ and that there was a need to combine local, regional, national and international research to develop services based on local knowledge of what children need. In addition to learning from reviews of serious incidents, witnesses emphasised the need for high-quality and reliable research on what works. We heard from the Youth Endowment Foundation on the large gaps that exist in the picture of the factors that contribute to a child’s risk of exploitation and the problems this raises in directing time and resource effectively.

“I’m not aware of any reliable piece of research that can tell me: is a child who’s been excluded in primary school more at risk than a child who’s been arrested twice for knife possession aged 15?”

Jon Yates

We heard about the need for a specific emphasis on understanding children’s exposure to criminal exploitation and well-defined, child-centred and measurable outcomes to understand which interventions are most effective for specific groups of children. One witness noted that understanding outcomes for children, including the successful prosecutions of perpetrators, would help to reassure children, families and communities that they were being listened to:

“How many of those perpetrators are actually charged with a crime of modern slavery or exploitation? How many are convicted? We don’t know that journey from a crime being reported to the outcome in court, and this impacts young people because many of them believe that if they report then nothing happens. What’s the point of reporting and sharing?”

Iryna Pona

Finally, a number of witnesses used variations of the phrase ‘if it is predictable then it is preventable’, and we heard a perception that if only children could be correctly identified early enough, then their exploitation could be prevented. This is a laudable aim. However, the evidence also showed that, while the lack of information sharing is a critical issue, even more critical is the lack of ability to act and protect children once the risk of harm is identified; this is particularly difficult for local authorities where the risk of harm is serious.²²⁰

5.7 National policy and strategy

Throughout the Review we heard about the problems caused by a lack of leadership from central government. Participants told us there was a seeming lack of understanding of the criminal exploitation of children as an urgent and preventable crisis. We heard how collaborative intentions – locally and nationally – are undermined by divergent priorities across agencies, a lack of collective investment and no shared outcomes framework. There is no framework or guidance for local areas in how to develop local exploitation strategies and no system-wide analysis of expenditure, eligibility, prevention and investment.

Lack of national leadership

There was a unanimous view that too little national attention is given to children who are criminally exploited. Some disagreement existed about the reasons for that lack of attention. For some witnesses this was seen to be due to a lack of understanding either of the issue or the scale of the issue. In particular, there was a feeling that there had been a strong focus on county lines but not to the broader issue of exploitation, thereby limiting the nature of the response from government. That view was challenged specifically by other witnesses who thought it was very unlikely that national policymakers would not have a clear sense of the problem.

It was common for witnesses to contrast the response to criminal exploitation with that to child sexual exploitation. Though witnesses were clear that the response to child sexual exploitation has been far from perfect, there was a sense that, from 2015 onwards, there had at least been a focus on the issue driven by the central government, and that criminal exploitation had not been given the same level of priority.

Uncoordinated workstreams across government

Where there were differing views about the causes of a lack of leadership on the issue of criminal exploitation, there was clear agreement that, at a national level, the response was poorly coordinated across central government. For some witnesses it was clear that the Department for Education had the lead role to play given its safeguarding remit. Others highlighted the inevitable need for cross-government working and the barriers to that in the current approach.

Witnesses described the large number of workstreams across government that they thought were uncoordinated; are sometimes at odds with each other; and compete for resource, funding and time. In particular, they told us there was a lack of focus on exploiters, with punishment and restrictions too often falling on children instead of those abusing them. For some witnesses this was a structural issue that went beyond the specific challenge of criminally exploited children. We heard that the lack of clear responsibility for the safety and wellbeing of vulnerable children limited the scale and the stability of the response needed.

The view given by the Youth Endowment Fund was a common one:

‘At present if I was to ask across Whitehall and Westminster which is the government department responsible for vulnerable children, the truth is I can get an answer but it’s not a consistent answer. That strikes me as a serious problem.’

Jon Yates

This was regarded by some witnesses as fairly well-worn ground. A number cited the National Audit Office report in 2022 that looked at the government response to vulnerable adolescents and had had difficulty pinning down which department had overall responsibility for this policy area, noting that government does not know whether the money spent on adolescents actually helps the most vulnerable.²²¹

One specific reason given for that lack of consistency was the perceived impact of media attention on policy making, with witnesses pointing to small schemes initiated in response to moments of media interest. These initiatives had lacked coordination, with a large number of overlapping but unconnected schemes launched by government departments.

Witnesses also noted that the government response was skewed towards county lines to the extent that criminal exploitation and county lines was sometimes conflated in government strategy, and urged caution that the political and media attention on this area of harm did not eclipse other aspects of the criminal exploitation of children.

Tensions between policy approaches

Worse than a lack of coordination, some witnesses felt that departments were in direct conflict in their priorities and even in their policy making. One example given was the conflict between the push to treat exploited children as victims and respond accordingly with the adoption of zero-tolerance behaviour policies in some schools. For some witnesses that meant those schools were poorly placed to play a role in safeguarding those victims of exploitation.

Even within relatively narrow areas of policy, witnesses felt it was hard to coordinate between differing priorities. It was seen to be increasingly difficult to coordinate responses on criminal exploitation with other priorities relating to serious violence, youth justice and other competing priorities within local areas. Witnesses discussed and raised a very long list of different schemes and approaches that interacted with vulnerable children but that had different aims and did not seem to have a coherent approach.

Witnesses noted that criminal exploitation was not looked at in totality, as a distinctive area of policy with an overarching strategic overview that encompassed exploitation in all forms:

“There is a strategic need to look at exploitation in totality; there’s an operational need to look at them through slightly different lenses. The concern I have is we shift, dependent on what the crisis is, dependent on the public outcry there is, that we shift the resource because we have limited resource, into one area. I’ve seen that from the national scandals around CSE, then shifting some of that resource to criminal exploitation, and then seeking to shift it back. We have the national Hydrant team around CSE and I think we need to look strategically at exploitation as a whole. Operationally, we need to make sure we don’t just blend all this into one because there are different nuances that require different services for those children.”

Ian Critchley

Issues with cross-border working

A further complication for UK policy makers is the differing approach and legal systems across the UK. One clear area of weakness identified was lack of a shared strategy across the UK to respond to the challenge of children who were trafficked across the country and encountering different responses and systems according to their location.

Some witnesses pointed to specific differences and challenges between nations. The use of DoLs in England and Wales was regarded as a challenge by some witnesses working in Scotland. Scotland does not use DoLs, meaning there are practical and legal challenges in the case of cross-border placements. Similarly, Scottish witnesses sometimes felt that Scottish youth justice services were more likely to respond to exploitation through a safeguarding lens but were not confident that this would be mirrored in other parts of the UK.

Witnesses also described the different nature of issues both within and between nations, and a lack of UK-wide understanding of the importance of these to the national response; of particular note was the legacy of the Troubles and continued influence of paramilitary groups on exploitation in Northern Ireland.

Change is slow and piecemeal

Witnesses stated that reform was too slow, particularly in comparison with the speed with which exploitation had evolved and spread. We heard evidence on how the system was failing to respond quickly enough to the ways in which models of exploitation were evolving and innovating to take advantage of children. Rather than continually attempting to ‘tweak’ the system to cope with a set of immediate challenges, it was felt the system needed to be designed to encourage ongoing change and innovation so it was well placed to respond over time to the inevitable – but not always predictable – changes in the ways in which children are exploited.

“This means enabling local areas to approach innovation as a non-linear activity, where learning alongside communities and adapting to context is prioritised over ‘rolling out’ top-down prescriptive reform. It means that sector infrastructure (including inspection, regulation and funding) needs to be designed to explicitly enable - indeed, demand – collaboration and critical thinking.

Crucially, it means compassionate and well-informed cross-government policy making in deeply collaborative ways, with system-wide analysis of expenditure, eligibility, prevention and investment (as was the intention with Total Place, superseded by Whole Place Community Budgets – both initiatives were unfortunately disbanded).”

Research in Practice

Witnesses emphasised that there were positive signs of activity across the UK and pointed to the fact that this was a policy area that was still relatively new and where the policy response was in its infancy. That was seen as a positive by some who thought some good progress had been made across the four nations of the UK, particularly as compared with the international context.

Most – though not all – witnesses felt that the Violence Reduction Units around the country were doing good work while being hampered by the system around them. Evidence was given of emerging cross-governmental or cross-departmental groups that were starting to do that coordination at a national level, including the Child Protection Senior Officials Group led by the Departments of Health and Justice in Northern Ireland.²²²

Overall, however, the view was that some or all of the policy response made supporting children more complex, rather than less. In attempting to amend and repurpose the existing structures of child protection and criminal justice, the system of support around children had replicated that complexity. Witnesses noted that, while a certain amount of complexity is inevitable, what is required is a new system built with the explicit purpose of preventing the criminal exploitation of children, supporting its victims and sanctioning its perpetrators.





6. Conclusions: a preventable crisis

The criminal exploitation of children is a form of child abuse that exacts physical, psychological and sexual – sometimes fatal – harm on its victims.

“

Lastly, we need hope. I think that comes from facing the issues, building knowledge, and working out (by trial and error if need be) some of the answers to the question I pestered everyone with: what have you seen work?

Natalie, whose son Liam child was murdered in 2022

As demonstrated through the evidence submitted to the Review, this position is increasingly recognised by victims, practitioners and policy makers, with a growing understanding of exploitation tactics and business models used by criminal gangs and individuals. As outlined in early sections of this report, a range of research and reviews, legislative amendments and service restructuring has been undertaken over the past decade to tackle child exploitation, including several government programmes aimed at funding innovation and improvement.

Despite this, the crisis of exploitation and serious youth violence remains and is growing. The policy response is piecemeal, with continued tensions between criminal justice and safeguarding approaches. Progress is being made across the UK at a local level, in schools, safeguarding, family support, criminal justice and policing but it is too often unsupported by the underpinning legislative and policy framework and a joined-up approach from government.

Exploiters operating at a local postcode level are efficient at identifying, recruiting and exploiting vulnerable children, often through their peers. Where perpetrators of exploitation can be swift, adaptable, highly networked and well funded, the system response to exploitation is too often reactive, restricted and lacking in capacity. At every stage of a child's experience of exploitation, there are systemic barriers to a co-ordinated approach that is child- and family-centred.

The result is that too many children and families do not get the help they need. As a consequence, harm can be acute and long-lasting. It can include criminalisation, incarceration, drug addition, psychological trauma and brutal physical and sexual violence.

This is a hugely complex problem. In attempting to reconfigure the existing structures of child protection and criminal justice, the system of prevention and support around children has added to that complexity. As presented in this report, the Review has heard detailed evidence on the aspects of legislation, policy and practice that are not working effectively in supporting children. What is required is a new system built with the explicit purpose of tackling the criminal exploitation of children.

Our conclusions are listed below, with recommendations given in the next section.

1

A statutory definition of the criminal exploitation of children is essential.

For a number of years there have been calls for the UK government to adopt a statutory definition of the criminal exploitation of children as the solid foundation for policy, practice and legal change. The absence of such a definition contributes to the failure to protect and support children, with responses limited by the lack of a legal basis for services to intervene. A statutory definition is essential to the provision of a consistent response across all agencies; to prevent a postcode lottery across the four nations; and to improve identification of children and young people involved in this form of exploitation.

Exploitation is a distinct form of child abuse, requiring a specific approach; all agencies working with children must be clear on this and able to act accordingly to identify and safeguard children who are exploited. A lack of legal definition can contribute to children receiving a criminal justice response rather than a safeguarding response. This is in large part due to children being first identified through their criminal activity.

Multiple definitions operating across and within the police, children's social care, health and criminal justice result in agencies collecting different information in different ways, making a clear picture of the extent and scale of criminal exploitation impossible.

Any new definition should be clear, easily applicable and enable a local and national picture of exploitation to be built. It should help practitioners within services to understand the features of exploitation. It should not act as a barrier to children being seen as exploited. We have included our proposed wording in the Recommendations section of this report.

2

Existing legislation, policy and criminal processes are not fit for purpose.

Existing legislation, policy and criminal processes are not effective in identifying or protecting exploited children. The current child protection and legal frameworks were not designed to tackle extra-familial harm to children at such scale. This includes the Modern Slavery Act 2015, the Human Trafficking and Exploitation (Scotland) Act 2015 and the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.

The National Referral Mechanism (NRM) was not designed for such large volumes of cases of child exploitation and does not effectively offer protection to children who have been exploited, with delays of up to 18 months for a decision to be issued in some cases preventing the defence of modern slavery being used by children in court.

The process for referral and the decisions made by the Single Competent Authority in the Home Office is slow and lacks transparency or scrutiny, with key data about children referred into the NRM unavailable or unrecorded. The NRM process does not support children's ability to make a defence of exploitation in criminal proceedings. This can be due to mismatched timescales and the lack of qualification of the Single Competent Authority as an expert in exploitation. The range of first responders who can submit referrals to the NRM is narrow, excluding agencies and legal teams who work directly with exploited victims. Referrals to the NRM are inconsistent across the UK depending on the perception of first responders of what constitutes the criminal exploitation of children.

The focus of legal orders should be to target exploiters in the first instance. Depriving children of their liberty to protect them from others is not in accordance with UNCRC at its most basic level. A Deprivation of Liberty Order should never be used purely because there is no other suitable accommodation available.

In particular, the current approach is too lenient towards exploiters. There are very few prosecutions under the Modern Slavery Act, with an annual decline in prosecutions and convictions over the past five years.

3

Too many children experience a criminal justice response.

Too many exploited children experience a criminal justice response as the primary intervention, rather than child protection. In some cases, this is causing additional harm to children in ways that exacerbate and perpetuate their vulnerability. The aim of youth justice across the UK should be to prevent exploited children entering the criminal justice system, using diversion wherever possible.

The principle of the paramountcy of children's welfare, as outlined in the relevant Acts across the UK, is not reflected in legislation which places the burden of proof on a young person to demonstrate they have been the victim of exploitation.

4

The paucity of data on exploitation hampers efforts to identify, prevent and respond to it.

Children cannot be safeguarded from exploitation if we do not know where, how and to whom exploitation is happening across the country. A lack of national data sharing hinders our understanding of the scale and extent of exploitation, patterns of criminal activity, areas of priority and whether progress is being made.

For at-risk children to be accurately identified and receive appropriate support and intervention, information about a child's risk of exploitation must be visible to all relevant professionals across data systems and documentation. There should also be greater understanding around exploiters to ensure effective risk management for children and those supporting them. If we don't understand the nature, scale and severity of exploitation on children and communities we are less likely to be successful in our efforts to safeguard. There is limited linking of health, education, police and social care data on children within and between local authority areas, presenting a key barrier to safeguarding.

Shared data and learning at a regional and national level are frustrated by difficulties in data and information sharing, including IT systems that are incompatible, requirements to record data in different ways, and concerns about GDPR.

Central government lacks the requisite information and insight to understand whether the programmes it funds and the guidance it issues are well targeted to reducing harm to vulnerable children.

5

School is an essential protective factor.

The role of education providers is essential in early identification and support of children at risk of exploitation. This includes early years settings, alternative provision and further education in addition to mainstream primary and secondary schools.

School can be a clear protective factor in the lives of children. It can provide stability, consistency of care and the opportunity for wrap-around support. Poor attendance and school exclusion is a well-evidenced vulnerability for children who are exploited. A lack of training for education staff leads to schools feeling ill equipped in identifying and responding to exploitation.

There is high variability across the nations in the ability of schools to identify, support and safeguard children, including access to SEND support, exclusion policies and an inspection framework that prioritises academic performance.

The engagement of individual institutions with safeguarding plans for children varies considerably within and across local authority areas.

There are good arguments to be made for education becoming the fourth statutory safeguarding partner in England, though this would need to be accompanied by the necessary funding.

6

Local safeguarding arrangements are not always effective in supporting children at risk of exploitation.

Collaboration among agencies working with children is essential for ensuring children receive the best safeguarding and support to promote their wellbeing.

A gap in statutory guidance has led to wide variation across local authorities about whether children are placed on child protection plans if the risk of harm they face is outside the home.

7

Early intervention is hampered by short-term and ad hoc funding for services.

Early identification of children who are vulnerable to exploitation is essential but a decade of funding cuts to early help services, coupled with an increase in need, has lowered thresholds for support and restricted the ability of services to respond to children proactively. Too many chances to support children are missed before crisis hits.

The lack of consistency of funding – both for core services and for programmes that specifically tackle child exploitation – is a barrier to sustainable outcomes and prevents a focus on prevention or early intervention. Victims of exploitation may develop a deep mistrust of adults and authorities. Agencies must work to develop trusted relationships to encourage the child to engage with support. This takes time, persistence and flexibility, which current funding arrangements do not allow.

In addition to the benefit to children, investing in early intervention is well-evidenced in its value for money, and avoids the substantial additional costs to the public purse. These include crisis support, high-intensity care placements, A&E attendance, police time and costs to the youth justice system.

8

Serious, preventable harm to children is being caused by a lack of national exploitation strategy.

There is a lack of leadership or focus from central government on understanding criminal exploitation as an urgent and preventable crisis, despite the high number of children who are known or suspected to be victims of exploitation and the level of harm they experience. Collaborative intentions – locally and nationally – are undermined by divergent priorities across agencies, a lack of collective investment and no shared outcomes framework.

There are a large number of workstreams across government which are not coordinated; are sometimes at odds with each other; and compete for resource, funding and time. There is a lack of focus on exploiters, with punishment and restrictions too often falling on children.

Scotland's Serious Organised Crime Taskforce has created practitioner guidance aimed at early identification of individuals vulnerable to criminal exploitation or serious organised crime. Agencies associated to the taskforce are developing a national practice framework to enhance existing collaborative efforts, placing emphasis on best practice and appropriate application of existing policy and legislation.

Cultural and legal barriers exist across UK governments and agencies in relation to seeing criminal exploitation as a form of child abuse requiring a child protection approach. This includes the public perception of children involved in criminal exploitation.



7. Recommendations

The Review has heard detailed evidence on the many aspects of legislation, policy and practice that are not working effectively in supporting children and families. Witnesses suggested nearly 150 recommendations for improvements, including amendments to existing policy, guidance, funding arrangements, social care practice and legislation.

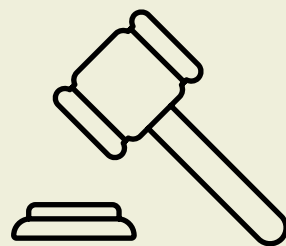
Though we have no doubt that these changes would constitute improvements to current provision, even in combination they would not tackle the fundamental problem that the system as it stands is not fit for purpose; indeed, much of the current framework was never designed to be applied in cases of child exploitation. A new system designed with the explicit purpose of tackling the criminal exploitation of children is required.

We recommend this is built on the following three pillars:

- 1** A single, cohesive legal code designed to tackle the criminal exploitation of children
- 2** Coordinated policy and practice at a local and national level
- 3** Investment, research and whole-system learning

These recommendations are set out in detail below.

1 A single, cohesive legal code for children exploited into criminal activity



1.1 The criminal exploitation of children should be given a statutory definition within UK law.

We recommend the following definition, based on the existing description in common usage across UK government guidance and in line with the definition of child sexual exploitation published in 2016:

The criminal exploitation of children occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. The victim may have been criminally exploited even if the activity appears consensual.

This definition should be used across all government departments, guidance and policy when referring to exploitation.

In addition, the Department for Education should consult with children and families on comprehensive guidance for England to sit alongside the definition to help professionals identify and support children at risk of exploitation. This should correspond to the All Wales Safeguarding Procedures and existing Scottish guidance, and should make clear the relationship between the criminal and sexual exploitation of children, county lines, modern slavery and human trafficking and provide an overview of relevant legislation and strategies in place across the UK, including approaches such as the Tackling Organised Exploitation Programme (TOEX). Supporting guidance should also be clear that exploitation is a form of child abuse that can occur online or in person.

1.2 Specific legislation should be drawn up for England, Wales, Scotland and Northern Ireland covering child abuse through exploitation.

Using the new definition as its basis, a comprehensive legal code should be drawn up for England, Wales, Scotland and Northern Ireland covering child abuse through exploitation.

This must provide:

- Clarity that exploitation is a form of child abuse.
- A new criminal offence of criminally exploiting children.
- Legal protections for children who have committed criminal acts while exploited, including defences in criminal proceedings.
- Clarity that exploiting another child is, in itself, an act that children can be exploited to commit.

In line with the Scottish legal approach through the Lord Advocate's Instructions – as part of the Human Trafficking and Exploitation (Scotland) Act 2015 – this new legislation should state for all nations that there should be a presumption against the prosecution of children who are the victims of exploitation. There should be no 'reasonable persons' test included in a defence of exploitation, and no forms of crime excluded.

In combination with the statutory definition, this should confer a new status on a child as being a victim of exploitation. This may be in addition to being a victim of trafficking or modern slavery.

1.3 The legal rights of the most vulnerable children must be safeguarded.

The UK government should fully incorporate the UNCRC into UK legislation to bring this in line with Welsh, Scottish and Northern Irish legislation, as recommended by the UN Committee on the rights of children in relation to legal reform.

The Independent Child Trafficking Guardian service should be rolled out across England and Wales to provide specialist support through care and legal proceedings to all children who have been identified as trafficked.

Legislation relating to asylum seeking children, including the Nationality and Borders Act and the Illegal Migration Act, should be amended to ensure that children are not disqualified from protection as victims of exploitation.

The evaluation of the National Referral Mechanism devolved decision making pilots should be published as soon as possible, with the approach, if effective, rolled out swiftly to all safeguarding partnerships in the UK to reduce the period during which only some children are receiving a more effective service.

1.4 New powers should be given to the police and criminal justice system to identify and sanction exploiters.

The new legal code should create a criminal offence of criminally exploiting children.

New legal orders specific to exploitation should be introduced that enable police forces to disrupt and prevent exploitation by targeting perpetrators. These may include a Child Exploitation Injunction Order, akin to the Domestic Violence Prevention Order, with a breach constituting a criminal offence.

2 Coordinated policy and practice at a local and national level



2.1 The UK government should take the lead in developing a national strategy for preventing the criminal exploitation of children.

National leadership and focus is essential to create long-term, multi-agency strategy and policy coherence across the UK. The threat of exploitation and organised crime should be given a comparable level of priority and focus as child sexual exploitation has received from previous governments, with a national action plan led by the prime minister. Coordinate efforts across all relevant government departments and include COBRA meetings where necessary.

The plan should bring together the work of the Scottish government and the Welsh and Northern Irish Assemblies, paying close attention to issues of cross-border working and divergent legislation and policy in the four nations. It should include a UK-wide understanding of the business and operating models of organised crime and its variations across different areas of the country, to better identify networks of exploitation and target disruption efforts.

2.2 Exploitation must be recognised as a distinct category of child protection.

Exploitation should be placed on a statutory footing as a fifth category of child protection alongside physical abuse, sexual abuse, emotional abuse and neglect. This should be supported by a new child protection pathway for risk outside the home (ROTH).

The national and local approach to risk outside the home should be underpinned by:

- A joint strategy between the Department for Education, Ministry of Justice, Home Office and Department of Health and Social Care to prevent and respond to risk outside the home, including exploitation and serious violence.
- A joint practice framework between child protection services, adults' services, police forces, health and local agencies that responds to children at risk of exploitation, based on the best available evidence.

- Local outcomes frameworks that support and value contextual interventions, measuring the impact they have on communities as well as individual children.
- A Gold Standard pathway for children at risk of exploitation to provide consistency of practice, that details available policy and legislation, the highest standards of safeguarding, multi-agency working and information sharing.
- UK-wide training materials developed on the criminal exploitation of children and made part of professional development across the children's workforce.

2.3 A welfare-first approach in the management of offences committed by exploited children.

Local safeguarding partners should work to a joint, welfare-first approach in the management of offences committed by children. A statutory safeguarding response must be triggered as soon as exploitation is suspected by professionals, including for children 'mapped' to an organised crime group, with clear information sharing protocols. A safeguarding referral must be made by police as soon as possible when any child is arrested, for any reason, whether or not they are subsequently charged with an offence.

The Crown Prosecution Service, Crown Office Procurator Fiscal Service and the Home Office should consult on adding a safeguarding referral outcome to the Crime Outcomes Framework to encourage police officers to refer vulnerable children to children's social care. Every police force should have a senior officer holding responsibility for the local strategy on child exploitation.

2.4 Local safeguarding arrangements must be robust and well-funded.

The Department for Education should commit to a timetable for making education a fourth statutory safeguarding partner in England, with sufficient funding, support and accountability to make this effective, as indicated in Working Together 2023. This should take as inclusive a view as possible of education, encompassing early years providers, schools, alternative provision, higher education and further education colleges.

The relevant child safeguarding guidance for England (Working Together to Safeguard Children), Wales (Working Together to Safeguard People), Scotland (Getting it Right for Every Child) and Northern Ireland (Cooperating to safeguard children and young people in Northern Ireland) should be revised in 2024 to ensure that:

- There are clear, established escalation processes within local authorities to hold partners to account if they are not acting in accordance with a child protection plan or risk outside the home plan. Partnership Chairs (in England and Wales), Committee Chairs (Scotland) or the Board Chair (Northern Ireland) should hold responsibility for this process and be required to inform the relevant regulators if partners are not acting in the best interests of a child.

- There is consistency and clarity on process and expectations for tackling exploitation, including what a welfare or safeguarding response comprises. This should be supported by explicit design of inspection, regulation and funding to enable collaboration.
- There is an identified single point of contact for education within every local authority in the UK with a clear line of safeguarding responsibility over all local education institutions, including academies where applicable, and accountability to government.

The Department for Education, Home Office and Department of Health and Social Care should jointly consider how the functions of Local Safeguarding Partnerships, Child Protection Committees, Health and Wellbeing Boards, Adult Safeguarding Boards, and Community Safety Partnerships could be rationalised, and the bodies merged with consolidated duties, powers, funding and accountability.

3 Investment, research and whole-system learning



3.1 Investment and funding for early intervention and prevention services for exploited children must be increased and ring-fenced.

All home nation governments must expand and invest in specialist services for victims of child sexual exploitation and criminal exploitation.

The government should introduce a legal duty on local authorities in England to provide early help. That should be backed by ring-fenced funding and a specific requirement to provide specialist services to prevent children from being criminally exploited.

Funding for specialist services should be consistent, long term and allocated to reflect local need and the best evidence of what works. This should include, as an urgent priority, fully funding access to SEND and CAMHS assessment and support, both within and outside school settings.

The Ministry of Justice should review the effectiveness of the diversion process in cases of exploitation, including extending the 12-week diversion timescale and funding new packages of support for children following a completed diversion to protect them from further exploitation.

3.2 Data and information collection must be standardised to allow for identification of children at risk and disruption of perpetrators.

The Department for Education should move quickly to introduce the use of a consistent unique identifier for children, rolled out across education, health, police and child protection services.

Data and information collection must be standardised across local agencies to allow for identification of children at risk and disruption of perpetrators, with a new cross-border protocol for sharing data between the four nations.

A new shared definition of the criminal exploitation of children should underpin consistent data collection and reporting on the scale and nature of the issue.

3.3 Evidence and learning from the four nations must be brought together to understand the full picture of exploitation and apply what works.

Insufficient national and local data on the nature and prevalence of exploitation, coupled with a lack of whole-system learning, is a barrier to effective practice and policy responsiveness.

The UK government must work closely with the relevant What Works Centres and inspectorates to apply the evidence base to policy and funding decisions. This should include research to better understand the key points or transitions along a child's journey through exploitation where there is an opportunity to support, intervene or change, and what best practice looks like at those points.

Working Together to Safeguard Children' should be amended in 2024 to state that rapid reviews should be shared with Ofsted and other inspectorates as a matter of course, so that the inspectorates are part of the learning loop and can take account of learning in scheduling their inspection activity, in addition to scrutinising whether learning has been implemented.

Learning from pilots that are at or near completion should be made available to practitioners and adopted into guidance as soon as possible; this includes the Alternative Provision Specialist Taskforces, the devolved decision-making pilot for child victims of modern slavery and the risk outside the home pathway.

The UK government should develop a sophisticated UK-wide understanding of the business and operating model of organised crime and its variations across different areas of the country, to better identify networks of exploitation and target disruption efforts.

Enhanced training and support, pre- and post-qualification, should be mandatory for all professionals working with children, so they have the knowledge and confidence they need to better protect children by identifying signs of child sexual abuse, sexual exploitation and criminal exploitation, and responding appropriately.

Appendix:

List of witnesses and contributors

Evidence given in person to the Review, 21–24 November 2023 in London

Amanda*, parent

C*, Action for Children mentor

Paul Carberry, Chief Executive, Action for Children

Ian Critchley QPM, National Police Chiefs' Council Lead for Child Protection, Investigation and Abuse

Jahnine Davis, Director, Listen Up and Member of the Child Safeguarding Practice Review Panel

Dr James Dunn, Chair of Cardiff Violence Prevention Board and emergency medicine consultant, University Hospital of Wales

Laura Durán, Head of Policy, Advocacy and Research, ECPAT UK

Jess Edwards, Senior Policy Advisor for Childhood Harms, Barnardo's

Detective Superintendent Andrew Farrell, Serious and Organised Crime Lead, National Police Chiefs' Council, SOC portfolio office

Professor Carlene Firmin MBE, Durham University

Sharon Glasgow, Protecting Children Policy and Practice Advisor, Social Work Scotland

H, Action for Children mentor*

Amanda Hatton, Executive Director of Education and Children's Services, City of Edinburgh Council

Steven Hume, Director, Northumbria Violence Reduction Unit

Neil Hunter, Principal Reporter / Chief Executive, Scottish Children's Reporter Administration (SCRA)

Mo Jannah, broadcaster and former Action for Children mentor

Bami Jolaoso, Senior Innovative Practice Officer, Centre for Justice Innovation

Kudakwashe Kurashwa, Team Manager, Hillingdon Adolescents Team, London Borough of Hillingdon

Shauneen Lambe, Child Law Network and Chair, Just for Kids Law

Cllr Ash Lister, Cabinet Member for Social Services, Cardiff Council

Anne Longfield CBE, Executive Chair of the Centre For Young Lives and former Children's Commissioner for England

Sharon Maciver, National Lead for Child Criminal Exploitation, Action for Children

Donna McEwan, Children and Young People's Centre for Justice, Strathclyde University

DSU Carron McKellar, Detective Superintendent for Child Protection, Police Scotland

Abbee McLatchie, Director of Youth Work at National Youth Agency

Dr Jon Needham, National Director of Safeguarding and Mental Health, Oasis Community Learning

P, Action for Children mentor

His Honour Judge Steven Parker, Designated Family Judge, Cheshire and Merseyside

Lisa Pascoe, Deputy Director, Regulation and Social Care Policy, Ofsted

Lib Peck, Director, London Violence Reduction Unit

Alison Penman, Senior Manager, Children and Families Social Work in Dumfries and Galloway and Vice Chair Social Work Scotland Child Protection Sub Group

Iryna Pona, Head of Youth Research, Policy and Evaluation, The Children's Society

Jo Procter, Head of Service, Cambridge & Peterborough Safeguarding Partnership Boards

R, Action for Children mentor*

Aika Stephenson, Co-Founder and Legal Director, Just For Kids Law

DCI Mal Stratton, Northumbria Police

DCS Kate Thacker, Programme Director, Tackling Organised Exploitation Programme

Karina Wane-Henry, Director of Strategy and Operations, London Violence Reduction Unit

Gemma Woolfe, Office of the South Wales Police and Crime Commissioner and Wales Violence Prevention Unit

Jon Yates, Executive Director, Youth Endowment Fund

Video evidence heard at the Review

Cristi*, parent

Vicky*, parent

Yasmin*, parent

Ben, Sy, Danny, Michael, Tomas, Femi and Kyle, young people with experience of exploitation*

Evidence submitted in writing during November and December 2023

Cambridgeshire and Peterborough Safeguarding Partnership Board

Cardiff Council

Children's Social Care Research and Development Centre (CASCADE), Cardiff University

The Centre for Social Justice

Child Law Network

Children and Young People's Centre for Justice, University of Strathclyde

Contextual Safeguarding Network

Crown Office and Procurator Fiscal Service, Scotland

Superintendent Martin Earl, Merseyside Police

Hillingdon Adolescents Team, London Borough of Hillingdon

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)

Justice and Care

Natalie*, parent

Northumbria Violence Reduction Unit

Nesha Dixon, Abertay University, Dundee

Newcastle City Council

Northern Ireland Departments of Justice and Health

Northern Ireland Executive Programme on Paramilitarism & Organised Crime

Office for Standards in Education, Children's Services and Skills (Ofsted)

Office of the Children's Commissioner for England

Office of the Children and Young People's Commissioner Scotland

Office of the Northern Ireland Commissioner for Children and Young People

Research in Practice

Social Work Scotland

Aidan Thompson, Honorary Senior Research Fellow, Jubilee Centre for Character and Virtues, University of Birmingham

*names have been changed

We would like to thank the Office of the Children's Commissioner for Wales; Professor Michelle Lefevre, University of Sussex; and Graham McNulty, former Deputy Assistant Commissioner, Metropolitan Police for their additional input.

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