



County Lines and Looked After Children

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Contents

Foreword by the Children’s Commissioner Anne Longfield	
Executive summary	6
2. County lines — our research in context	10
3. County lines in focus: Merseyside and North Wales	23
4. Out of sight, out of mind?	38
5. Borderless safeguarding - a distance left to run	50
6. County lines and Covid - a natural experiment	60
7. Conclusions and recommendations	70
Bibliography	75
Appendix A	76
Appendix B	77

Foreword by Anne Longfield OBE, Children's Commissioner for England

There has been a tendency in the past to think of 'gang members' as highly dangerous gangsters – aggressive, intimidating, violent, brash and confident – and of course many are. But there are also those that gang leaders involve in their criminal activities – the runners and go-betweens, who sadly over recent years are often children. They are groomed and exploited as 'easy' targets, commodities who can be discarded when they have served their purpose, something we see in the vicious and ruthless world of county lines.

When you look at the children involved in county lines, so often you see the child – small, scared, lost kids who have become caught up in large-scale criminal enterprises which use sophisticated techniques to manipulate and exploit the most vulnerable. So often these children are in the care system.

The case histories of the young people killed in violence associated with the drugs trade tell familiar tales of children who fell through gaps in the services that are supposed to be there to protect them. They have all the risk factors you can imagine, but still end up without the protection they need. Tragically some then become another newspaper headline, often because nobody thought it was their job to keep them safe.

This report shines a light on the devastating impact that missing out on that help can have on the life of a very vulnerable child. It also highlights what can happen when the children's social care system fails to act as the parent it has a statutory duty to be when a child goes into care.

While there are thousands of children who thrive and live happy and stable lives in care, we know there is a growing number of children who are entering the system in their teens who are already ripe for the picking by the criminals who want to exploit them. Often, they have been placed miles from home, moved from pillar to post, far from people who know them well and can notice the dangers. Sometimes they are falling out of the school system because they are excluded, after moving from school to school, never settling or being given a chance to build new friendships and get on with their studies. Sometimes, they will be placed in unregulated accommodation with little support – living in risky environments alongside vulnerable adults who are involved in crime.

The report makes a strong case for better data sharing locally and nationally, and a more coordinated national strategic response. While there has been some progress over the last two years, it is too slow and I am still not convinced we have anything like the joined-up approach across government departments that we need to tackle these increasingly sophisticated criminal networks. The Serious Violence Taskforce which met under the previous Prime Minister has been disbanded and it is unclear what has replaced it. At the beginning of this year, the Prime Minister pledged to 'cut the head off the snake' of county lines, setting up a Cabinet Office group that he would lead. But little more information has followed since.

The report also strengthens the argument for the Government's promised review of children's social care to look at the way some children in the care of the state are ending up as runners of county lines, not only ruining their childhood but picking up scars that last into adulthood. The number of adults in prison or on the streets who grew up in care is particularly shameful.

Unfortunately, the current system of children's social care has just not been able to keep up with the changing cohort of children entering it and it is rapidly running out of money. The post-Covid pressures will increase the strain, and constantly having to divert spending away from prevention and family support programmes and into high-cost interventions is a strategy that is not working.

The last few months have really brought home the vulnerabilities that thousands of children in England live with, pushing up the political agenda the need for greater support for the most vulnerable kids. This report is another timely reminder to those who have the power to act, of the consequences of failing to do so.

Executive summary

Since the National Crime Agency (NCA) published their first intelligence assessment in 2015, county lines have gone from being a little known phenomenon discussed by a small community of professionals to front page news in national newspapers, plot points in popular soap operas and the subject of documentaries and a motion picture. However, due to the lack of published data on the nature and scale of county lines exploitation, it remains an issue that generates heat but very little light.

Local authorities and police forces, with a few notable exceptions, do not publish data on children exploited in county lines, neither is this data routinely collected by central government departments. It is often unsafe for children and young people who have been involved in county lines to tell their stories, even anonymously, so first person accounts are relatively rare. County lines exploitation therefore presents us with a 'data desert', and the lack of published evidence has inhibited the ability of professionals to understand and respond to the evolving county lines threat.

Looked after children (LAC), children who have been taken into local authority care as a statutory intervention to improve their welfare, are widely recognised as being at disproportionate risk of being groomed and exploited in county lines. As their 'corporate parents', the agencies of the state are collectively responsible for the welfare of these children. Yet as these children are moved into accommodation often at a great distance from their home area, sometimes in unregulated settings, their vulnerability to criminal exploitation increases.

Maps plotting known county lines show a multiplicity of lines extending from urban bases to coastal towns and market towns all over the county. These maps echo the distribution of looked after children from urban local authorities, sent to children's homes and unregulated accommodation often hundreds of miles from home. The relationship between the movement of vulnerable adolescents around the country in care placements and the spread of county lines is therefore a matter of significant interest.

The county lines operating model is not uniform or static — it evolves in response to police tactics and local safeguarding practises. The 'traditional' model of county lines involved gangs grooming and exploiting looked after children from care settings in urban areas to go missing and transport and sell class A drugs in county bases. In many areas, this is gradually being replaced by a new 'local franchise' model of county lines, putting the growing numbers of looked after children who are placed at distance from their home area or in unregistered, unregulated settings, at greater risk.

Key findings:

Looked after children are disproportionately represented in county lines networks — but they are not being systematically identified by police or local authorities

- Data on children reported missing shows that children placed in residential care homes and unregulated settings are at a higher risk of going missing. In North Wales, 31% of missing incidents in the last two years were reported from care and in Merseyside, 41% of incidents (and 18% of children) were reported missing from residential care and unregulated settings. They were also more likely to go missing on numerous occasions.
- However, the police are not consistently using county lines and CCE flags to identify heightened risk leading to a gap between data and operational understanding. For example, existing CCE and CSE flags are implausibly gendered and under-represent the number of young women and girls suffering CCE in addition to CSE, as well as the number of young men flagged as victims of CCE who suffer CSE.
- The inconsistent identification and recording of CCE and CSE provides local police forces and local authorities with a huge barrier to managing risk, especially across borders, and a victim-focused and data-driven approach is required.

A growing number of looked after children are placed in care settings which do not protect them from criminal exploitation

- The number of children taken into local authority care has increased in recent years. Much of this increase is accounted for by vulnerable adolescents, many of whom have come into care because of existing extra-familial risks.
- When looked after children are placed in settings at distance from their home area, or in unregulated settings, their vulnerability to exploitation is amplified.
- The 'market' for children's social care placements is broken. There is a shortage of suitable placements close to home for vulnerable adolescents, meaning they are often placed in settings perhaps hundreds of miles from home, and in extremis in unregistered, unregulated settings.
- There is also an acute shortage of therapeutic and specialist placements for children known to have been victims of criminal exploitation leaving them at risk of re-exploitation.

Inadequate information sharing between agencies leads to a poor safeguarding response

- Local authorities and police forces lack a common set of vulnerability assessment tools and CCE flags. With no centrally directed approach there is currently an inconsistent patchwork of local responses.
- This means that agencies are not able to share critically important information about vulnerable children in a timely manner across borders.
- The lack of robust national data on children affected by CCE has also prevented the research community and statutory agencies from understanding the patterns of

exploitation, designing interventions at national and local levels, and assessing the outcomes of current interventions.

- The 'National Referral Mechanism' (NRM) enables agencies and localities to avoid taking responsibility for safeguarding exploited children by placing the decision with the Home Office, who will have little knowledge of the context and take on average 452 days to reach a decision.

The county lines operating model has proven to be highly adaptable

- As the gangs and OCGs who operate county lines change their operating models in response to police tactics and local safeguarding practices, we have found evidence of an emergent 'local franchise model'.
- Grooming and exploitation is increasingly taking place in the 'county bases' — the point of sale for county lines, rather than in the 'home bases', the urban hinterlands of these gangs and OCGs.
- Adaptations piloted by gangs during the first Covid-19 lockdown suggest that the most successful operators of county lines are moving towards new models of exploitation which will pose huge challenges to police forces in county dealing bases.

Principles for reform

Our research points us towards three broad principles which should guide the Government's response to tackling county lines as it affects all children and young people.

- **Define the problem.** There is currently no legal definition of child criminal exploitation (CCE) or county lines. A new legal framework is required to form the basis for the tools agencies use as part of a new national strategy.
- **A national strategic response.** In order to safeguard looked after children from exploitation in county lines networks, an interdepartmental national strategy is required which manages vulnerabilities between local authorities and the police and across borders.
- **A joined up focus on prevention across government.** The national leadership in tackling county lines remains with the Home Office. As a result, the emphasis is heavily on enforcement, as the levers necessary to develop a preventative safeguarding response sit within other government departments, particularly the Department for Education. This must change.

Key recommendations

1. **A legal definition of CCE.** The Government must legislate to create a statutory definition of CCE and county lines as the basis of a new national strategy.
2. **A new national strategy to tackle CCE.** There is an acute need for an interdepartmental strategy jointly owned by the Home Office, the MoJ, the DfE and the DoH to balance the current emphasis on enforcement with a safeguarding approach.
3. **Fix the broken care 'market'.** The forthcoming Care Review must consider the

exploitation of looked after children and support local authorities to create suitable placements for vulnerable adolescents near to their home area.

- 4. Contextual safeguarding must guide distant placements.** When local authorities place children in care homes 'out of area' they should conduct thorough and continuous risk assessments prior to placements including the police in this process.
- 5. End the use of 'unregulated care homes' for looked after children.** The government must urgently implement the recommendations of their review of the use of unregulated care settings, and go further, requiring that local authorities seek ministerial permission to place a looked after child in any unregulated accommodation.
- 6. Reform the National Referral Mechanism for under 18s.** Local authorities in the dealing bases of county lines should assume responsibility from the Home Office as the 'competent authority' for NRM referrals for under 18s so they take responsibility for trafficking and slavery in their area.

Introduction

The purpose of this report is to critically examine the system response to the exploitation of looked after children in county lines drugs networks and to make recommendations which will address failures within the system. The research focuses on one of the most vulnerable groups of children in the country – looked after children. Nonetheless, our findings also shine a light on systemic failures as they affect all children, regardless of their social care status.

During our research, many interviewees emphasised the adaptability of the county lines model: how county lines evolved over time in response to police tactics and changing safeguarding practices, and how technology and changing demand for drugs might precipitate further changes in patterns of exploitation.

Conducting this research during Covid-19, a period in which strict public regulations were introduced, therefore presented us with the unexpected opportunity to study how the gangs and OCGs who operate county lines would react to changes in their operating model. This ‘natural experiment’ provides a new perspective on how the more successful adaptations to lockdown might shape patterns of exploitation post-Covid, so that law enforcement and local authorities can adapt their methods in anticipation of those changes.

We have interviewed a great number of people and have received valuable support from a range of organisations in conducting this research, for which we are extremely grateful. A full list is available in Appendix A, but we would like to offer particular thanks to Tom Silva of the Hadley Trust, Evan Jones and Junior Smart of the St. Giles Trust, Dez Holmes of Research in Practise, Duncan Evans of the National County Lines Co-ordination Centre, Megan Hatton of the Rescue Response service, Mandy Hanson from the Office of the Police and Crime Commissioner for North Wales, and Arfon Jones.

2. County lines – our research in context

In this chapter, we explore the ways in which the county lines model relies on the exploitation of vulnerable adults and children. Though the data is imperfect, direct and proxy measures suggest that county lines exploitation is becoming more common. The county lines business model is constantly adapting, and there is some sign that exploiters are targeting different groups; however, they continue to capitalise on the same motivations and fears among teenage drug runners.

Since 2015, government agencies, support services and practitioners have recognised that looked after children are at particular risk of exploitation in county lines drugs networks. This is partly due to the impact of traumatic childhood experiences, which can leave children with a desire for forms of belonging and approval, even when they are harmful in their nature. However, it is also because care settings – and the broader children’s social care system – struggle to effectively protect vulnerable adolescents. Many children’s homes, and many social workers, proactively support and safeguard the children who they are responsible for. However, trends in the care system mean that teenagers are now more likely to come into care, and more likely to live in settings without consistent adult oversight.

The existing evidence base on county lines exploitation relies mostly on small-scale data from intervention programmes. This report instead uses quantitative data and expert interviews from two police force areas, an ‘exporting’ and an ‘importing’ force, to measure and explain the problem. Through these local deep dives, this project aims to develop a more comprehensive understanding of the exploitation of children in care – and, by extension, the county lines exploitation of vulnerable children more broadly.

County lines rely on the exploitation of vulnerable adults and children

‘County lines’ describe a drug market structure where Class A drugs – usually crack cocaine and heroin – are transported across areas and sold through a dedicated phone line. The typical exporting area is a city, and the typical importing area is a deprived coastal town. Users place orders via the phone or ‘deal’ line, which is usually controlled by a third party.¹ Since the National Crime Agency’s first county lines threat assessment in 2015, it has been a key policy concern across government departments. County lines exploitation features heavily in the Home Office’s Serious Violence Strategy.²

¹ National Crime Agency (2018), *County Lines Drug Supply, Vulnerability and Harm*; National Crime Agency (2017), *County Lines Violence, Exploitation and Drug Supply*.

² National Crime Agency (2015), *County Lines, Gangs, and Safeguarding*; HM Government (2016), *Ending gang violence and exploitation*. This does not mean that the county lines model is new: see Wroe, Lauren (2019), *Contextual Safeguarding and ‘County Lines’*.

Defining county lines and child criminal exploitation: the Serious Violence Strategy (Home Office, 2018)³

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

London, the West Midlands and Merseyside are the three most significant exporting areas for county lines.⁴ Merseyside is hugely overrepresented in the market: it has less than a sixth of London’s population, but is responsible for around half as many deal lines. Liverpool is established as a historically significant hub for importing and distributing illegal drugs, with links via the Liverpool docks to Amsterdam, itself a European hub for importing and exporting illegal drugs. Highly organised and professionalised OCGs are based in the region.⁵

For the past five years, the National Crime Agency has asked police forces to submit returns on county lines activity in their area. These returns show that county lines affect nearly every police force, bringing exploitation with them. There are two main forms of exploitation: ‘cuckooing’, where the property of a vulnerable customer is taken over and used as a base, and the grooming of teenage drug runners. The NCA returns show that vulnerable adults have been exploited in three-quarters of the forces which reported county lines activity, and children in 65%.⁶

Proxy measures for exploitation have been increasing

There is indirect evidence that county lines exploitation is on the rise, though it is hard to be sure that the data represents genuine change rather than greater awareness and detection. For example, drug offence data suggests that teenagers have been increasingly drawn into the drug market over the past decade.

³ Home Office (2018), *Serious Violence Strategy*.

⁴ National Crime Agency (2018), *County Lines Drug Supply, Vulnerability and Harm*.

⁵

<https://www.theguardian.com/world/2020/jul/11/liverpool-gangs-dominate-gun-and-drugs-trade-outside-london>

⁶ National Crime Agency (2017), *County Lines Violence, Exploitation & Drug Supply*.

- Between 2008 and 2018, the police recorded a sharp increase in Class A drug offences among young people, including offences related to crack cocaine (up by 54%) and heroin (up by 46%).⁷
- Among fourteen- and fifteen-year-olds, convictions for possession with intent to supply almost doubled between 2012/13 and 2016/17.⁸ This is despite a broader decline in the number of children cautioned or convicted for drug offences.⁹

Meanwhile, the National Referral Mechanism (NRM) — a modern slavery referral system originally designed for adult victims of trafficking — has become dominated by reports of child labour exploitation and child criminal exploitation.

- In 2015, the UK was the third most common country of origin for children referred to the NRM, behind Vietnam and Albania.
- The vast majority (83%) of the British children referred were potential victims of sexual exploitation, with the other referrals evenly split between labour and ‘unknown’ exploitation.¹⁰
- By the end of 2018, 70% of the British children referred to the NRM were potential victims of labour exploitation — the category then used for county lines exploitation. The UK had become the most common country of origin for child referrals.¹¹

When the NRM introduced a new ‘criminal exploitation’ category in the last quarter of 2019, this immediately made up nearly half of all child referrals. According to the National Crime Agency, ‘[e]xploitation in county lines drugs supply remains the most frequently identified form of coerced criminality, with children representing the vast majority of victims’.¹² In the most recent NRM data, British children were overwhelmingly referred because of concerns about criminal exploitation (see Figure 1).¹³

⁷ Crest Advisory (2020), *What is driving serious violence: drugs*.

⁸ PWITS convictions also increased by 41% for sixteen year olds, by 46% for seventeen year olds and by 57% for eighteen year olds: Volteface (2019), *Making the Grade: School prevention, identification and responses to drug-related harm*.

⁹ Crest Advisory (2019), *Examining the youth justice system: What drove the falls in first time entrants and custody, and what should we do as a result?*

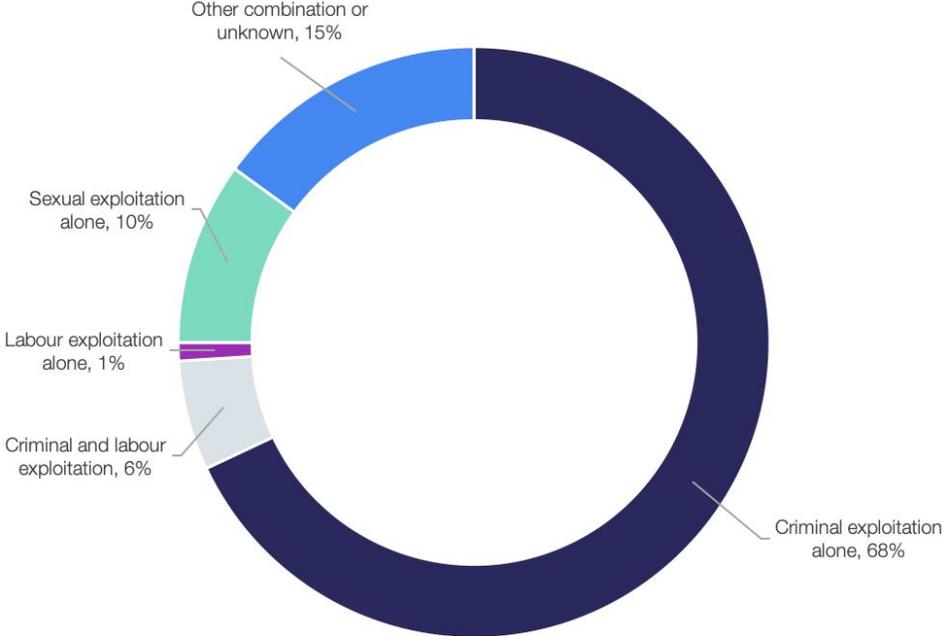
¹⁰ National Crime Agency (2015), *National Referral Mechanism Statistics — End of Year Summary*.

¹¹ National Crime Agency (2018), *National Referral Mechanism Statistics — End of Year Summary*. We have added other categories which included the label ‘British’, which presumably describe children with dual citizenship, to the ‘British’ category in the data. Though children who do not have British citizenship may also be exploited through county lines, including other nationality groups would blur the line between international trafficking and county lines exploitation within the UK.

¹² National Crime Agency (2020), *National Strategic Assessment of Serious and Organised Crime*, p. 24; <https://www.theguardian.com/world/2020/mar/26/uk-police-record-51-rise-in-modern-slavery-offences-in-a-year>; Home Office (2019), *National Referral Mechanism Statistics*.

¹³ Home Office (2020) *National Referral Mechanism Statistics UK, Quarter 1 2020: January to March*. Table 6.

Figure 1. Exploitation type for British minors referred to the NRM, January to March 2020



Despite some constants, the county lines model has changed since 2015 and continues to adapt

Some aspects of county lines exploitation have remained broadly stable since 2015. In most cases, according to both the published literature and our interviews, a fifteen to seventeen-year-old boy is recruited through a mixture of grooming and intimidation. They may be lured in with gifts of money or drugs, or by the promise of attention, belonging and status. After this, they are coerced through threatened or actual violence (against the children themselves or against their family members), sexual abuse and shaming, and/or ‘debt bondage’ (where they are forced to repay the cost of gifts from exploiters).¹⁴

¹⁴ Catch-22 (2015), *Running the Risks: the links between gang involvement and young people going missing*; National Crime Agency (2016), *County Lines Gang Violence, Exploitation and Drug Supply*; The Children’s Society (2017), *Criminal exploitation and County Lines: A toolkit for working with children and young people*; Home Office (2018), *Criminal Exploitation of children and vulnerable adults: County Lines guidance*; The Children’s Society (2019), *Counting Lives: Responding to children who are criminally exploited*; <https://www.theguardian.com/uk-news/2019/sep/15/airbnb-and-a-free-lunch-how-county-lines-drug-gangs-lure-teenagers>.

County lines exploitation has always been fuelled by a lack of legitimate employment opportunities, and by media-driven expectations about wealth, success and material consumption.¹⁵ In their doctoral theses on deviant street groups, drug dealing and county lines exploitation in Merseyside, Dr Grace Robinson and Dr Robert Hesketh suggest that it is about what they call ‘deviant entrepreneurship’.¹⁶ Hesketh, who coined the term, describes it as:

“Alternative employment (grafting) through drug dealing ... as an attempt to counter both limited opportunities to earn a legitimate wage and masculinity crisis, factors that can be observed within both neighbourhood and individual risk.”¹⁷

This means that unless young people are presented with realistic alternatives to county lines — a legitimate job, a future which they believe in — they may see no alternative. One of our interviewees, a teenage boy who had been involved in county lines, told us that *“everything is about money”*: as a result, young people whose families had little to live on were most likely to be drawn in.

County lines exploitation still rests on drug debts, grooming and coercion. Beyond these constants, however, the model has proved highly adaptable. In North Wales, for example, county lines groups have responded to police tactics by changing their use of transport, the type of addresses they stayed in, and the vulnerable people they targeted. During this research, we saw county lines groups adapt to Covid in real time.

Crucially, as chapter 6 explains, the exploitation of young people did not stop because of the lockdown — it adjusted rapidly to the new situation. Yet a recent Ofsted report suggests that children’s homes did not always recognise this risk. When children went missing during the lockdown, inspectors found, *“sometimes the children’s home and police response focused on COVID-19 restrictions, rather than understanding that children may be at risk of other harm, such as exploitation”*.¹⁸ There is also anecdotal evidence that more children were placed in unregulated homes during the lockdown.¹⁹

¹⁵ Robinson, Grace (2019), *Gangs, County Lines and Child Criminal Exploitation: A Case Study of Merseyside*. Doctoral dissertation. Edge Hill University. Available at: <https://research.edgehill.ac.uk/files/28769662/PhD.pdf>.

¹⁶ Ibid.

¹⁷ Hesketh, Robert (2018), *A critical exploration of why some individuals with similar backgrounds do or do not become involved in deviant street groups and the potential implications for their future life choices*. Doctoral dissertation. University of Chester. Available at: <https://chesterrep.openrepository.com/bitstream/handle/10034/621403/DOCTORAL%20THESIS%202018%20DEPOSIT%20VERSION%20.pdf>.

¹⁸ Ofsted (2020), *COVID-19 series: briefing on children’s social care providers, October 2020*.

¹⁹ House of Commons Education Committee (2020), *Oral evidence: The Impact of Covid-19 on education and children’s services*. Accessed via <https://committees.parliament.uk/oralevidence/765/pdf/>.

Due to the data limitations described below, it is not possible to quantitatively compare the exploitation of children in care now and in 2015. However, experts and professionals we interviewed told us that looked after children were vulnerable to exploitation five years ago and remain vulnerable today. Meanwhile, the contextual factors which make care settings risky have become more common: there are more unregulated homes and out-of-area placements, and more teenagers are in the care system.

Children in care are especially vulnerable to exploitation

In 2015, Catch-22 and the NCA published the first comprehensive assessments of county lines exploitation. Both warned that looked after children were targeted by gangs. The Catch-22 report explained that vulnerable adolescents were recruited from residential care, as well as from pupil referral units and schools. Looked after children might be placed away from county lines activity, only to set up a new line or run back to their old area; they might recruit other children through a placement; or they might themselves be recruited while in a children's home.²⁰ The NCA assessment noted that children were more likely to become caught up in county lines if they were either looked after or known to children's social care.²¹

In the five years since then, the risks for children in care have further increased. The children recruited by county lines groups are typically between 15 and 17, an age group which is increasingly coming into care. Teenagers are also more likely to live in semi-independent settings, where they have little supervision and officially receive no 'care'. Published data shows that:

- A growing number of 16–18 year olds have come into care. In 2015, 16–18 year olds were the least likely age group to enter care. In 2019, they were the second most likely.²²
- The proportion of looked after children who are aged 10–15 has gone up by nearly a fifth, though this age group are no more likely to enter care than they were in 2015.²³
- Placements in semi-independent accommodation, which is not regulated by Ofsted, have gone up by 125%.²⁴ As the Children's Commissioner has recently highlighted, 12,800 children spent some time in an unregulated home in 2018/19.²⁵

²⁰ Catch-22 (2015), *Running the Risks: the links between gang involvement and young people going missing*.

²¹ National Crime Agency (2015), *County Lines, Gangs, and Safeguarding*.

²² This is partly explained by an increase in the number of unaccompanied asylum-seeking children: Biehal, Nina (2018), 'Balancing Prevention and Protection: Child Protection in England', in Merkel-Holguin, Lisa et al (eds), *National Systems of Child Protection: Understanding the International Variability and Context for Developing Policy and Practice*, 68.

²³ However, the proportion of 10–15 year olds entering care remained stable between 2015 and 2017, then slightly declined. The absolute number of 10–15 year olds entering care has gone down since 2017: see DfE (2020), *Children looked after in England (including adoption) year ending 31 March 2019*, Table C1.

²⁴ DfE (2020), *National tables: children looked after in England including adoption 2018 to 2019*.

²⁵ Children's Commissioner (2020), *The children who no-one knows what to do with*.

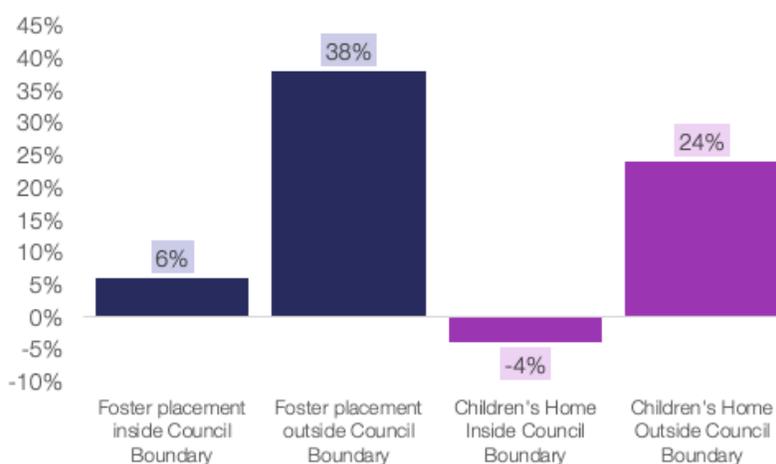
- Placements in residential care outside a child's home authority have gone up by nearly a quarter.²⁶

As out of area placements and placements in semi-independent settings become more common, vulnerable teenagers are more likely to be left without consistent support or adult oversight. These trends mean that looked after children are increasingly vulnerable to county lines exploitation, *and* that they are increasingly likely to slip through the gaps of local service provision and information sharing.

More than two-thirds of children in residential care placements now live in private children's homes.²⁷ Such placements are often determined by narrow cost considerations, rather than the wider welfare of the child. Children are increasingly placed in areas where housing is cheap, even if this is far from their home authority.²⁸ 65% of children in residential care were placed 'out of area' in a different local authority by the end of 2019, up from 48% in 2010.²⁹

Meanwhile, the number of placements in semi-independent accommodation has more than doubled.³⁰ Semi-independent accommodation provides 'support' rather than 'care' to young people, and is not regulated by Ofsted.

Figure 2. Percentage change of children looked after at 31 March, 2015-2019, broken down by location of foster placement and placement in children's home



²⁶ Ibid.

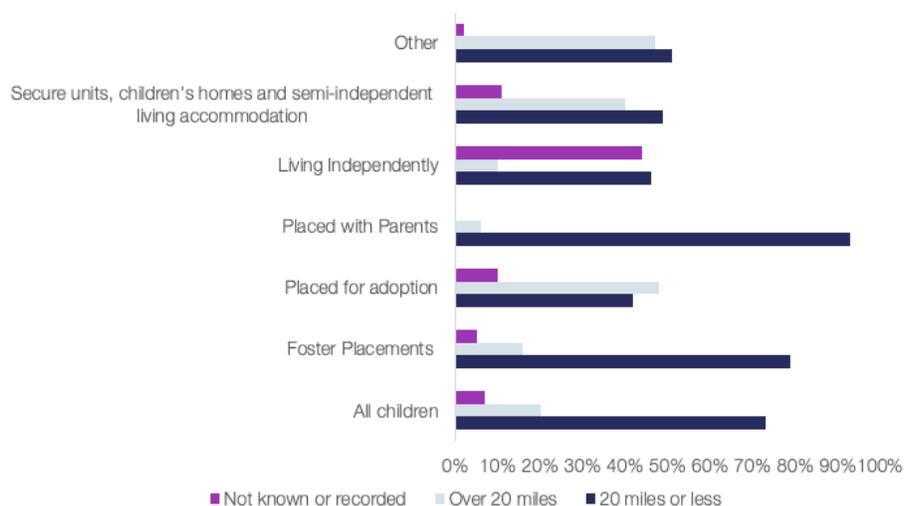
²⁷ Local Government Association (2019), *16-17 year olds in unregulated accommodation*.

²⁸ House of Commons Library (2020), *Looked after children: out of area, unregulated and unregistered accommodation*; The Children's Society (2019), *No Place at Home: Risks facing children and young people who go missing from out of area placements*.

²⁹ House of Commons Library (2020), *Looked after children: out of area, unregulated and unregistered accommodation*.

³⁰ DfE (2020), *National tables: children looked after in England including adoption 2018 to 2019*.

Figure 3. Placements of Children looked after at 31 March, broken down by whether the placement is 20 miles or less, over 20 miles or not known or recorded



Historically, out-of-area placements were reserved for exceptional circumstances. The Children Act 1989 states that where it is ‘reasonably practicable’, looked after children should be placed within their local authority area, near to their home and place of education.³¹ The Department for Education’s statutory guidance explains that some children may benefit from a placement which is outside their local authority area, because it allows them to access specialist support services or keeps them away from known local risks.³²

In practice, local authorities now routinely use out-of-area placements not for safeguarding reasons, but because of a lack of suitable accommodation locally.³³ Despite this trend, many host local authorities lack the resources or capability to cope with out of area placements.³⁴ Out of area placements also make information sharing harder, especially when a child goes missing.³⁵

Placements across the Welsh border are especially difficult. Though many English children are placed in Children’s homes in Wales, these placements frequently ‘lack effective planning and information sharing to determine the availability of local education, health, social and other services to meet the child’s needs’.³⁶ In our research, information sharing emerged as a recurrent problem for police and local authorities.

³¹ Ibid.

³² Department of Education (2015), *The Children Act 1989 guidance and regulations*.

³³ National Audit Office (2019), *Pressures on children’s social care*.

³⁴ See

<https://amp.theguardian.com/society/2018/aug/01/margate-rochdale-children-drugs-gangs-kent-care-exploitation>.

³⁵ Missing People (2019), *The delivery of return interviews: An analysis of freedom of information requests by Missing People on behalf of the English Coalition for Runaway Children (ECRC)*.

³⁶ Department of Education (2015), *The Children Act 1989 guidance and regulations*, p. 59.

To improve the planning and notification process, the Welsh Government has worked with care home providers to introduce an Out of Area Notification Protocol. When a child from another area is placed in residential care in Wales, the care home has a statutory obligation to inform the local Director of Social Services.³⁷ However, this has not solved the problem of safeguarding across borders. For example, return home interviews (RHIs) when a child goes missing — as children caught up in county lines routinely do — are mandatory in England, but not in Wales.³⁸

The statutory obligation for return home interviews sits with a child’s home local authority. In theory, this means that RHIs are mandatory for children whose placing authority is in England, but whose host authority is in Wales. However, in our interviews with North Wales Police, we heard that RHI provision was patchy for children in this position. Where a child went missing and returned to their home local authority, our interviewees were not told whether an RHI had taken place or which issues had been disclosed.

Looked after children are overrepresented in county lines

Given these systemic issues, it is vital that local authorities and other practitioners understand whether (and where) looked after children are at risk. Yet so far, the evidence is patchy. Published data tends to describe the cohort in a single intervention programme, rather than young people in a force area or local authority. As Table 1 shows, the proportion of looked after children within county lines intervention programmes varies hugely — from 55% (a very small sample from Islington’s Exploitation and Missing Service) to 8% (St Giles Early Intervention Project, North Wales).

However, looked after children are significantly overrepresented in the only published data to include more than a small number of young people, the Rescue & Response data for London. Rescue & Response is a MOPAC-funded project which aims to ‘better understand, target and respond to County Lines’. In 2018/19, one in five referrals were in the care of their local authority and three in five had a social care plan; in comparison, looked after children made up only 0.5% of London’s child population.³⁹ In 2019/20, nearly a third of referrals were looked after.⁴⁰

Table 1. Breakdown of social care and educational status for children at risk of criminal exploitation

Source	Cohort	Looked	Social care	Outside
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³⁷ Ibid, annex 5.

³⁸ The Children’s Society (2017), *The Knowledge Gap: Safeguarding Missing Children in Wales*.

³⁹ Rescue and Response County Lines Project (2019), *Strategic Assessment (August) 2019*. LAC population calculated using the London population for ages 0 to 18 in ONS (2020), *Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland, April 2019 local authority district codes version of this dataset*, and the London looked after child population in DfE (2020), *Local authority tables: children looked after in England including adoption 2018 to 2019*.

⁴⁰ Rescue and Response County Lines Project (2020), *Year 2 Strategic Assessment (September) 2020*.

		after	status	mainstream education
Islington Council, Exploitation and Missing Service (2018) ⁴¹	11 children linked to county lines activity	55%	All had a social care status	Not stated
St Giles Pilot Project, Kent (2017/18) ⁴²	41 referrals to county lines pilot project in Kent	30%	40% had a child protection plan while supported by St Giles	100%
London Rescue and Response (2019/20) ⁴³	553 young people referred for possible county lines exploitation	31%	59% were known to have a social care status ⁴⁴	43%
North Wales Multi-Agency County Lines Needs Assessment (2018/19)	109 young people flagged as victims of CCE	30% in care at some point in their childhood	Unclear ⁴⁵	10%
London Rescue and Response (2018/19) ⁴⁶	568 young people referred for possible county lines exploitation	20%	58% were known to have a social care status ⁴⁷	43%
Knowsley Shield (2019/20) ⁴⁸	59 children discussed at multi-agency exploitation meetings	18%	Not known	47%
We Are With You, Shropshire (2020) ⁴⁹	58 young people involved in county lines activity, recruited via	17% ⁵⁰	72% had previous involvement	45%

⁴¹ Islington Council (2018), *Exploitation and Missing Service Overview: CSE, Harmful Sexual Behaviour, Missing, Gangs and Serious Youth Violence*.

⁴² St Giles Trust (2019), *Evaluation of the County Lines Pilot Project*.

⁴³ Rescue and Response County Lines Project (2020), *Year 2 Strategic Assessment (September) 2020*.

⁴⁴ I.e. they were looked after, had a child protection plan or were a child in need.

⁴⁵ Almost seventy percent had been exposed to domestic abuse in childhood, 57% came from households with parental substance misuse issues and 12% had experienced parental neglect severe enough to lead to a child protection plan or care order.

⁴⁶ Rescue and Response County Lines Project (2019), *Strategic Assessment (August) 2019*.

⁴⁷ The social care status of the other 42% was unknown.

⁴⁸ Data shared with us by Knowsley Shield.

⁴⁹ We Are With You (2020), *Exploring the Characteristic Profile and Parental Experiences of Child Criminal Exploitation Within Shropshire*.

⁵⁰ This is the proportion listed as having 'a care status'.

	caseworkers		with social care	
Child Safeguarding Practice Review Panel (2020) ⁵¹	21 children who had died or been seriously harmed as a result of criminal exploitation	10%	14% had child protection plans, but only in relation to extra-familial harm	81%
St Giles Early Intervention Project, North Wales (2018/19)	36 referrals for young people at risk of exploitation or serious youth violence	8%	A further 8% were on child protection registers	31%

Beyond this local data, and the unpublished national data collected by the National County Lines Coordination Centre, existing evidence for the criminal exploitation of children in care settings is essentially anecdotal. This includes the NCA reports, which suggest that youth offenders and young people who have experienced poverty, exclusion from school, family breakdown and/or social care interventions are more vulnerable to criminal exploitation. Children with these histories may seek out relationships and groups which offer ‘a sense of belonging, inclusion and structure’, even if they are exploitative and/or pull the child into offending behaviour.⁵²

Anecdotal evidence is useful for understanding how county lines exploitation presents to professionals, including the police and social care. However, it is also potentially misleading. The county lines model, the local care population and care provision all vary across the UK. Understanding county lines exploitation means knowing how local vulnerabilities interact with local risks. What happens when a child with complex needs is placed in an area where county lines groups are active?

This understanding is possible only where local authorities and police are aware of, and systematically record information about, child criminal exploitation. However, as the Howard League found in their research on the criminal exploitation of children in residential care, recording practices are currently very variable.⁵³ In chapter 5, we explain the barriers to consistent recording and information sharing which we came up against in our research.

⁵¹ The Child Safeguarding Practice Review Panel (2020), *It was hard to escape: safeguarding children at risk from criminal exploitation*.

⁵² National Crime Agency (2018), *County Lines Drug Supply, Vulnerability and Harm*.

⁵³ The Howard League for Penal Reform (2020), *Victims not criminals: protecting children living in residential care from criminal exploitation*.

Measuring and explaining the problem: our approach

This report uses police data and stakeholder interviews to show that looked after children are overrepresented as victims of child criminal exploitation (CCE). We analysed local data from North Wales and Merseyside Police, forces chosen to reflect exploitation at both ends of a county line. This data was supplemented by expert interviews with local stakeholders. The organisations which we spoke to are listed in Appendix B.

Unfortunately, there is no reliable national data to benchmark Merseyside and North Wales against. Though most police forces report that children in their area are exploited through county lines, there is no way to reliably measure the scale of CCE across the country and over time — still less the exploitation of looked after children. However, it can be estimated via:

- **proxy data** — possession with intent to supply offences among young people, and suspected exploitation cases referred to the National Referral Mechanism (NRM);
- **missing and CCE data** — the CCE and care flags used in police forces' missing data and/or separate CCE datasets.

In this report, we drew on NRM, drug offence, missing and CCE data. Appendix C explains which datasets we used, and the nature and limitations of each.

From September, a flag for looked after children will go live on the Police National Database — providing a national breakdown of the number of children who have been flagged for CCE and are known to have been in care. However, data from the National County Lines Co-ordination Centre was not available at the time of publication.

This report takes a contextual approach to the risks experienced by children in care settings. Over the past five years, researchers at the University of Bedfordshire have argued for a new approach to safeguarding — one which addresses extra-familial harms like exploitation, peer abuse and serious youth violence, and focuses on risky settings rather than (just) individual risks.⁵⁴ This 'contextual safeguarding' approach is new, and as yet unproven: the evaluation of the first test site is due to come out later this year. However, it offers a useful way to think about settings where young people are at risk.

In the context of county lines, contextual safeguarding shifts the focus away from the vulnerabilities of individual children, and towards the schools, parks, housing estates, pupil referral units, children's homes and social media platforms where they are at risk of exploitation. Contextual safeguarding asks how these contexts can be made safer, rather than assuming that the child and their family can and should make themselves safe.

Even before the emergence of contextual safeguarding, the DfE guidance for care placements recognised the importance of contextual risks. The 2015 guidance explains that a placing local

⁵⁴ Firmin, Carlene (2020), *Contextual Safeguarding and Child Protection: Rewriting the Rules*.

authority should always ask for a home's location assessment, including 'any measures taken by the home to manage safeguarding concerns arising from the neighbourhood where the home is located'.⁵⁵ Yet in practice, children are placed in out of area care homes and semi-independent accommodation without an assessment of local risk. A contextual safeguarding approach could help to make these settings safer for young people.

Teenagers are more likely to come into local authority care than they were five years ago. They are also more likely to live in out of area residential care or semi-independent accommodation, settings where they lack oversight and/or support from their home local authority. As children in residential settings (and, more broadly, teenagers in care) are likely to have experienced multiple rejections, exploiters are able to capitalise on their insecurities and trauma.

In this report, we describe how local risks interact with the care system in two deep dive areas, quantify the scale of exploitation, and explain how vulnerable young people could be better protected. Our research shows that children's services are failing to safeguard teenagers in care, with an urgent child welfare concern — criminal exploitation through county lines — too often left to the police and third sector agencies.

⁵⁵ Department for Education (2015), *The Children Act 1989 Guidance and Regulations, Volume 2: Care Planning, Placement and Case Review*.

3. County lines in focus: Merseyside and North Wales

Looked after children (LAC) are children who have been taken into local authority care as a statutory intervention to improve their welfare. As their 'corporate parents', state agencies are collectively responsible for the welfare of these children. Yet data from our deep dive areas shows that, far from being effectively safeguarded, looked after children are overrepresented in child criminal exploitation (CCE) cohorts. This chapter sets out the link between missing from care episodes and county lines exploitation, based on data analysis and expert interviews.

We selected Merseyside and North Wales as case studies for our deep dives because they have a symbiotic relationship in terms of both county lines activity and the placement of looked after children. Very few police force areas have been willing to publicly share the data these two forces have shared with us, data which they are under no obligation to publish. Whilst the data paints a worrying picture of how police forces identify and record CCE and county lines, there is no reason to believe that either of these two forces are in a worse position than any other importing and exporting police force in this respect, and huge credit is due to these forces for their willingness to share this data so lessons can be drawn that may help improve practice nationwide.

County lines running between Merseyside and North Wales

Merseyside OCGs have a strong footprint in North Wales. 25 out of 47 organised criminal groups operating in North Wales are mapped and managed by Merseyside police force. Almost all known county lines activity in North Wales originates in Merseyside, as do 45 per cent of the offenders linked to county lines activity. 60% of children flagged with child criminal exploitation (CCE) by North Wales Police are from Merseyside.⁵⁶

Just two county lines in North Wales do not originate from Merseyside.⁵⁷ The lines travel into North Wales in two ways. Firstly, lines travel across the Welsh border into Flintshire and Wrexham local authorities to towns in close proximity to Merseyside. Secondly, lines travel to coastal towns in North Wales including Rhyl, Colwyn Bay, Abergele, Llandudno, and Bangor.

Disproportionality of children in care: missing children

At national level, over one in ten children in care went missing in the year ending March 2019.⁵⁸ Across all types of care placements, children in care are more likely to be reported missing from children's homes and semi-independent accommodation than any other type of placement (including foster placements). Nationally, 50 per cent of all children in care who went missing in

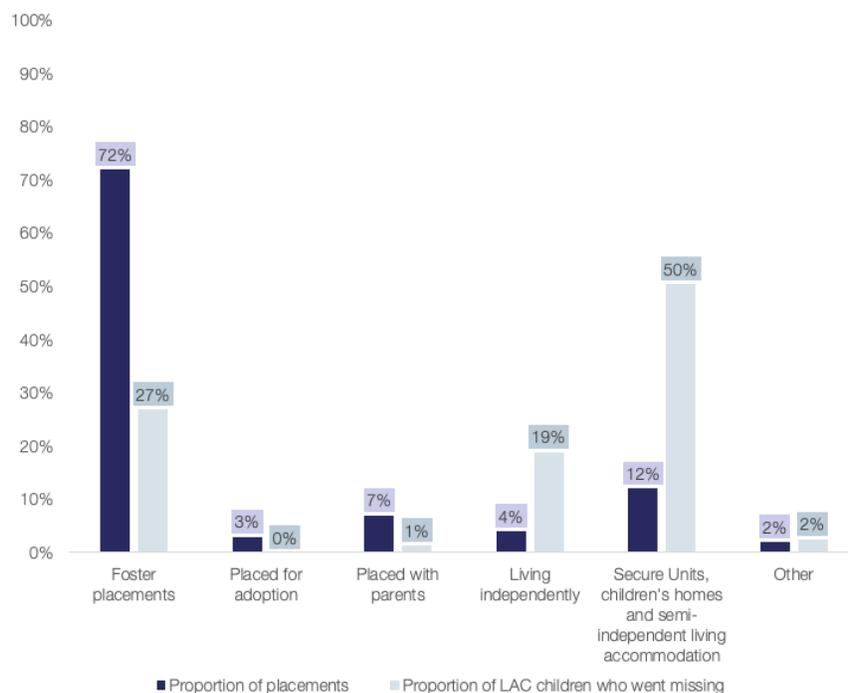
⁵⁶ Safer Communities Board (2019), *North Wales Multi-Agency County Lines Needs Assessment*. Unpublished.

⁵⁷ North Wales Crime Services (2019), *Community Profile 2019: Conwy and Denbighshire*. Unpublished.

⁵⁸ Department for Education (2020), *Children looked after in England including adoption: 2018 to 2019 – children looked after missing from their placement 2018 to 2019*.

2018/19 went missing from these types of placements, despite just 12 per cent of children in care being placed in these settings (see Figure 4).⁵⁹

Figure 4. Proportion of LAC placements compared with proportion of LAC children who went missing from these placements, year ending March 2019



The proportion of children in care in Merseyside is higher than the national average, at 1.2 per cent.⁶⁰ At the end of the year in 2019, nearly 3,500 children were placed in care across five local authorities, with 10 per cent categorised as placed in secure units, children's homes and semi-independent accommodation. The proportion of children in care in North Wales is 0.9 per cent, just above the national average, with 1,295 children placed in care across six local authorities.⁶¹

According to police intelligence, CCE in North Wales is “*strongly associated*” with county lines.⁶² Analysis suggests there is an overlap between areas where children are reported missing (see Figure 5) and areas in North Wales where there are active county lines, including Wrexham, Holywell in Flintshire, Rhyl in Denbighshire, Llandudno, Abergele and Colwyn Bay in Conwy, and

⁵⁹ Ibid.

⁶⁰ Department for Education (2020), *Children looked after in England including adoption: 2018 to 2019*.

⁶¹ StatsWales (2020), *Children looked after at 31 March by local authority, gender and age*.

⁶² North Wales Crime Services (2019), *Community Profile 2019: Conwy and Denbighshire*; North Wales Crime Services (2019), *Community Profile 2019: Anglesey and Gwynedd*; North Wales Crime Services (2019), *Community Profile 2019: Flintshire and Wrexham*. Unpublished.

Bangor in Gwynedd. Almost three quarters of the active county lines in North Wales are known to have exploited young people, including children in the care system.⁶³

To understand the prevalence of looked after children in county lines, we analysed data from Merseyside and North Wales, including analysis of over 13,000 missing incidents in the last two years and over 700 children flagged with criminal exploitation.

Figure 5. Missing incidents from care by locations with most incidents, North Wales



- North Wales Police noted that 48 per cent of missing children are missing from care, rising to 54 per cent of children in Wrexham.⁶⁴
- Within their missing data, 31 per cent of missing reports involved a child going missing from care.

Analysis of data in North Wales suggests that 71 per cent of those with county lines exploitation flags had a history of missing episodes, and 30% had been in care at some point in their childhood.⁶⁵ Missing data covering the last two years (1st April 2018 to March 2019) from Merseyside and North Wales police forces was analysed to better understand the prevalence of children in care.

⁶³ Ibid.

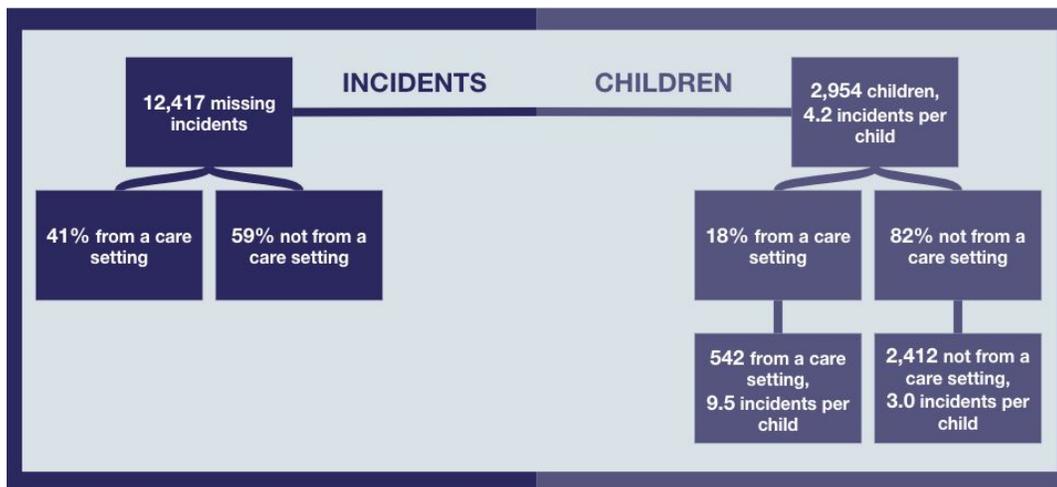
⁶⁴ North Wales Crime Services (2019), *Community Profile 2019: Flintshire and Wrexham*. There are more care establishments in Wrexham.

⁶⁵ Safer Communities Board (2019), *North Wales Multi-Agency County Lines Needs Assessment*. Unpublished.

In both Merseyside and North Wales, looked after children were overrepresented within the missing cohort.

- In Merseyside, of 2,954 children reported missing in the period we analysed, 18 per cent went missing from care homes, semi-independent accommodation and supported living.
- There were 12,417 missing incidents — 41% of these incidents were reported from residential care placements and unregulated accommodation, suggesting the children from these placements were more likely to go missing repeatedly.

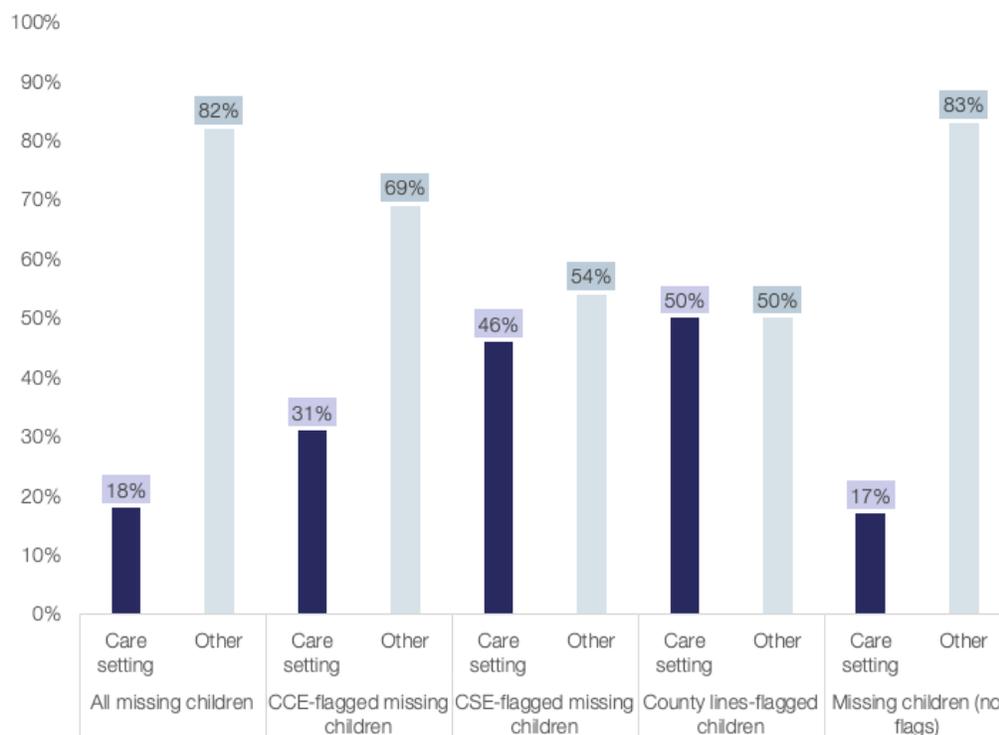
Figure 6. Breakdown of missing incidents and missing children in Merseyside



As in North Wales, missing episodes in Merseyside were also linked with criminal exploitation, including for children who were reported missing from care. The proportion of children in care who went missing from their placements in Merseyside was higher when an exploitation or county lines flag was also recorded:

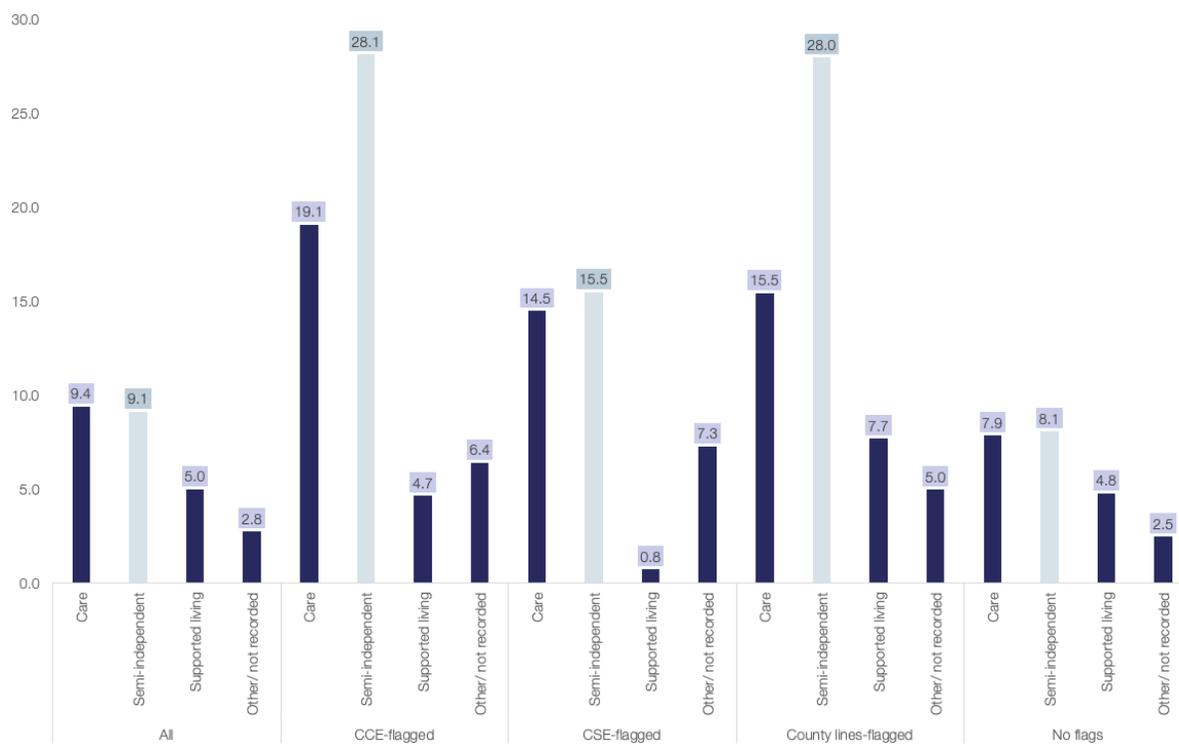
- 22 out of 44 children flagged for county lines went missing from placements in children's homes and unregulated accommodation;
- 46 per cent of children flagged with child sexual exploitation (CSE) and 31 per cent of children flagged with child criminal exploitation (CCE) went missing from these placement types (see Figure 7).

Figure 7. Proportion of missing children from care settings (care home, semi-independent accommodation and supported living), Merseyside



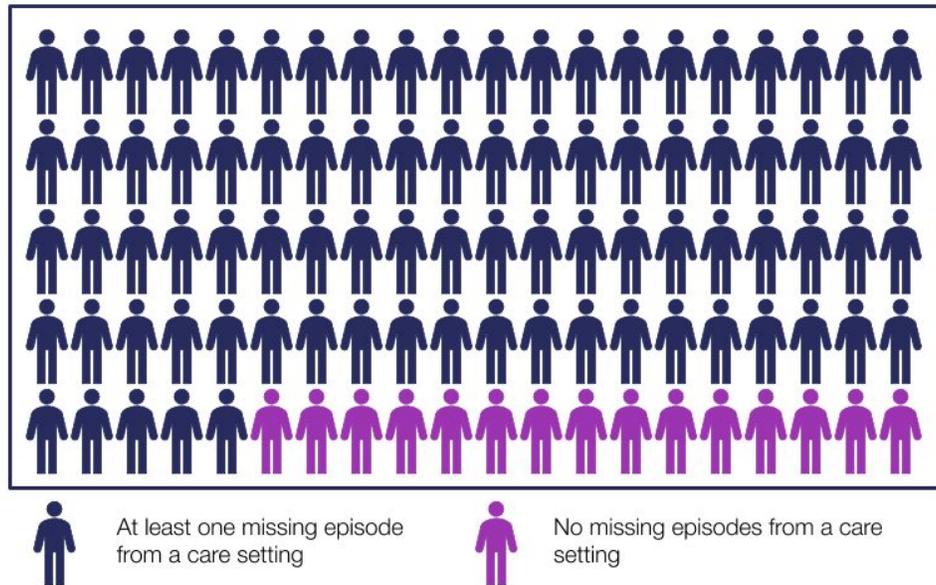
In Merseyside, young people in ‘unregulated’ semi-independent accommodation were particularly at risk of going missing. Children with CCE flags and children with county lines flags who went missing from semi-independent accommodation went missing on average 28 times, compared to similarly flagged children from care homes who went missing on average 19.1 times and 15.5 times respectively.

Figure 8. Average number of incidents from specific care settings (care home, semi-independent accommodation and supported living) by flag type, Merseyside



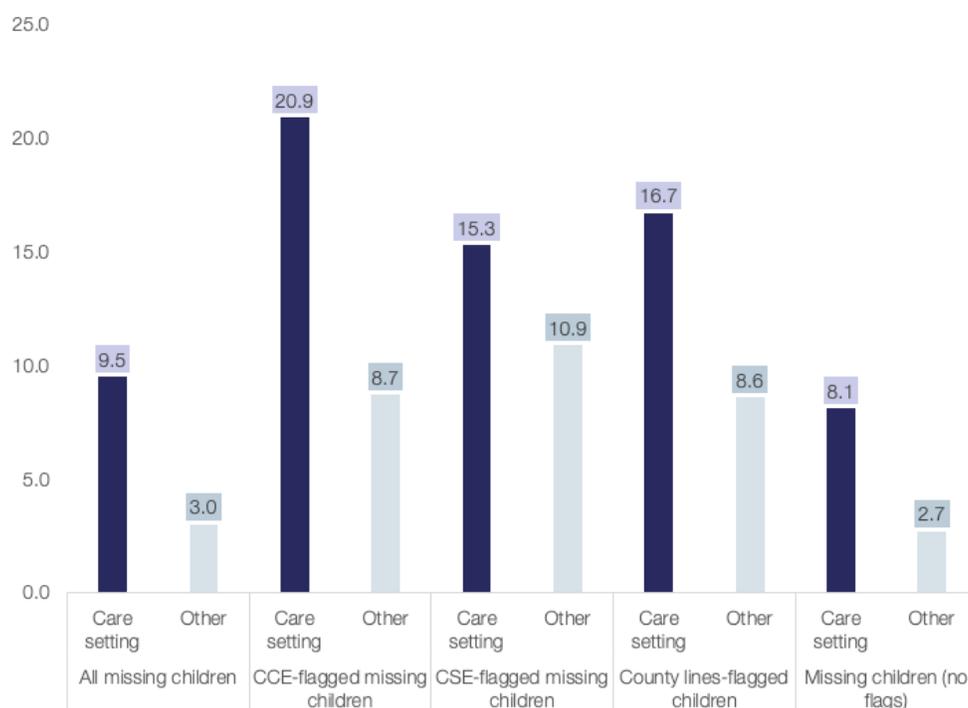
In Merseyside, children in care settings were more likely to be reported missing repeatedly. Of the top 100 children who were reported missing the most over the last two years in Merseyside, just 15 children did not go missing at all from a care placement.

Figure 9. 100 children with the most missing episodes in the last two years in Merseyside



Children in care associated with criminal exploitation were also more likely to go missing repeatedly. Across any cohort analysed within the Merseyside dataset, children reported missing from care homes, semi-independent accommodation and supported living were likely to have been missing more than those not living in these placements. For children in these placements flagged with CCE, the average number of incidents reported was 20.9 compared to 8.7 incidents for children not residing in these placements.

Figure 10. Average number of incidents for children reported missing from care settings (care home, semi-independent accommodation and supported living)



Missing incidents and county lines

Of the 44 children in Merseyside with a police county lines flag who had missing incidents recorded in the last two years, 22 went missing from a care setting at least once — the highest proportion of any group within the dataset. Of the ten children who went missing the most frequently, just two had no missing episodes reported from a care setting.

It is important to note that this low total (44 missing children with county lines flags) is highly unlikely to reflect the true volume of missing children involved in county lines. The low numbers are more likely to be a product of inconsistent recording by Merseyside police. As we discuss below the inconsistent use of county lines and CCE flags by police officers remains a barrier to understanding the scale and nature of the problem.

Figure 11. 44 children with county lines flags who have been reported missing in the last two years in Merseyside (in order of most episodes)



St Helens in Merseyside showed a particularly high level of missing incidents from care settings. One third of all missing incidents with a county lines flag within Merseyside were reported missing from St Helens, and 92% of these incidents in St Helens were reported from a care setting, specifically care homes and semi-independent accommodation. Merseyside Police told us that they know of at least one gang in St Helens who are targeting looked after children as part of their operating model, especially those children residing in St Helens. The care system in St Helens is discussed in more detail in chapter 4.

The police have acknowledged that looked after children travel from St Helens into North Wales along active county lines, in line with the 'traditional' model of county lines exploitation. The North Wales police intelligence reports on county lines notes a *"sophisticated criminal network operating out of the St Helens and Birkenhead areas of Merseyside from where several young people have been trafficked across North Wales to work with county lines gangs"*.⁶⁶

"There has been a massive spate last year with St Helen's kids being recruited from care homes in St Helens, as well as involving children aged 15/16 in semi-independent unregulated accommodation."
 - County lines intelligence officer, North Wales Police

⁶⁶ Safer Communities Board (2019), *North Wales Multi-Agency County Lines Needs Assessment*. Unpublished.

The most prolific missing child in Merseyside with a county lines flag has had 51 incidents in the last two years, and on all occasions he had gone missing from St Helens. He was recorded missing aged 15 at the first record incident, from a care home, and went missing from this care setting nine times in the space of five months. He was subsequently placed in semi-independent accommodation from which he has gone missing a further 40 times (two placements have not been recorded but are likely to have been from a care setting). Although he only went missing on average for less than half a day (the longest incident lasted nearly two days), every incident except one was reported late at night or in the early hours of the morning.

Five children with county lines flags went missing from semi-independent accommodation in Merseyside, with an average of 22 incidents for children recorded missing from this placement. This compares to an average of 15 incidents for children reported missing from a care home, and 5 incidents for children who were not reported missing from a care setting. One child, who was 14 years old at the first recorded incident, went missing 15 times from semi-independent accommodation, having also gone missing previously from a care home. In one of these incidents, he was found in Mold in North Wales after nearly 3 days (a town in Flintshire where county lines gangs are active).

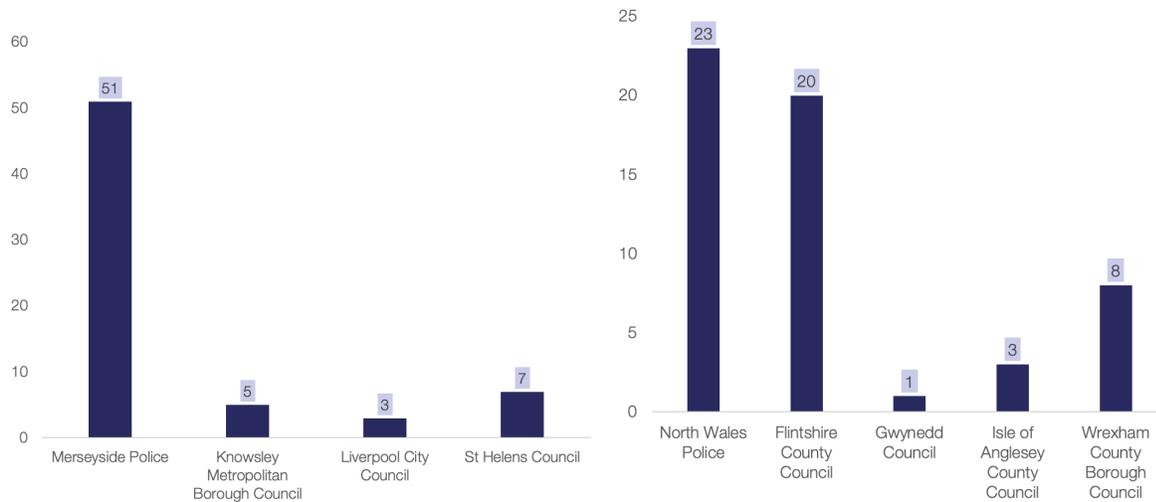
Disproportionality of children in care: child exploitation

Alongside the CCE and county lines flags applied to missing data, a growing number of forces are recording CCE flags for individual children who come into contact with the justice system. Data on criminal exploitation has been traditionally poor and it is difficult to establish trends over time, especially with a level of granularity which might enable us to identify care status.

For example, the National Referral Mechanism has only recently added a category for criminal exploitation. There were around 60 NRM referrals in Merseyside in 2019 and over 50 for children 17 and under in North Wales.⁶⁷ This data does not indicate how many of the referrals concern children in care.

Figure 12. Number of NRM referrals by first responder in Merseyside and North Wales in 2019, for children 17 or under

⁶⁷ Home Office, National Referral Mechanism statistics UK: End of year summary 2019 second edition (tables 17 and 26)



We received data from Merseyside Police with victims of child criminal exploitation from January 2017 to July 2020, with care status flagged against each child. We also received similar data from North Wales covering the period from September 2019 to April 2020.

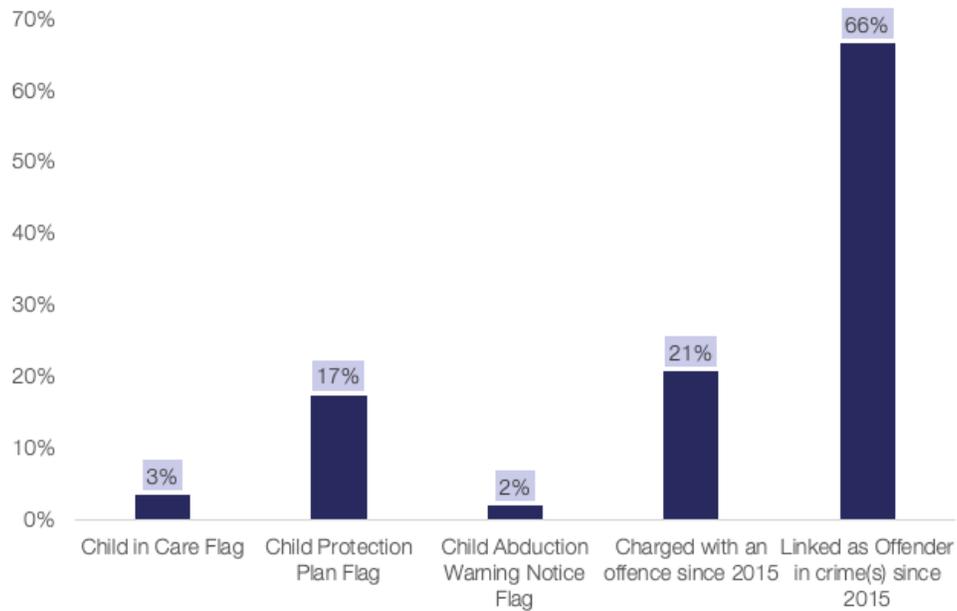
Serious challenges in data recording

In Merseyside, just 18 out of 531 individuals had been flagged with both criminal exploitation and care status. This is lower than the number of looked after children flagged with CCE (n=38), CSE (n=47) or even county lines (n=22) in the data on missing children, which contained missing incidents over just a two year period.

This finding conflicts directly with the experience of officers in Merseyside Police, including those responsible for protecting vulnerable people, who say a high proportion of children in care have been involved in county lines and that there is “clear evidence” for it.

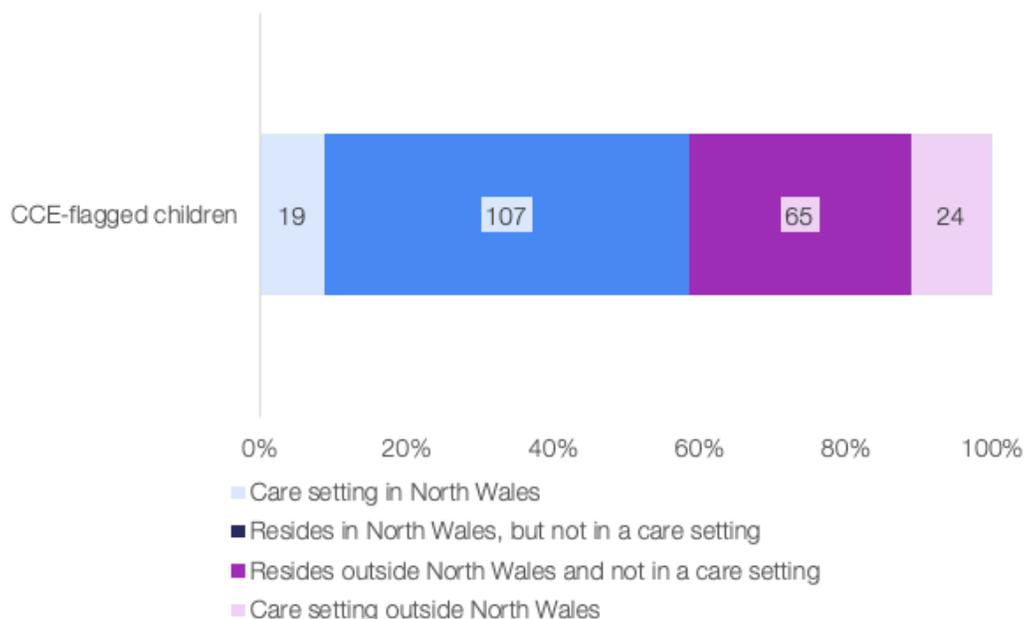
The disparity suggests that police officers in Merseyside have not consistently recorded care status in relation to criminal exploitation, and highlights existing concerns about police recording of exploitation (see chapter 5). The use of the CCE flag had increased from 12 occasions in 2017 to 312 occasions in 2020 (up to July), suggesting that the flag has only been regularly used more recently.

Figure 13. Child exploitation by flag type, Merseyside



In North Wales, a much smaller police force with a smaller population under 18, 22% of CCE flagged children recorded live in extra-familial settings, with 17% in care homes, semi-independent accommodation and supported living accommodation. It is inconceivable that there could be 37 CCE flagged children in North Wales from care homes, semi independent and supported accommodation in less than two years of data and only 18 CCE flagged children in Liverpool in over three years of data across all care placements. It is even more doubtful that care status is being properly recorded in Merseyside when just one of these children has been flagged as living in St Helens.

Figure 14. Child criminal exploitation in North Wales by residence (care setting = care home, semi-independent accommodation and supported living accommodation)



Implausibly gendered CCE and CSE cohorts

The role of CSE in county lines exploitation remains poorly understood. The literature suggests that exploiters use sexual violence to punish, shame and coerce young people.⁶⁸ The Children’s Society has further argued that “plugging”, where children carry drugs inside their bodies, is “quite clearly a form of sexual violence”.⁶⁹ Though the literature and our interviews suggest that both girls and boys experience sexual violence within county lines, the CSE cohorts shared with us were almost entirely female. In contrast, the CCE cohorts were near-exclusively male. This reflects flawed assumptions about gender and exploitation, as well as flawed recording practices.

In our interviews, we heard about the widespread assumption that only girls are vulnerable to CSE and only boys are vulnerable to CCE. This means that girls’ traumatic experiences within county lines are not fully acknowledged – and, as a result, that they do not get the help they need. It also means that the sexual exploitation of boys within county lines goes unrecognised. In North Wales, it was suggested that young men being sexually abused in North Wales was a “hidden issue”.

⁶⁸ Catch-22 (2015), *Running the Risks: the links between gang involvement and young people going missing*; National Crime Agency (2016), *County Lines Gang Violence, Exploitation and Drug Supply*; The Children’s Society (2017), *Criminal exploitation and County Lines: A toolkit for working with children and young people*; Home Office (2018), *Criminal Exploitation of children and vulnerable adults: County Lines guidance*; The Children’s Society (2019), *Counting Lives: Responding to children who are criminally exploited*; <https://www.theguardian.com/uk-news/2019/sep/15/airbnb-and-a-free-lunch-how-county-lines-drug-gangs-lure-teenagers>.

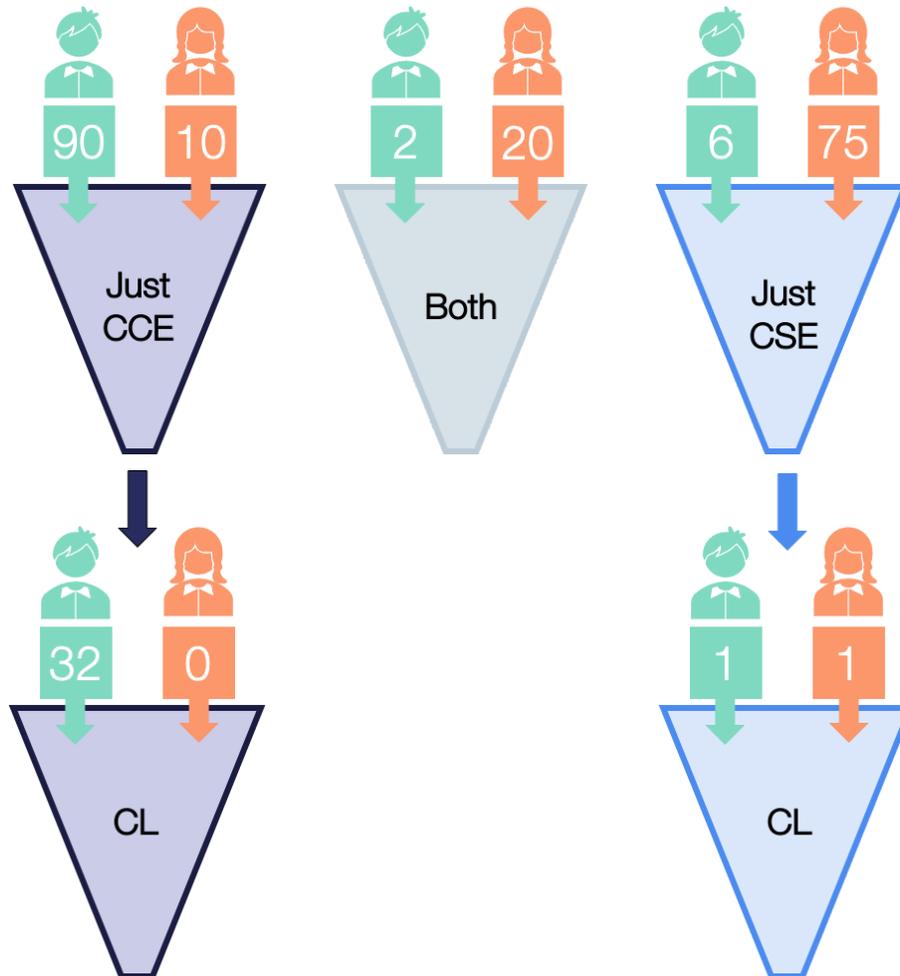
⁶⁹ Children’s Society (2019), *Counting lives: Responding to children who are criminally exploited*.

If exploitation flags are unreliable or inconsistent, services will fail to grasp the true extent of children's involvement in county lines. Police cannot assume that a boy's role in county lines is active and reflects criminal exploitation, whereas a girl's role is passive and reflects sexual exploitation. This assumption obscures both the active role of girls in drug running and the sexual exploitation of boys, who may be forced to pay off debts with sexual favours. The overlap between criminal and sexual exploitation was understood by many of the practitioners we spoke to, though it is seemingly missed in data recording.

Within Merseyside's missing data, just 10 girls were flagged with just CCE, compared to 75 girls with just CSE (see Figure 15). 36 of those girls were reported missing from care. Another girl was even flagged with county lines, having gone missing from a care home 18 times in the last 2 years. She was not flagged, however, with child criminal exploitation.

Most of these girls had a long history of missing episodes. This history did not end when they moved into care settings; instead, their missing episodes often accelerated in care. If vulnerable girls are placed in residential settings, it is crucially important that these placements are safe — that they help young people to get out of exploitative situations, rather than leaving them with even less support.

Figure 15. Children reported missing flagged with just CCE or CSE, or both, and then those who are also flagged with CL, Merseyside



Greater awareness of sexual exploitation within county lines could also help to change attitudes — including those of exploiters. A senior officer from Merseyside Police explained that, when OCG members are charged with modern day slavery offences against children, “[t]hey then go on the sex offenders wing and [because of the reputational damage this does] very quickly they’ll drop using kids, they’ll drop it completely”.

[Taking a victim-focused and data-driven approach to understanding county lines](#)

The data from our deep dives in North Wales and Merseyside affirms the link between care status, especially in care homes and semi-independent accommodation, and missing episodes and criminal exploitation. However, this only gets us so far in understanding those drawn into county lines activity. To inform the service response, comprehensive cross-sectional analysis of those involved in county lines must be consistently recorded across England and Wales. HMICFRS has

recently identified shortcomings in both the intelligence process undertaken by police and the data gathering and sharing of services involved in county lines.⁷⁰ Our understanding of county lines is slowly improving. For example, the National County Lines Coordination Centre (NCLCC) has introduced a flag recording care status alongside a flag recording victims of exploitation for all police forces.

But there is room for more ambition. Services should be able to identify who is most at risk, children and adults, so that they can target the contexts in which exploitation occurs as well as supporting those identified as most at risk of exploitation. Our understanding of contextual risk (see chapter 4) must also inform how we collect and share data. Data analysed for this report indicates that the risk from particular care settings, care homes and semi-independent accommodation puts children more at risk of going missing and being exploited. Services must reflect on how and why the most prolific missing child flagged with county lines in Merseyside was placed in semi-independent accommodation, having already gone missing nine times from a care home.

Our understanding of vulnerability must also inform how we collect and share data. The focus of this research has been on children in care, but there is a broader profile of victims of CCE that need to be understood. Moreover, while there is an understandable focus on child criminal exploitation, there is also a cohort of vulnerable adults who are exploited and who may be outside of the field of vision.

⁷⁰ HMICFRS (2020), Both sides of the coin: the police and National Crime Agency's response to vulnerable people in 'county lines' drug offending

4. Out of sight, out of mind?

This chapter and the next explain *why* children in care are overrepresented in CCE cohorts. Though both individual and contextual factors leave looked after children at risk of criminal exploitation, this chapter focuses on the risks which are associated with some care settings — the environments which vulnerable children are placed in, and the ways in which they are helped (or not helped) to navigate those environments.

Since 2015, the number of children in local authority care in England has increased by 12 per cent, from just under 70,000 (rate of 60 per 10,000 children under 18) to nearly 80,000 (rate of 65 per 10,000 children under 18).⁷¹ This increase is predominantly accounted for by adolescents, with the number of looked after children in the age groups ‘10-15’ and ‘16 and over’ increasing 18 per cent and 21 per cent respectively since 2015. This has presented local authorities with the challenge of securing appropriate placements for adolescents with complex, multiple vulnerabilities.

As a result across England and Wales, a growing number of teenagers are placed in residential care and semi-independent ‘unregulated’ accommodation. Many young people entering care are being placed at distance due to a lack of suitable placement in their local area — separating them from their schools, social workers, from local authority services and of course from their friends and families.

Distant placements make it harder to safeguard children and young people. Staff from St Helens children’s services told us that when a child is placed at distance, it becomes extremely difficult to manage contextual risks. The ‘host’ local authorities for these distant placements lack the resources to intervene locally when a child is placed in a setting within their boundaries by another local authority.

This makes it even more important that residential care settings should be places where teenagers feel safe, listened to, and supported. Staff must understand exploitation and abuse, and to encourage their young people to seek help, support and guidance. Some providers are able to offer this support, recognising signs of exploitation and building trusted relationships. Others are not. As greater numbers of vulnerable adolescents enter care, many settings are failing to protect their young people. Though the quality of support and care varies from home to home, the structure of the current residential care market ultimately leaves children at risk.

Trends in the care system have increased risk

In Merseyside, as in the rest of the country, there are more 16–18 year olds in care than there were five years ago. The overall number of children in care has gone up by a fifth; residential care is increasingly offered by the private sector, though there are more local authority owned homes than

⁷¹<https://www.gov.uk/government/statistics/children-looked-after-in-england-including-adoption-2018-to-2019>

the national average; and a greater proportion of looked after children are placed in residential care or semi-independent accommodation in Merseyside.

Figure 16. Age breakdown of children looked after by Merseyside local authorities, 2014/15 to 2018/19



Figure 17. Placement types for children looked after by Merseyside local authorities, 2014/15 to 2018/19

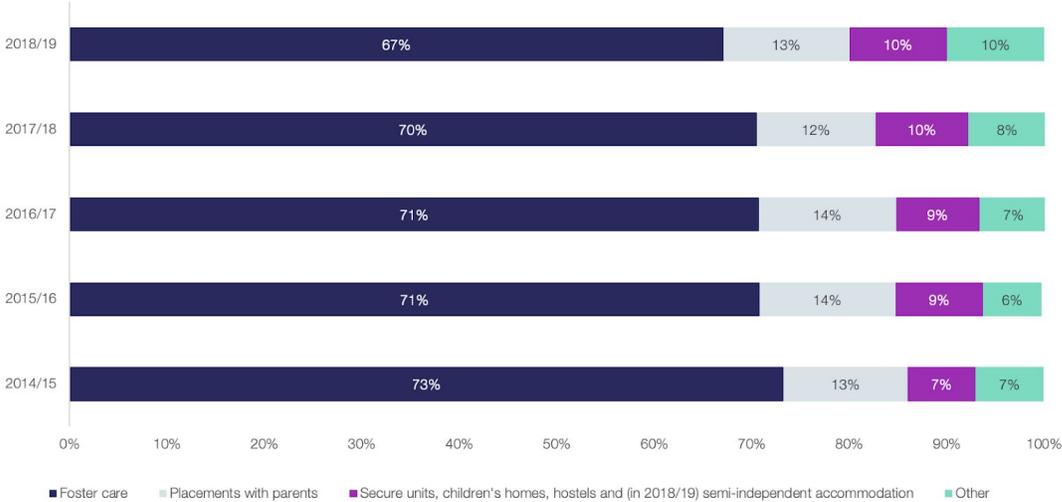


Figure 17 shows that the proportion of children placed in residential care and semi-independent accommodation has increased since 2015, as has the proportion of ‘other’ placements. Most children in these placement types are boys in their mid-to-late teens, the group most likely to be criminally exploited.⁷²

There is no way to separate residential care and semi-independent accommodation in the data, but the national statistics show that semi-independent accommodation is growing rapidly. In our interviews, Merseyside Police and local authorities repeatedly brought up these privately-owned,

⁷² Narey, Sir Martin (2016), *Residential Care in England*; Department for Education (2020), *Looked after children in independent or semi-independent placements*.

unregulated homes. Despite housing some of the country's most vulnerable children, they can be deeply unsafe. As one of the police officers we interviewed put it:

“I would never allow my son to stay alone in one of those places for even two or three days – why would we expect any other child to stay there?” - Merseyside Police Officer

Because semi-independent settings provide *support* to children in their late teens, rather than *care*, they are not registered with or inspected by Ofsted. As a result of concerns raised about the suitability of unregistered settings, Merseyside Police explained that they have lodged objections to individual planning applications, making the case that a particular home is likely to increase crime or antisocial behaviour. However, case studies shared with us by the Missing Persons Prevention Unit show that these objections are not always upheld by local planning authorities.

If planning officers worked with children's services and the police to consider contextual risk, the planning process could become a way to constrain the growth in unregulated settings. Instead, the case studies suggest, inappropriate care settings can often be set up with little consequence.

Case Study #1 (Merseyside)

A former doctor applied to convert a residential care home into a supported accommodation setting. The Care Quality Commission had closed the home because of ten serious breaches and fears for people's safety, including kitchens that were unsafe, a rodent infestation, faulty electrics giving staff static shocks and serious fire risks.

The local authority refused the application, and this decision was upheld at appeal by the planning inspector. The decision was based on the risk of “noise and disturbance” to neighbours.

Case Study #2 (Merseyside)

The applicant was subject to an investigation by the local authority when they worked for another supported accommodation setting, having failed to follow safeguarding rules when a gun was found in the possession of a young woman. The police took no further action, but the applicant and a colleague were subject to disciplinary action by their employer. The applicant did not give their first name on the application form.

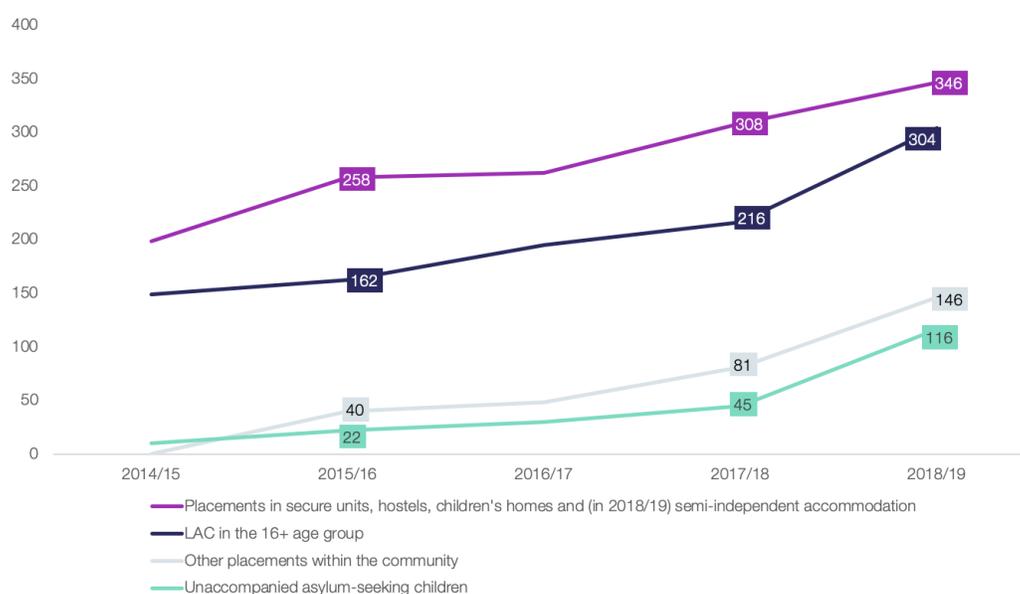
This application was approved by the local council, who noted that “the planning system is concerned primarily with the effect of a development, rather than the identity of an applicant”.

Our interviewees had less to say about the growth of ‘other’ placements, which are mostly placements within the community. Community placements are a common placement type for

teenagers in care, and usually mean living independently.⁷³ In Merseyside, most of these placements are for children looked after by Liverpool (73% in 2018/19). As Figure 18 suggests, they may reflect numbers of unaccompanied asylum-seeking children.

Across the UK as a whole, 43% of children living independently and 36% of children in semi-independent, unregulated accommodation are asylum-seeking children.⁷⁴ Though their experiences are outside the scope of this research, local authorities should consider whether these especially vulnerable young people are being placed in unsafe settings due to their increased vulnerability.

Figure 18. Trends in the number of residential placements, community placements, 16–18 year olds in care and unaccompanied asylum-seeking children in Liverpool, 2014/15 to 2018/19⁷⁵



Each of the local authorities within the Merseyside police force area faced with different risks, and offer tailored services in response. In Knowsley, which is one of the test sites for contextual safeguarding, the multi-agency Shield team lead the response to child exploitation. We spoke to the team, who explained that the care system was not one of their biggest concerns — and that the local authority has worked hard to place the children who it looks after within the area (see Figure 20).

⁷³ Shuker, Lucie (2013), *Evaluation of Barnardo's Safe Accommodation Project for Sexually Exploited and Trafficked Young People*. The evaluation uses DfE analysis of a cohort of 9,550 looked after children aged 14 and over, which found that 28.7% had spent time in this type of placement. It was the third most placement type for teenagers, behind foster care in the child's local authority area and residential care.

⁷⁴ Department for Education (2020), *Looked after children in independent or semi-independent placements*.

⁷⁵ Most unaccompanied asylum-seeking children are 16–18. Biehal, Nina (2018), 'Balancing Prevention and Protection: Child Protection in England', in Merkel-Holguin, Lisa et al (eds), *National Systems of Child Protection: Understanding the International Variability and Context for Developing Policy and Practice*, 90.

In contrast, St Helens' response has focused on children in care. Last year, St Helens was featured in a BBC investigation into county lines. The investigation showed that looked after children were being exploited in St Helens, and recruited to a line which ran from Merseyside to North Wales.⁷⁶ St Helens set up a County Lines Task Force in response to the coverage, and published a report into its findings earlier this year.

The report raised concerns about private children's homes in St Helens, and the potential risks to children placed there from other areas. It also noted a recent increase in semi-independent, unregulated homes, from 29 to 55.⁷⁷ In July this year, nearly a fifth of the 16–17 year olds looked after by St Helen were living in semi-independent, unregulated accommodation run by private providers.⁷⁸ The task force also found that in 2018/19, nearly three quarters of missing children were in care.⁷⁹

The local authority's data includes only children in the care of St Helens, not those placed there from elsewhere. This is part of the broader disconnect in data collection described in chapter 5, which makes it hard for local authorities to understand the needs and risks of children placed in their area. All the same, the published data shows that:

- the number of St Helens children in secure, residential or semi-independent settings has increased from 5 or under (March 2015) to 55 (March 2019);
- the number of children taken into care via Section 20 of the Children Act, which can be used to safeguard teenagers at risk of extra-familial harm, has increased from 5 or under (March 2015) to 53 (March 2019);⁸⁰
- the average Strengths and Difficulties Questionnaire score for children looked after by St Helens has gone from normal to borderline (March 2017 to March 2019).⁸¹ This suggests that more children are experiencing emotional, behavioural and/or social problems.⁸²

St Helens has historically struggled to cope with pressures on its social care services. In 2018, Ofsted rated its children's services 'inadequate'. A focused visit found that assessments were vague about children's histories and risks.⁸³ A follow-up inspection last year found that no children were left at risk of immediate harm, and that the daily, multi-agency meetings to discuss potential

⁷⁶ BBC News (2019), *Liverpool to North Wales: Up close with a county line*.

⁷⁷ Safer Communities and Children & Young People Services Overview & Scrutiny Panels (2020), *Spotlight Review of County Lines Issues within St Helens*.

⁷⁸ https://www.whatdotheyknow.com/request/lac_16_18_year_olds_78.

⁷⁹ Safer Communities and Children & Young People Services Overview & Scrutiny Panels (2020), *Spotlight Review of County Lines Issues within St Helens*.

⁸⁰ In June 2019, the total number of children accommodated under Section 20 was 65: https://www.whatdotheyknow.com/request/accomodation_of_s20_children_14.

⁸¹ Average SDQ scores are only available from 2017.

⁸² On the reliability of the SDQ, see <https://www.corc.uk.net/outcome-experience-measures/strengths-and-difficulties-questionnaire/>.

⁸³ Ofsted (2018), *Focused visit to St Helens local authority children's services*.

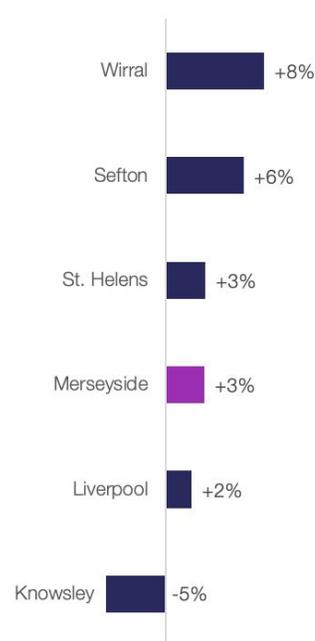
victims of exploitation were effective. However, the quality of children’s services overall remained inadequate.⁸⁴

When we spoke to staff from St Helens, they expressed concern about both private care providers and external placements. Placements from other local authorities to St Helens went up by nearly a third between 2015 and 2019, as part of the wider shift towards private children’s homes in areas with low property prices (see Figure 19). Though most of these placements were from relatively nearby authorities, some were from London and other faraway cities.

Figure 19. Percentage change in external placements to a Merseyside local authority, 2014/15 to 2018/19⁸⁵



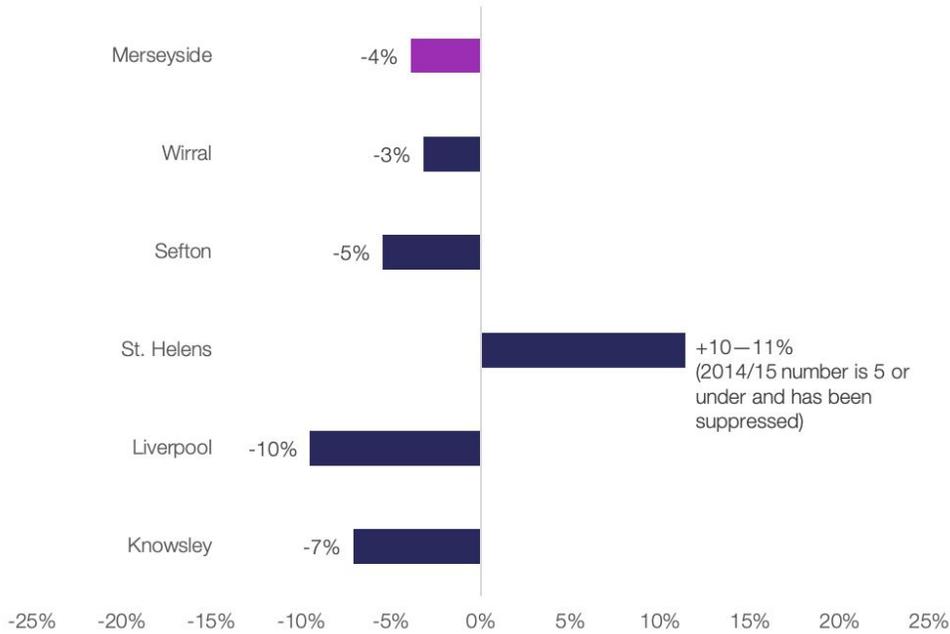
Figure 20. Percentage change in children placed out of area by a Merseyside local authority, 2014/15 to 2018/19



⁸⁴ Ofsted (2019), *St Helens Metropolitan Borough Council: Inspection of children’s social care services*.

⁸⁵ Department for Education (2015–2020), *Children looked after in England including adoption*. The graphs in this chapter are based on the underlying data tables.

Figure 21. Percentage change in the proportion of looked after children accommodated under Section 20, 2014/15 and 2018/19



As Figure 21 shows, Section 20 orders have also increased in St Helens — though not in the rest of Merseyside. Section 20 applies to children who nobody has parental responsibility for, children whose parents have agreed to the local authority accommodating them, and children who are over sixteen and have chosen to enter care themselves.⁸⁶ Teenagers whose parents are struggling to cope with their behaviour may enter care this way, along with those who need to escape a dangerous environment.

In St Helens, the growth in semi-independent accommodation and in the use of Section 20 may be linked. Nationally, most of the children in semi-independent, unregulated accommodation enter care through Section 20 rather than a court-imposed care order. This is true even when unaccompanied asylum-seeking children, who automatically fall under Section 20, are excluded.⁸⁷

Though we have no concrete evidence that Section 20 orders are taken out by (or for) exploited children in St Helens, we have anecdotally heard that Section 20 is used to protect children from extra-familial harm. Sometimes, this is because parents put their children into care to move them away from local risks. At other times, children sign their own care orders. One of our interviewees, who works with young people who have been exploited through county lines, explained that in his experience:

⁸⁶ <https://www.legislation.gov.uk/ukpga/1989/41/section/20>.

⁸⁷ Department for Education (2020), *Looked after children in independent or semi-independent placements*.

“Kids will put themselves into care if they feel vulnerable. If they've exhausted every avenue, then they'll put themselves into care, just to get out of the area.”

In our interviews, we have heard about placements which give victims of exploitation exactly the support they need, establishing trusted relationships and helping them to rebuild their lives. However, we have also heard about placements which leave young people at continued or greater risk. This is most likely when unregulated, semi-independent settings are responsible for young people with traumatic histories and complex needs.

Case Study #4

A teenage boy living in a town near London 'got involved in the wrong crowd', becoming involved in postcode wars and county lines. His mum put him into care to protect him, and he was placed in a short-term support placement in North Wales. He was then moved to a crisis placement in an isolated area.

He found the placement homely and supportive, and appreciated that staff did not judge him for things which he had done in the past. This helped him to understand that there was a future for him outside of county lines. Though he would rather live in a more urban area in the longer term, he felt that its location helped him to recover, distancing him from the people he had mixed with before. He was also able to attend mainstream schooling again, which he had been out of for a while before entering care.

When we spoke to him, he had been living in the placement for nine months and was unsure when he would leave. However, he hoped to go back to his mum's afterwards. The care provider planned to give him wraparound support when he exited care.

Case Study #5

A young man who had been excluded from school at the age of ten, and who had a prolific criminal record, signed his own Section 20 (voluntary care) order. During the Covid-19 lockdown, he was moved into a semi-independent home in an isolated area. He started a new job, but was recruited to work a county line by the people he worked with. He was also involved in other offending, including stealing a toy for his little sister's birthday and hiding it in the home. The staff were seemingly unaware that any of this was happening, or that he was struggling to cope.

The young man was arrested again soon afterwards, and bailed into the custody of his support worker. Though he was placed in another home, this time in a busy urban area, he received little support from social services. At the time we were told about him, he had breached his bail order twice.

Care settings are failing to protect young people

Children’s carers should look after them, protect their welfare and support their healthy development. Yet our research has found that this is not always happening — at least not for vulnerable adolescents. Instead, some care settings place young people at *greater* risk of exploitation. This can happen in two ways:

- young people may be directly at risk within a care setting, through peer recruitment or via staff;
- care providers may be unable to safeguard young people from exploitation outside the home (or on social media), or unable to prevent young people from returning to areas where they are at risk of exploitation.

Each type of risk requires a different response. In the first, the care setting itself is a risky context: it should be flagged in multi-agency meetings, and interventions should target the setting rather than (just) the children living there. In the second, the care setting may be internally safe, but powerless to prevent violence or county lines recruitment in the neighbourhood. In these cases, care providers should be included in work to identify and improve risky local areas. Until the location becomes safer, children with a history of exploitation should not be placed there (see chapter 5).

We have heard some evidence of direct risk from staff in unregulated homes. In Merseyside, community safety officers have built relationships with young people and staff in semi-independent accommodation. Through this, they discovered unsuitable staff working with vulnerable young people — including some with links to organised crime groups.

In other care settings, staff reportedly fail to protect the children they look after. In some children’s homes, we have heard, staff struggle to understand what is happening in the lives of their young people. Case Study #5, which was shared with us by an interviewee who works with victims of criminal exploitation, describes a young person who moved through multiple care settings with little recognition or support. The interviewee went on to describe seeing drug debts chased up in a Merseyside children’s home:

“That’s where county lines starts because you say you owe me and you’re in ... You get a bit of money each day. Some of them depending on what age you’ve got, some of them are allowed to go to work as well. So they can have a little bit more, but the ones who are not and are struggling, you know, you’re gonna get it (cannabis) somehow. And then if they can’t pay, you know, I’ve been in a care home where four lads have run through looking for someone, you know, smashed a care home up getting into a room to one of the lads who’s owed them, and it’s only 20 quid.”

Children's homes were also perceived as risky by staff at a Merseyside women's charity, who had recently begun reaching out to young women affected by county lines. From their experience of the local area, they described two places where exploiters might target vulnerable young people: the local park, where the police routinely used dispersal orders to disrupt drug dealing, and residential care settings.

When a park is linked to youth violence or exploitation, the contextual safeguarding approach suggests that assessment and intervention should focus on the park itself — not just the young people who are affected. This might mean discussing the role of the park during the assessment process; flagging it as a risky setting; drawing together information about the park from different agencies; and training park wardens to build trusted relationships with young people, so that they feel comfortable reporting abuse or asking for help.⁸⁸

The same approach could be applied to children's homes and semi-independent accommodation. Where care settings are home to children flagged for criminal exploitation, a multi-agency team could assess:

- whether young people feel safe enough to report potential exploitation to staff;
- risks in the neighbourhood of the home, including any intelligence about county lines activity from police;
- risks within the setting itself;
- the level of adult oversight.

The increase in out-of-area, private placements has made it harder for local services to understand, and share information about, young people in their area. Social workers do not necessarily know whether the area they are placing a child in is safe, or who will be placed alongside them in a home. Unregulated, semi-independent homes can pass under the radar, accommodating vulnerable children without scrutiny.

The next chapter explains the barriers to information sharing between areas and agencies. These barriers affect all children who are known to multiple services. However, they are especially significant for children who are placed outside their local authority areas. Statutory services want to understand — and so manage — the risks associated with the neighbourhoods and homes which looked after children are placed in. Yet this can only happen if there is a reliable, consistent process for sharing information.

⁸⁸ Firmin, Carlene (2020), *Contextual Safeguarding and Child Protection: Rewriting the Rules*, 168.

5. Borderless safeguarding - a distance left to run

Vulnerable young people are often highly mobile, moving home from area to area with parents and carers, perhaps due to housing pressures or other factors. If they are in care, young people may be moved to residential placements out of their home area, often at great distances from home. Sharing information between local authorities and police forces is essential to inform the plans which agencies must make to keep these young people safe from harm.

Many of the statutory services dealing with vulnerable children were not set up to meet the challenges of criminal exploitation. Children's services have traditionally focussed on children who are abused or neglected within their families; community safety teams focus on hotspots for crime and anti-social behaviour, rather than child welfare within those places; and the education system focuses on children's attainment, attendance and behaviour, channelling young people who struggle in mainstream schools into alternative provision.

As a result when teenagers are groomed and exploited to transport drugs and money across the country, the statutory services responsible for safeguarding them face a number of barriers due to the difficulties inherent in sharing information between administrative and geographic boundaries.

Whether a victim of CCE is in care or not, if they are exploited in county lines they are likely to turn up in other police force areas. Whole families may also relocate because a young person (and, by extension, their family) is at risk of violent retribution. However, teenagers who are placed in private, out of area children's homes — whether they are regulated or not — seem especially likely to fall through the cracks of service provision. In these cases, information sharing is complicated by:

- disagreements about which agency is responsible for, and should allocate resources to, a child living out of area;
- differences in organisational culture;
- inconsistencies in how data is recorded and shared.

This chapter explains how these tensions have set back the safeguarding response to CCE. For this topic, we spoke to experts from across the country — including the National County Lines Coordination Centre — as well as local stakeholders. It is clear that we still have a long way to travel before the system response to county lines can be described as 'borderless safeguarding'.

Moving between areas

When a young person moves between areas, understanding about their life amongst the agencies who are responsible for their welfare becomes fragmented. This is the case whether they are moving to escape risks, to transport drugs or because they have been placed there by their local authority after entering care. If a child goes missing and turns up hundreds of miles across the country, their parents, carers, social workers and teachers lose sight of what is happening to them. If they relocate to avoid risk, they leave behind services, staff and friends who understand their

histories and experiences. If they are given a care placement in another area, information is split between two local authorities.

Unless a child is facing immediate harm and must be moved at once, the placement process includes conversations and information sharing between the two areas. When a child is placed away from their home area, a social worker in their home authority fills out a placement request form detailing the child's history, their strengths and needs, their education and their health. The host authority receives their care plan, and may request court bundles from children's care proceedings (though some placing authorities will say that they have to go to the court for it). Unless it is an emergency placement, social workers at each authority are also supposed to have a detailed conversation about the placement and the child.

However, the placing process cannot fully manage contextual risk. This is because:

1. The placing authority does not decide which other children are placed in the same home. If a child with a history of CCE is placed with other children who are known to be involved in county lines, and the home is not equipped to deal with that risk, local authority social workers have no way of knowing (unless they are told by the home or the child).
2. Local authorities do not routinely consult police about known risks in the area of the placement — for example, whether the structure of the local drug market could pose a recruitment risk, increasing the child's vulnerability to county lines exploitation.
3. The host authority may find out about a child's history of exploitation through a Multi-Agency Child Exploitation (MACE) meeting. However, MACE meetings take place only after a placement has been made. They also depend on police sharing information across force areas.

At the moment, this process depends on chance, good practice, and the professional curiosity and commitment of individual social workers. We believe that it could be improved by introducing an additional, pre-placement risk assessment for criminal exploitation. Figures 22 and 23 summarise the existing system, and how we think it could be changed.

Figure 22. The current system

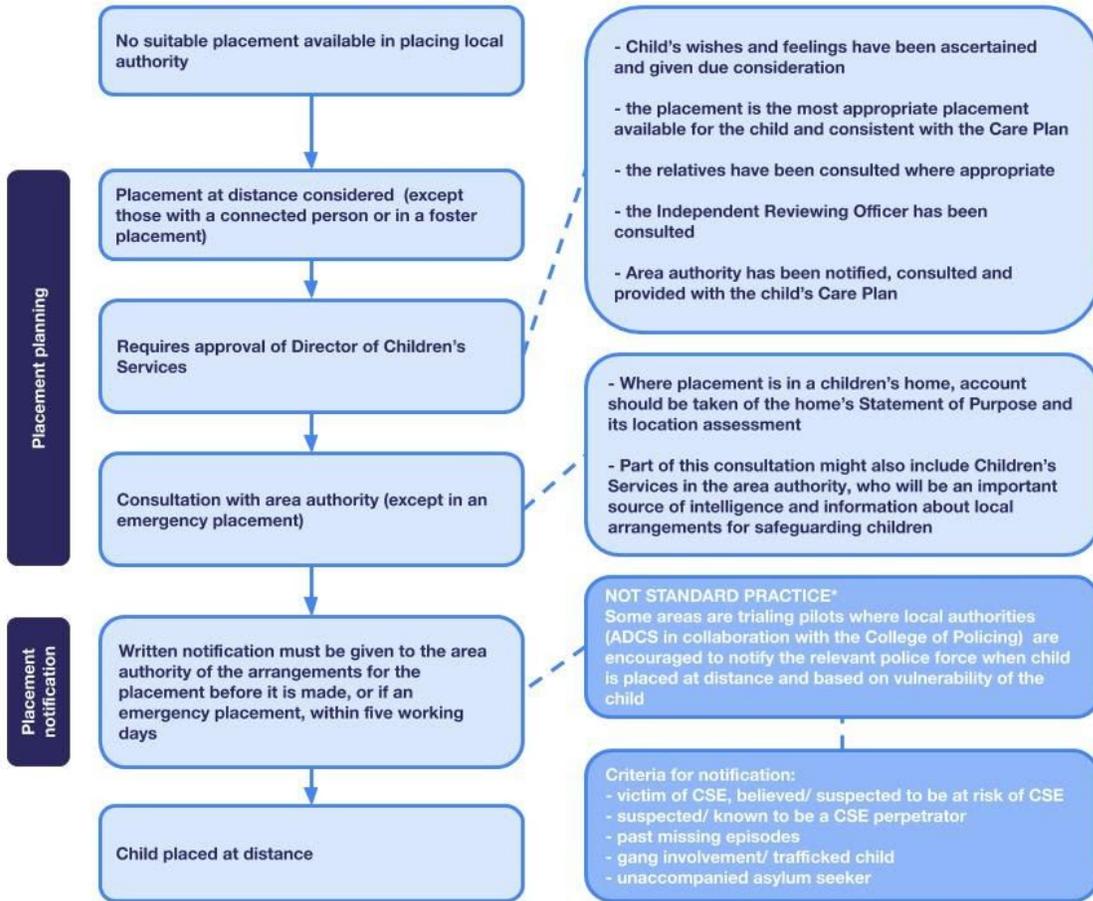
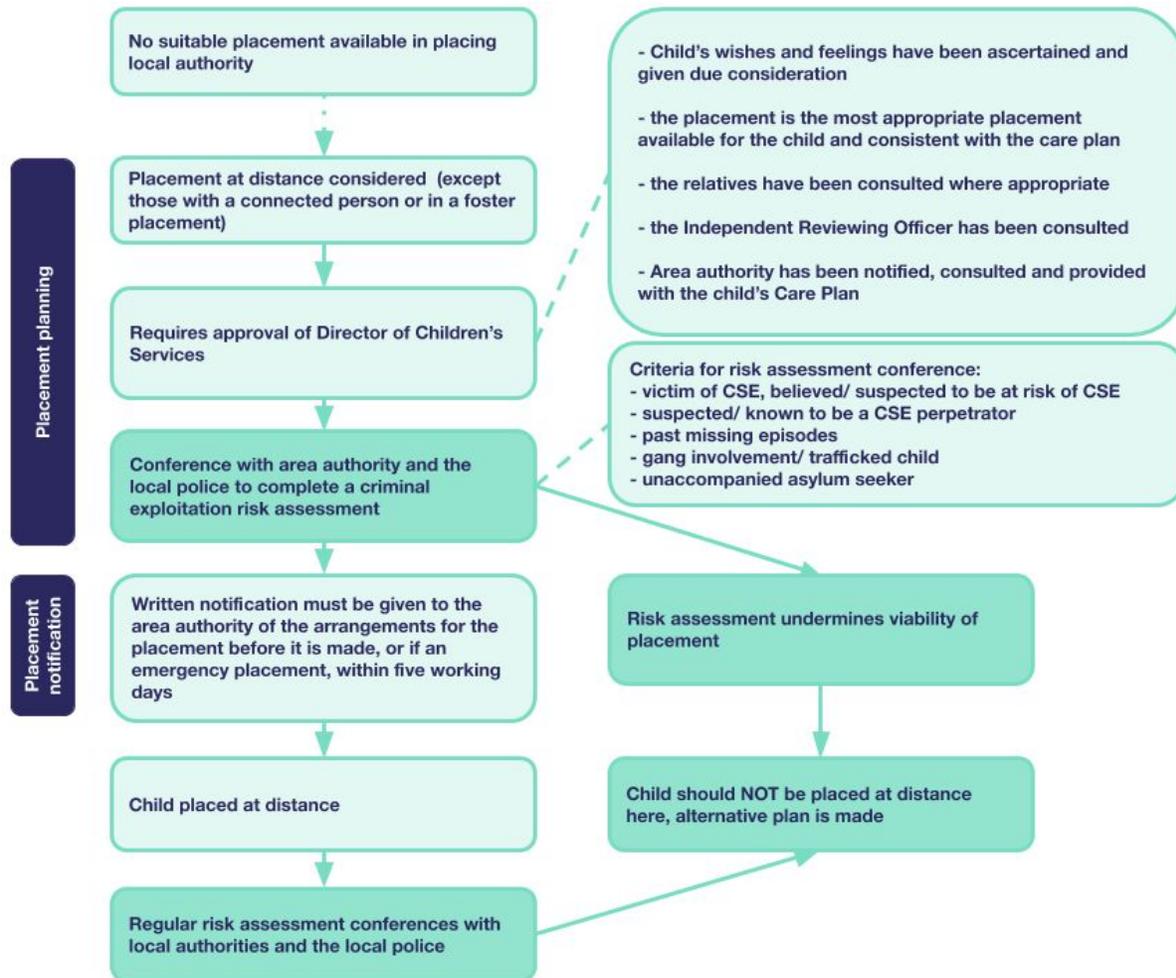


Figure 23. The system with an additional, pre-placement risk assessment



However, this model would not solve long-running territorial and administrative disputes about which agency in which area is responsible for various aspects of the lives of vulnerable children. In our interviews with police and children’s social care staff, we heard that missing episodes were especially likely to cause tension. In the words of a local authority social worker: *“When a child who has been placed in another area goes missing, that then becomes a bit of a battle about who needs to pick up or maybe put resources and income [into] looking for that child.”*

If police forces and local authorities are busy arguing over who should help a missing young person, they are likely to miss a key chance to safeguard victims of CCE. As Chapter 3 showed, exploitation is significantly linked to missing episodes. They are also an important opportunity to intervene. In their review of twenty-one cases where a child was harmed through criminal exploitation, the Child Safeguarding Practice Review Panel described ‘critical moments’ where a

child's risk could have been recognised and reduced.⁸⁹ Missing episodes were one of these moments.⁹⁰

Case Study #6

Police targeted a county line running from Merseyside to a local authority in North Wales. The local Safer Neighbourhoods team found that five looked after children, aged 15—17, were transporting drugs to North Wales. Some were living in care homes and some were living in foster homes. Neighbourhood officers took these young people into police protection, then handed them back to their home authority's social services.

Later, the team received intelligence that young people were being re-exploited when they returned to Merseyside children's homes. However, they did not have the responsibility or time to do anything about this themselves, especially as the young people in question did not return to the same part of North Wales.

When a missing child is found, their local authority is meant to provide a return home interview — a chance to find out what happened and whether they need additional support. If a child has been placed out of area, their home authority is responsible for providing this interview. Information about the child's experience is not necessarily shared with the police force or local authority which they are living in. When we spoke to interviewees from North Wales Police about this process, they described it as fragmented and problematic:

⁸⁹ The Child Safeguarding Practice Review Panel (2020), *It was hard to escape: safeguarding children at risk from criminal exploitation*.

⁹⁰ Waltham Forest Safeguarding Children Board (2020), *Serious Case Review: Child C*.

North Wales Police Interviewee #1: “If a child is from Merseyside or lives in Merseyside looked after, the only time we know that they’re here is when they’re arrested. From our point of view, that’s not our missing child. What we certainly don’t do from a missing point of view, if a child from St Helens is placed in North Wales, which is not unheard of, quite frequent — they go missing on us, we start the report, we’re quite confident this child has gone back to St Helens. We will now transfer that to St Helens, we close that, don’t chase up, we’ve closed it, that’s not our problem any more. They’re not our child, they just happen to live here. Even LAs [wouldn’t necessarily chase it up]. I think there’s a problem there.”

North Wales Police Interviewee #2: “We wouldn’t know if they had a return home interview, and even if they did and said there’s a county lines issue, that wouldn’t be passed onto North Wales. And it isn’t just us, every force is having the same problem. There’s a huge intelligence gap with those children.”

North Wales Police Interviewee #1: “Within North Wales, all bar two local authorities have said that they will only conduct return home interviews for their children, their looked after children specifically. When you go back to the stats of, we’ve got more out of area children in North Wales than we do our own, we’re missing a huge picture there.”

As this last quote suggests, many missing children do not get a return home interview at all. In the English local authorities which neglect their statutory duty to provide return interviews after a missing child is found, and in Welsh local authorities where there is no statutory requirement to provide them, the police ‘safe and well’ check may be all that a child who has gone missing receives.⁹¹ Police have told us that this might mean nothing more than visiting a child in the home which they have returned to, noting down any visible signs of harm, and asking questions which are met with silence or the child telling them to leave.

These issues can only be solved through multi-agency working, within a structure where different agencies are clear about their respective responsibilities. In the contextual safeguarding model, this structure is a multi-agency partnership which is led by — and draws its values from — children’s social care.

Organisational cultures

The response to CCE brings together multiple agencies. Local authorities have developed multi-agency structures, from MACE meetings to co-located ‘hubs’. Sometimes, these structures bring together a wide variety of services. In the London borough of Hackney, for example, an

⁹¹ The Children’s Society (2013), *Here to Listen? Return Interviews Provision for Young Runaways*.

Extra-Familial Risk Panel coordinates safeguarding for children who are at risk of exploitation. The panel includes staff from children’s services, housing needs, the integrated gangs team, the Metropolitan Police, Child and Adolescent Mental Health Services (CAMHS) and the NHS.⁹²

Figure 24. Structure of the Knowsley Shield team⁹³



In Merseyside, agencies work together via MACE meetings and specialist teams. The Knowsley Shield team (Figure 24) brings together police, children’s services, the Multi-Agency Safeguarding Hub and a commissioned exploitation service. Where a child is found to be at high risk of exploitation or is already being exploited, the team also notifies Community Health, the School Attendance Service and the police.⁹⁴

As information about CCE is held by multiple services, and as exploited young people are likely to need support in a variety of settings (for example, at home, in their schools and in their neighbourhoods), multi-agency working is crucial. Yet policing, social care, housing, health, education and third-sector agencies have different organisational cultures and perspectives. In the contextual safeguarding pilot sites, the researchers at Bedfordshire found that:

⁹² Hackney Council (2019), *Hackney Extra-Familial Risk Panel Protocol: Guidance for Multi-agency Partners*.

⁹³ Taken from https://knowsleychildcare.proceduresonline.com/pdfs/shield_team.pdf.

⁹⁴ Knowsley Safeguarding Children Partnership (2020), *Preventing and Tackling the Criminal Exploitation of Children, Appendix 3: CCE Process*.

“Most localities that were worked with had a ‘locations’ meeting, or community safety panels, who sat and identified locations in which anti-social behaviour or crime was a concern. These meetings were focused on crime reduction or crime prevention in local areas, and rarely fed into child welfare focused meetings on child sexual exploitation or serious youth violence. Even on occasions where there was some join-up between the two structures they didn’t share the same tone, culture, and measures of success. In one meeting, young people were being described as problematic, anti-social, and a risk to the local community; in another meeting they were described as experiencing adversities, vulnerable, and at risk in their local community.”

— Firmin, Carlene (2020), *Contextual Safeguarding and Child Protection: Rewriting the Rules*, p. 86.

CCE is a challenge for both policing and social care. In the face of scarce resources, high thresholds and an organisational culture which prioritises young children, children’s services have struggled to recognise and prevent exploitation.⁹⁵ A police analyst in North Wales explained that in one of their local authorities, *“boys from out of area were placed in a home and seemed to create, for want of a better word, a gang — but we recognised that, rather than the [placing] local authority pointing it out to us”*. In cases like these, police may pick up on exploitation which has gone unnoticed by children’s social care.

However, criminal exploitation also challenges deeply-held assumptions within the criminal justice system: assumptions about vulnerability, victimhood and offending. In our research, we learnt that the criminal justice response to CCE remains uneven and, in some ways, contradictory.

In both of the areas where we carried out research, police safeguarding and missing leads work to identify and support victims of CCE. However, sustained support needs to come from children’s services and/or third-sector agencies, not from the criminal justice system. A young person may want to exit county lines activity, but refuse support which is offered by police — not least because they do not want to be seen cooperating with them. As a senior officer explained to us, campaigns about CCE will be poorly-received if they come from the police:

⁹⁵ Firmin, Carlene (2020), *Contextual Safeguarding and Child Protection: Rewriting the Rules*; <https://www.communitycare.co.uk/2018/12/21/werent-set-deal-councils-responded-county-lines/>.

“If I’m wanting to deliver those types of messages here in Liverpool, even parts of Cheshire, North Wales to these kids, they don’t want to hear from a police officer ... There’s a lot of third sector organisations out there for people who’ve got that lived experience. You know, when they’re delivering those messages then kids will, you know, sit up and listen. And actually it’s delivering the right message and giving that option to go, you know, because our aim is to, one, stop getting them drawn in in the first place. But actually those who are drawn into it, [we want to] offer to give them a pathway and give them an opportunity to get out. We do not want to criminalise these people. We want to help them. So it is all around that delivery of the right educational packaging programme.”

If young people associate the police with unfair treatment, they are especially unlikely to view them as a source of education or help. For example, a young man who had been involved in county lines told us that the police are too quick to view groups of young people as gangs, and criticised the use of stop and search against black teenagers. He felt that young people would benefit the most from peer mentoring: this would help them to understand that *“there’s always another way, another life outside that one”*.

Near the start of this project, we held a series of focus groups to discuss the response to CCE across the UK. In these discussions, we heard about significant variation between areas. Some police forces were able to recognise CCE and adopt a safeguarding response, but others were not. One social worker explained that children in her London borough were transporting drugs to a nearby, more rural county. She felt that the police there failed to recognise CCE, prosecuting even children who had been successfully referred to the National Referral Mechanism — i.e. children who had been recognised as victims of modern slavery.

In this example, the force had not misunderstood the law; CPS guidance allows police to prosecute children with a positive NRM. For some focus group participants and interviewees, this — and other problems with the NRM — epitomised the failings of the current system. We were told that the NRM is *“useless”* for CCE victims: it does not give children any additional support, and does not protect them in or outside of court.

Though an NRM does not itself protect a child from prosecution, a CCE victim (or their lawyer) can invoke Section 45 of the Modern Slavery Act. Section 45 provides that a young person is not guilty of an offence if:

- they committed it as a direct result of modern slavery or exploitation;
- a reasonable person in the same situation, with the same relevant characteristics, would also have committed it.⁹⁶

During our deep dive research, one police officer told us that he could think of multiple examples where children had used Section 45. However, none had been upheld. He linked this to the

⁹⁶ <https://www.legislation.gov.uk/ukpga/2015/30/section/45/>.

victim/offender overlap: *“When you look at their background they’ve been involved in criminality six, seven years, they might have been criminally exploited six years ago but they’re now entrenched.”*

If services fail to intervene early in a child’s offending history, they may no longer be considered a victim by the time they seek and receive help. As a result, it is crucially important that other statutory services — social care, education, health — recognise exploitation before it becomes a police matter, and that the youth justice system helps children to reduce their offending rather than becoming *“entrenched”*.

Recording and sharing information

For this project, we analysed police force data from our two deep dive areas and spoke to their dedicated analysts (see Chapter 3). In the process, we learnt how forces record and share information about both CCE and looked after children. Until recently, the National County Lines Collection Matrix did not include an option for care status. We have found evidence that at a local level, flags for both care status and CCE are used inconsistently, varying between (and even within) forces.

These inconsistencies make it harder to assess the relationship between care settings and CCE. For example, we found that when police manually checked whether the addresses which children had gone missing from were care settings — instead of relying on pre-existing care flags — a higher proportion of CCE victims were found to be looked after children.

Forces routinely share intelligence about, for example, an offender’s history of arrests elsewhere. However, this information is neither nationally coordinated nor shared internally. Within police forces, intelligence, safeguarding and community safety hold different information. While public protection officers are used to sharing information internally and externally (e.g. with social care, education and health partners), crime investigation teams *“just don’t have that inbuilt trust in partnership working in their psyche”*. This disconnect is illustrated by Case Study #7.

Case Study #7

A neighbourhood police officer was called out multiple times to intervene with a seventeen-year-old who was accused of criminal damage on his estate. After visiting his flat and finding that it was overcrowded, she filed a vulnerable child report (triggering a referral to children’s services). Later, when he was arrested within her force, she found out that he had been repeatedly arrested in another police force area — hours away from his home — for involvement in county lines. This information had been passed between intelligence teams in the two forces, but it had not been proactively shared with officers on the ground.

At a national level, forces can share information about CCE using vulnerability tools. Since Operation Denver, the first major ‘end to end’ police operation against a county line, police forces

have used vulnerability tools to record and disrupt exploitation. Op Denver sought to disrupt a county line which ran between the London Borough of Enfield and Swansea in South Wales, operated by a gang calling themselves 'Dem Africans' (DA). To track the movement of young people exploited within the line, Denver piloted the use of a new vulnerability marker for children in Enfield.

The tool enabled professionals to record known vulnerabilities, so that when those young people were found by the police in Swansea, officers were able to trigger an alert with colleagues at the Met. It enabled the police to build up an intelligence picture which could be used to pursue modern slavery charges against elder gang members, whilst also supplying the local authority with information that could be used to safeguard young people missing from home or care.

The new vulnerability marker was later added to the Police National Computer. The Home Office's Serious Violence Strategy, launched in April 2018 by then Home Secretary Amber Rudd, contained a 'County Lines Action Plan'. The centrepiece of this plan was establishing a National County Lines Co-ordination centre (NCLCC), led by some of the key players in Denver.⁹⁷ This Action Plan also confirmed that after a successful pilot, the new vulnerability marker would be added to the PNC. Although this action was marked as 'completed', the vulnerability marker was not in fact widely used by police forces or local authorities at that time, although they could choose to use the assessment tool if they wished.

Since their official mobilisation in 2018, the National County Lines Co-ordination Centre (NCLCC) have fought a determined battle to improve data sharing between partners with the explicit goal of disrupting the exploitation of young people in county lines, forcing older gang members to break cover and ultimately face arrest and prosecution. In the absence of any national legislative framework or strategy for CCE, the NCLCC have exercised influence through persuasion. As a result, 23 out of the 43 police forces use the vulnerability tool. The NCLCC intention is that this tool should be used as a 'passport' which agencies can use to access important information about vulnerable young people they encounter. The number of local authorities using the tool is unknown.

Yet the vulnerability tool has not been enough to transform the response to CCE. In the absence of a national strategy, we have heard about a patchwork of different approaches to labelling, tracking and measuring vulnerability. One senior police officer interviewed as part of this project gave the example of a police force area in which five constituent local authorities were all using their own unique tools to flag CCE, each of which was different from the tool used by the police.

Case Study #8

During a drugs expert course, a community safety officer from North Wales Police mentioned their work on county lines to an officer from somewhere else in the UK. They then discovered that a young person with the same name had also been stopped in that force. This information was shared only by coincidence.

⁹⁷ This was funded by a Home Office underspend.

We have found that information sharing between agencies — placing and host authorities, different police forces, police and social care — is too often left to chance. The process is hampered by disputes over responsibility, poor data management, and misunderstandings about GDPR. It is also complicated by organisational cultures and assumptions which do not easily accommodate the response to CCE.

However, we also found that our interviewees wanted things to be done better — and had concrete ideas about how this could be achieved. They wanted information to be shared across agencies and areas, with consistent recording practices and a reliable notification system. They also wanted the risks around potential placements to be recognised, communicated and understood.

Both of these ideas are achievable. If relevant information was shared before children were placed, inappropriate placements for children who are at risk of exploitation could be avoided (see Figure 23). If there was a national legislative framework for CCE, information recording, sharing and notification could be standardised. As a result, the type of data described in Chapter 3 could be systematically recorded, shared and acted on.

6. County lines and Covid 19 – a natural experiment

Practitioners and experts agree that there has been a shift towards grooming and recruiting vulnerable children in the dealing bases of county lines in order to meet the labour requirements of county lines. At the beginning of 2019, the National Crime Agency described the recruitment of children from importing areas as ‘an emerging trend’.⁹⁸ When the St Giles Trust launched a county lines pilot project in Kent in 2018/19, they found that 85% of their referrals were from the local area.

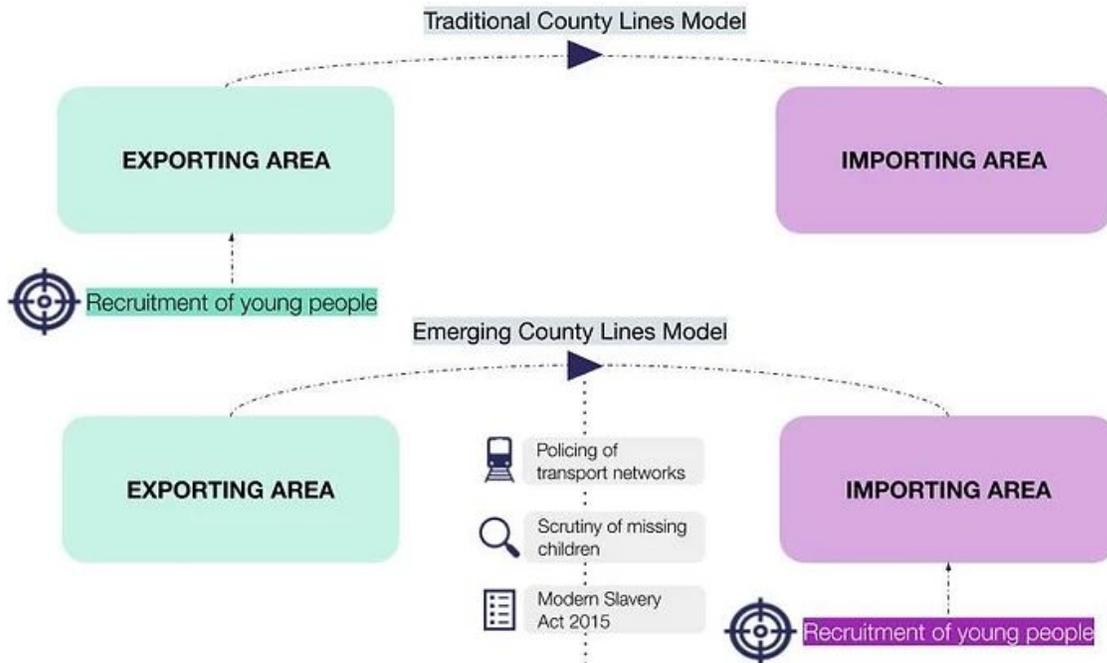
Police tactics, such as use of automatic number plate recognition, operations by British Transport Police on the rail network and heightened scrutiny of missing children from ‘exporting’ urban local authorities, has constrained the ability of gangs to transport young people hundreds of miles with drugs, money and weapons. The use of modern slavery legislation against elder gang members has given them a stronger incentive to create greater distance between themselves and the dealing bases in their county lines.⁹⁹

Data from North Wales suggests that the ‘traditional’ model of county lines exploitation — with child drug runners recruited in an exporting area — continues to exist. However, children are also increasingly recruited in the county base itself. One senior police officer suggested that the picture has recently become even more complicated: some Merseyside exploiters now recruit children from neighbouring counties, like Cheshire or Lancashire, to transport drugs to North Wales or another importing area.

⁹⁸ National Crime Agency (2019), *County Lines Drug Supply, Vulnerability and Harm 2018*.

⁹⁹ St Giles Trust (2019), *Evaluation of the County Lines Pilot Project*.

Figure 25: Traditional and emerging models of county lines exploitation



County lines under COVID - a natural experiment

Covid-19 presented us with the opportunity to study how the elders, gangs and OCGs who operate county lines would react to the lockdown in adapting their methods of recruitment, management, marketing and distribution to maintain their revenues and market position, and how these adaptations changed the patterns of exploitation. This 'natural experiment' offers a fascinating and hopefully instructive perspective on how the more successful adaptations to lockdown may shape exploitation post-Covid and how law enforcement and local authorities might adapt their methods in anticipation of those changes.

The recruitment of young people in the market towns and seaside towns targeted for county lines, through peer-to-peer approaches or social media advertising and through urban gangs working more closely with local gangs, was already transforming the traditional county lines model into something more like a local franchise operation in the pre-Covid world. Milton Keynes, Ipswich and the Medway towns were early victims of this local recruitment method, with postcode gangs of the type seen in London boroughs a decade ago forming around these new local 'franchises'.

After the COVID-19 lockdown began, the received wisdom reported in the media was that the threat from county lines operated by organised crime groups (OCGs) and gangs would reduce. However, during the first lockdown, the picture appears to have been far more complex. The gangs who operate county lines have always proven highly versatile and adaptable. During lockdown they displayed an ability to embrace new tactics in order to protect lucrative drugs lines.

Significant reductions in the number of children reported missing from home or care during lockdown have been cited as evidence that exploitation through county lines reduced due to the lockdown. On the surface this makes sense, as it seems obvious that exploitation of vulnerable children and in county lines drugs networks may be easier to disrupt during the COVID-19 lockdown due to increased visibility of young people in public spaces or on public transport.

Missing children: Lower volume did not necessarily mean lower vulnerability

Children go missing from home or care for a variety of different reasons. They may want to spend time with a girlfriend or boyfriend, they may argue with their parents or carers. If they are in the care system, they may run away from their placement and return to their home area. The real issue is whether the young people who have been assessed as being vulnerable to exploitation are still going missing - and here the picture is more mixed.

Rescue Response (a London based county lines service funded by MOPAC), have been collating intelligence from a variety of partners. Some London boroughs have reported to the Rescue Response project that although the number of missing children has dropped significantly since the start of the lockdown, many of the most vulnerable young people are still going missing.

However, some boroughs reported a noticeable increase in the length of missing episodes during lockdown, possibly because young people transported to trap houses are having to stay there for longer due to increased demand and lockdown restrictions.

These reports are consistent with data shared with Crest by an inner London borough. That borough's 'missing' data shows thirteen children reported missing since the beginning of the first lockdown, compared with 39 children in March alone in 2019. A huge reduction in volume – but closer examination of this small sample of missing children tell a different story. These thirteen children were between the ages of 14 and 17 years old; eight were in care, four were children in need. Just one had no social care status. Eight of the children had known links to gangs, eight had 'tags' for exploitation, seven had prior involvement in serious youth violence, and five had known links to county lines.

This shows that although the number of children going missing decreased drastically during the first lockdown, those who were still going missing were some of the most vulnerable in that borough. The number of children missing in the borough was lowest in the first week of lockdown and highest in week four – suggesting that worryingly the ability of parents, carers and residential children's homes to 'hold the line' on lockdown weakened over time.

The move towards local recruitment described in Figure 25 (above) means that in assessing whether children are being exploited in county lines during lockdown, we should pay as much

attention to vulnerable children in the ‘county bases’ as those going missing from the ‘home bases’.

‘Importing areas’ for county lines are seeing similar patterns of reductions in missing children. Comparing the data from April 2019 and April 2020 in North Wales shows a dramatic change, with a reduction of two thirds in the number of missing children and only one child reported missing twice or more, with few missing incidents lasting more than 48 hours.

Figure 26. Number of missing incidents involving children in North Wales (April 2019/2020 comparison) broken down by care status

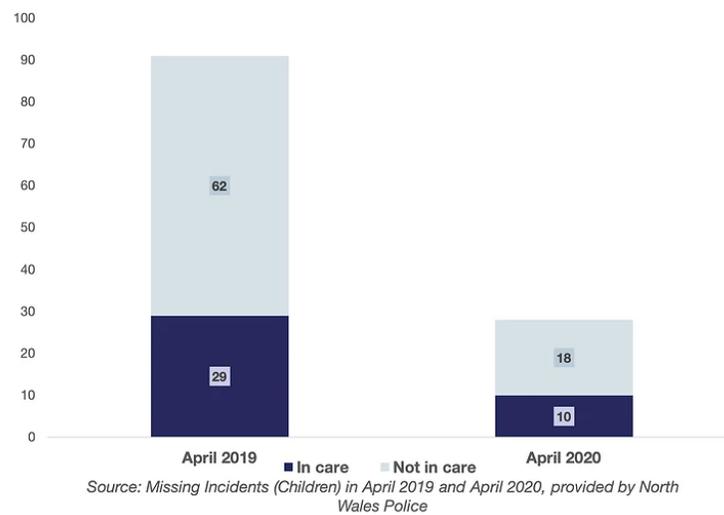
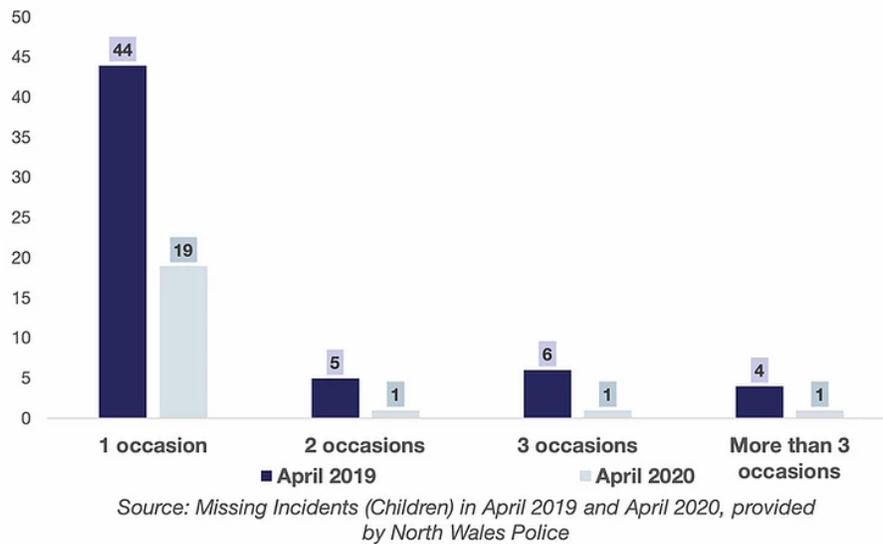


Figure 27. Number of occasions where a child went missing in North Wales (April 2019/2020 comparison)



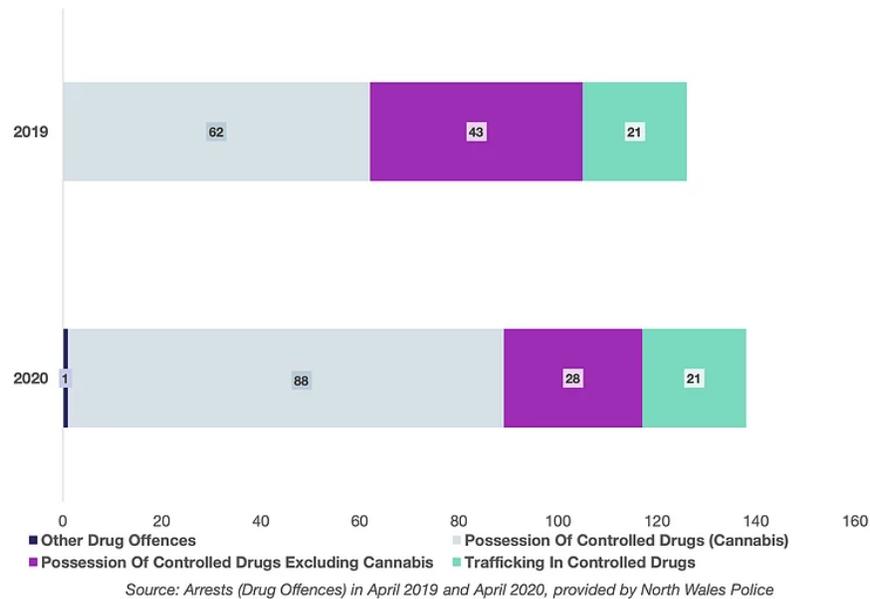
However, local recruitment allows gangs to game the system to avoid triggering missing reports. The young person they exploit may be able to leave their home or care placement in the morning, sell drugs and return the same day, before they are officially reported missing. Workers at one leading charity in North Wales told us that their caseload of young people involved in county lines were predominantly from the local area, yet had been recruited by gangs based in Merseyside. Several national children's charities have advised us that the systems around children going missing from homes or care remain beset by weaknesses of which gangs are well aware.

Rescue Response also received reports that gangs redeployed runners previously used on county lines to deal within London instead. This may explain the overall reduction in reported missing episodes, despite continuing exploitation at a local level. Partners have reported that young people are being provided with taxis via apps (such as Uber, Bolt and Kapten) in order to make longer journeys. Taxis continue to be used by dealers and networks for deliveries.

[Demand for crack and heroin remains buoyant in county bases despite lockdown](#)

Whilst the missing incidents figures for North Wales show even steeper reductions than those in London, the data shows only a slight fall in recorded drugs offences, suggesting that the local drug market functioned largely uninterrupted during lockdown. Though demand for needle and syringe clinics fell sharply at the end of March in North Wales when lockdown policies were first introduced, it subsequently returned towards usual levels.

Figure 28. Number of drug offences in North Wales (April 2019/2020 comparison) broken down by offence type

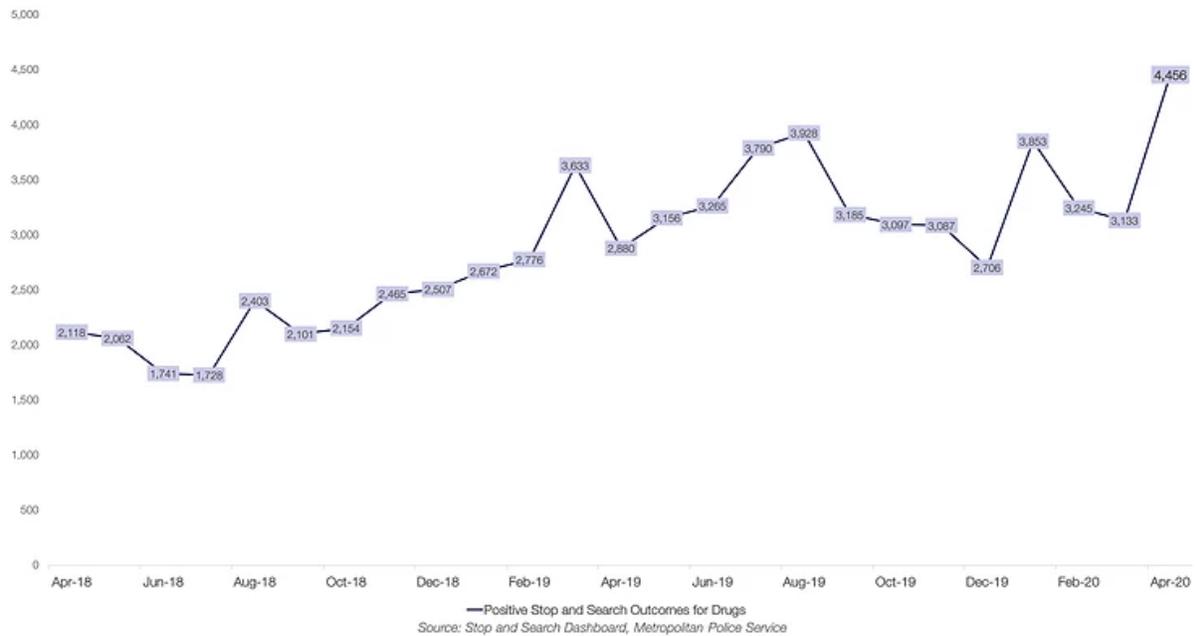


In theory, a ban on non-essential travel should make it easier to spot children who are moving drugs across the country. There is some evidence to bear this out. More people and vehicles were being stopped by police during the first lockdown and the rapid drop in other forms of crime reportedly left more time for proactive work against dealers.¹⁰⁰ Similarly, Metropolitan Police data shows an increase of 42 per cent in positive stop and search drug outcomes since March, showing perhaps both the buoyancy of the drugs market but also the increased visibility of offenders.

100

<https://www.independent.co.uk/news/uk/crime/coronavirus-lockdown-county-lines-drugs-street-police-arrest-a9473301.html>.

Figure 29. Positive stop and search outcomes for drugs in London



No county lines furlough

The market for illegal drugs in the UK is substantial (worth around £10bn a year). There is no clear evidence that demand for crack and heroin declined during lockdown and by retreating from the market, even temporarily, gangs risk ceding territory to rival groups. The operators of lucrative county lines were heavily incentivised to modify their patterns of recruitment and exploitation, embracing new methods of transport, distribution and retail rather than putting their drugs lines on furlough.

Some were clearly more successful than others in this respect. There are reports of senior gang members breaking cover, forced to get their hands dirty to maintain their business. British Transport Police reported that they were able to disrupt large numbers of young people on the rail network. This shows the desperation of some of the more chaotic disorganised gangs to maintain their position and profits in the early days of lockdown. A number of police forces, such as West Midlands also used the opportunities lockdown has presented them with to make proactive drug seizures as some of their key targets became easier to find closer to their product and proceeds.

The charity Missing People, who engaged with the police on a regional basis during lockdown, told us that they heard evidence of increased drug dealing in 'liminal spaces' such as railway land, car parks and abandoned industrial buildings. Consequently, the decreased visibility of young people involved in drug dealing in many areas during lockdown may not paint the full picture.

Police and practitioners also told us some gangs responded by reviving tactics of the 'old school' such as employing 'user-dealers' to navigate the lockdown. However, for obvious reasons,

user-dealers are a notoriously unreliable and chaotic workforce in comparison with vulnerable adolescents who are easier to manage and control.

Another tactic used by gangs in both county lines and local lines is 'stacking', whereby the drugs line will put out a 'burst' marketing message to their customers, telling them to be in a certain place at a certain time. Once a large group of customers has assembled, a dealer will arrive, on a bike or in a car, and complete a large number of deals. This is a risky tactic, as it is highly visible and attracts attention from local people watching from their homes. The dealer must complete their business within a ten to fifteen minute window to avoid arrest. In a Covid-19 context, contact with large groups of dependent drug users presents an infection risk for both dealer and customer, as does the practice of dealers storing wraps in their mouths.

[A new operating model post-COVID-19?](#)

Whilst many of the tactics and 'swerves' adopted by the OCGs and gangs who run county lines seem likely to be time-limited to the Covid-19 lockdown, others may endure, helping gangs to refine their model post-Covid. Our conversations with police, children's services practitioners and experts indicate that the lockdown helped OCGs refine their use of tactics and tools which allow older gang members to groom and exploit vulnerable young people whilst also streamlining the marketing and distribution of their products — at every step creating greater distance between themselves and their dealing bases. The money flows back up the line, whilst the risk travels downward.

Practitioners told us that gang elders are increasingly finding opportunities to groom children by using exploited teenagers to recruit their peers through the use of end-to-end encrypted apps such as WhatsApp, Instagram, Telegram and more recently Wickr. The use of social media is already a core part of the county lines model, used to market the availability of drugs, recruit and groom young people and arrange deals.

As the technology develops so too will the opportunities for exploitation, away from the eyes of law enforcement and social services. Police officers in Lancashire described to us how networks of young people in different children's homes in different towns, with no obvious way to know each other, were going missing simultaneously. These invisible networks of vulnerable looked after children pose a huge challenge to traditional safeguarding methods.

Ever since county lines came to national prominence four years ago, it has seemed that the authorities have been one step behind the gangs, fighting the last war. Perhaps then, the most significant insights we can draw from the response of county lines to the lockdown is to focus on those elements that provide a line of sight towards the future patterns of exploitation post-COVID.

Anne Longfield, the Children's Commissioner for England, has warned that the lockdown is likely to have increased children's vulnerability, with harmful medium and long-term consequences. There

has been a reported surge in domestic abuse (which, a recent report by the Victims Commissioner finds, is a significant risk factor in creating vulnerability that leads to future exploitation). As school attendance has a protective impact on vulnerable children, the low numbers attending school — though schools were theoretically still open to them — set alarm bells ringing.

Young people have been particularly affected by increase in unemployment as the economy suffers due to the impact of the COVID-19 pandemic. The unemployment rate rose to 13.6% in September for people aged 18-24, compared to 4.8% for all economically active people.¹⁰¹ The draw to earn money as part of county lines, or more widely organised crime, may implicate more adults in a tougher economic climate. As the county line model evolves, robust datasets, reliant on data collection and data sharing, will be key to understanding the risk profile to vulnerable individuals and adapting the service response appropriately. As it stands, services, nationally and locally, should not be confident they have such a rich picture.

A major challenge is assessing how much is happening in silence, behind closed doors. Child protection referrals have halved in some parts of the country. Police and third sector agencies have described their fears that some missing episodes are no longer being reported, because parents or carers are afraid of being fined for a breach of lockdown rules. For those who do still go missing, the safeguarding response (safe and well checks, return home interviews) is now carried out over the phone. This means that nobody external sees the state in which a child returns.

The market for illegal drugs is a multi-billion concern, and it should not surprise us that the most organised and successful players in that market will learn from and mimic retail trends in the wider economy. The shift from the high street to online delivery for both food and consumer durable goods presents an opportunities for drug lines to operate covertly both in terms of resupplying local bases and delivering drugs to consumers. This has been a growing feature of the drug market over recent years and is likely to accelerate. Runners and dealers disguised as key workers and supermarket workers have been reported during lockdown, but the pre-Covid tactic of using fast food delivery drivers and white van drivers is likely to become increasingly important during and after Covid, allowing drugs lines to operate in plain sight.

Those charged with identifying and disrupting county lines should not continue to make the mistake of underestimating their opponents. Amongst the operators of county lines there are some highly organised and professional entrepreneurs who will respond to the constraints imposed by the tactics of their unofficial regulators, the police, and employ the most up to date methods of advertising, recruitment, management and distribution to maximise their profits. As the more disorganised and chaotic players fail to adapt and are shut down and imprisoned, it's inevitable that those who wish to survive and grow their business or to enter the market will learn from the leading players, who themselves will be scanning the horizon for the next set of innovations that to

¹⁰¹ Office for National Statistics (10 November 2020), *Employment, unemployment and economic inactivity statistics*.

increase their profits whilst becoming ever more distant from the exploitation and violence they beget.

7. Conclusions and recommendations

The exploitation of children in county lines drugs networks is an archetypal ‘wicked issue’. It presents us with a multidimensional problem, the complexity of which makes it difficult to envision an identifiable stopping point. County lines exploitation cuts across a variety of policy areas; criminal justice, housing, health, education and children’s social care. The response of statutory agencies in tackling county lines exploitation is further complicated by the difficulty of working between geographic boundaries, in addition to the existing administrative boundaries. Indeed, the difficulties agencies have traditionally faced working across borders is likely to have been an important enabling factor in the growth of the exploitation of children in county lines. This is particularly worrying in considering the risks to looked after children, perhaps the most vulnerable group within the county lines cohort.

A failure to care

The phrase ‘corporate parenting’ refers to the collective responsibility of councils, elected members, employees, and partner agencies, for providing the best possible care for children taken into their care. The key test of corporate parenting is this: *‘Is it good enough for my child?’* The failure to provide suitable accommodation close to home for the growing cohort of vulnerable adolescents in care demonstrates we are failing that test.

This continuing systemic failure to provide suitable accommodation for vulnerable adolescents places them in networks of similarly vulnerable looked after children and within the orbit of criminal gangs. As a consequence there is a serious concern amongst experts and professionals that the experience of care may amplify rather than reduce the risks they face of serious harm.

Given the amount of money spent on accommodating these young people and the hours of time required from professionals to keep them safe, it doesn’t seem that protecting vulnerable adolescents in care from exploitation is a question of resources, but more one of accountability. Who will take responsibility for helping them transition safely to adulthood? Is it right that they are often placed in accommodation hundreds of miles from home? How can we strike a balance between ensuring their short term physical safety and having long term plans in place that enable them to build a life for themselves and escape the gravitational pull of organised crime?

Police officers working on county lines operations we spoke to told us of cases in which highly vulnerable looked after children, many of whom had come into care because of previous exploitation and extra familial abuse, were placed in accommodation in their police force area only to go missing after subsequent exploitation. Those children were then placed back into residential accommodation and re-exploited elsewhere. We have also heard troubling accounts of young people in this position who go on to groom and exploit others in turn.

Lack of coordination

The amount of police enforcement activity against county lines has increased markedly in recent years. There can be little doubt that the intensification weeks have had an impact on the gangs and OCGs operating lucrative lines, as have police operations run during lockdown and operations under operation Venetic, using intel from the Encrochat hack. This is welcome, but has this enforcement activity been matched by a commensurate effort to safeguard the vulnerable children swept up in county lines and looked after children?

The Home Office have cited the fact that over 1500 vulnerable people were safeguarded during intensification weeks in 2019. However, when asked, the National County Lines Co-ordination centre and the NCA were unable to tell us how many of these were looked after children — and just 69 NRM referrals were made.¹⁰²

In our interviews, we have repeatedly heard concerns from national experts and frontline practitioners that looked after children placed at distance from their home area are at risk of exploitation — yet when they are trafficked and exploited the response is slow and disjointed. Despite the fact that those children access health, education and criminal justice services in the area they placed, the host local authority have no responsibility to them, other than possibly through their youth offending service — even though these children are amongst the most vulnerable in their area, are accommodated in accommodation alongside local children, and attend local schools. These local authorities will justifiably point out that it is unfair to ask them to take responsibility for looked after children placed in their area from other parts of the country because they lack the necessary resources.

However, when a child placed from ‘out of area’ is known to have been exploited such territorial and administrative arguments are a distraction to protecting the welfare of the child and safeguarding the other children and young people in their orbit.

Now the NCLCC have added a marker for looked after children onto their county lines flag, this data will be available in the future, helping to quantify the scale of the problem more accurately, if the tool is used appropriately and routinely by officers. However, the question remains: when a child receives a ‘safeguarding response’ after being exploited in county lines drugs networks, what package of support will they receive and what are the outcomes for them months and years later?

Given the relationship between children’s social care and county lines exploitation, the level of apathy from Ministers at the Department of Education, the government department responsible for safeguarding children, is astonishing.

¹⁰²

See <https://nationalcrimeagency.gov.uk/news/more-than-1-000-arrested-and-over-1-500-vulnerable-people- safeguarded-in-county-lines-crackdown>.

CCE and CSE — a lesson from history

A comparison between the national response to child sexual exploitation (CSE), with clear national and local strategies, a shared approach to risk assessment and external inspection to ensure compliance and rate performance — and the current response to CCE is instructive. It seems that the lessons of the national response to high profile CSE grooming scandals in Rotherham, Rochdale and Oxfordshire have not been learned in respect to CCE. In CSE we have a ready made template we can use as a starting point in responding to CCE if the political will exists.

With no national strategy to tackle CCE, the resulting patchwork of local system responses has left significant gaps which have been exploited by criminal gangs — leaving many vulnerable children at risk of exploitation. Worse still, we found that the experience of being taken into local authority care, a statutory intervention intended to reduce harm, often increases the risk vulnerable adolescents face of criminal exploitation in county lines drugs networks.

How can we move towards a system response to CCE which gives vulnerable young people the chance of a better life and makes the experience of being in care beneficial as vulnerable adolescents move into adulthood? Based on the insights within this report we have five recommendations.

Recommendation 1: A legal definition of Child Criminal Exploitation

The Modern Slavery Act 2015 does not contain a definition of CCE or county lines. The lack of a statutory definition of CCE has been identified by the Children's Society and HMICFRS as one of the main barriers to an effective system response to vulnerable children. For a national CCE strategy to work effectively, this legal definition must be in place as the foundation of the new system response.

A single statutory definition of child criminal exploitation in primary legislation would be transformative in building a systemwide understanding of children groomed and exploited by criminal gangs as victims rather than criminals.

Recommendation 2: A national strategy to tackle CCE

The government should launch a new national strategy to tackle CCE, jointly owned by an interdepartmental group including the Home Office, the MoJ, the DfE and the DoH.

- A new national strategy should mandate the use of a common tool for flagging CCE to be used by the police and local authorities.
- Local areas should be required to develop their own local CCE strategies reflecting the local patterns of exploitation and risk, drawing on cohort data from CCE flagged young people to understand and mitigate local risks.
- The invisibility of young women and girls in CCE cohorts and the under recording of sexual

exploitation of boys exploited in county lines and other forms of CCE should be a focus area for a new national strategy.

- The NCLCC vulnerability assessment tool should be mandated for use by all statutory partners dealing with vulnerable children, as a 'passport' which can be shared as vulnerable children move between agencies and between areas, accessible by responding officers in any police force area.

Recommendation 3: Fix the broken social care 'market' so vulnerable adolescents are not placed at distance

Considering how poor the outcomes are for children who come into care in their later teenage years, and the cost to wider public services that result from these poor outcomes, it is surprising how little effort has been made to seek viable alternatives.

Bold thinking is needed to develop an offer for vulnerable adolescents coming into care which will enable them to have a beneficial experience of care for the short time they are in the system, improving their mental and physical health and emotional wellbeing, alongside educational and employment goals.

The 'imminent' Care Review, pledged in the 2019 Conservative General Election Manifesto, must consider the role of children's social care in reducing the risk of CCE.

- Central government should invest in pilots to develop alternative models of care for vulnerable adolescents. This could include intensive one-to-one fostering relationships, with youth workers or other adults experienced with working with vulnerable teenagers, receiving training and funding to see these children through the last years of their adolescence and into adulthood.
- This should include consulting on options for alternative placement types for vulnerable adolescents such as intensive fostering models and the Danish model of 'Samvaer'.
- The review should also consider options for supporting consortia of local authorities in setting up and operating genuinely specialist, therapeutic settings offering placements for the most complex vulnerable children who have suffered exploitation.

Foster schemes for young people who are caught up in offending

There are two models for fostering children and young people who are at risk of entering custody: remand fostering and intensive fostering.

Remand fostering places children who cannot be bailed in the community with specialist foster

carers. This is a relatively short-term placement, ending when a child is sentenced.¹⁰³

Intensive fostering is a requirement attached to Youth Rehabilitation Orders, used in cases where the court believes “*that the behaviour which constituted the offence was due to a significant extent to the circumstances in which the offender was living*”. Intensive fostering placements are designed to last for six to nine months, by which point the child should be able to return to their family or move to an alternative carer.¹⁰⁴

Both fostering schemes have better outcomes than remand to custody or custodial sentences. Intensive fostering has been evaluated most rigorously, with a quasi-experimental study comparing young people’s outcomes against a comparison group (who also met the criteria for intensive fostering, but had not been included in the intervention pilot). A year after starting the intensive fostering programme, young people were significantly less likely to have been reconvicted. However, a year after *leaving* their intensive fostering placements, their reconviction rates were no different from the comparison group.

‘Samvær’: family contact and residential care¹⁰⁵

In Denmark, France and the Netherlands, a significantly higher proportion of looked after children are in residential care. However, the parents of children in these placements are more likely to retain some parental authority, and there is greater scope for meaningful involvement in their child’s life. In Danish, this involvement is referred to as “*samvær*” (“*togetherness*”). *Samvær* includes everyday shared activities like meals, watching TV together, and overnight stays in the children’s home.

Recommendation 4: End the use of unregulated care homes for looked after children

It seems likely that the Government will implement new rules for the use of unregulated care homes on which they have consulted. This includes stopping the use of such placements for those under 16, driving up the quality of support offered in independent and semi-independent provision through new national standards, introducing new measures so that local authorities and local police forces liaise before a placement in this provision is made, and giving Ofsted new legal powers to act against illegal providers.

¹⁰³ Lipscombe, Jo (2007), ‘Fostering Children and Young People on Remand: Care or Control?’, *The British Journal of Social Work*, 37(6), 973–986.

¹⁰⁴ Biehal, Nina et al (2011), ‘Intensive Fostering: An Independent Evaluation of MTFC in an English Setting’, *Children and Youth Services Review* 33(10), 2043–2049.

¹⁰⁵ Boddy, Janet et al (2013), *Beyond contact: Work with families of children placed away from home in four European countries*.

But do these proposals go far enough? If the options for accommodating vulnerable adolescents in care remain limited to the narrow range of options currently available, the goal of protecting a generation of adolescents in the care system from criminal exploitation will remain out of reach.

- The government should implement the recommendations of their review of the use of unregulated care settings, and go further, requiring that local authorities seek ministerial permission to place a looked after child in any unregulated accommodation. This should be done as a matter of urgency rather than allowing it to be rolled into the Care Review.

Recommendation 5: A contextual safeguarding approach to distant placements.

The goal of the Care Review must be to provide suitable accommodation for looked after children unless there is a compelling reason why it would be beneficial for them to be moved to another area. However, if the number of looked after children rises further and new constraints on the use of unregistered accommodation are introduced then it is likely that distant placements in children's homes will continue to play a role in the planning of local authorities as they meet their 'sufficiency duty'.

In order to add additional assurance that vulnerable adolescents are not placed in accommodation that increases their vulnerability, the existing protocols governing out of area placements should be tightened to ensure local authorities placing vulnerable adolescents in care homes 'out of area' conduct thorough and continuous risk assessments prior to placements including the police.

Recommendation 6: Reform the National Referral Mechanism for under 18s

The NRM was introduced in 2009 to meet the UK's obligations under the Council of European Convention on Action against Trafficking in Human Beings. In the UK the 'competent authority' required by the convention is currently the Home Office. But the Home Office takes an average of 452 days to reach a decision and are currently sitting on a backlog of around 12,000 cases.¹⁰⁶

The Home Office reaches decisions with little local knowledge, or clear idea how services can be marshalled to protect the child. When responsibility was moved to the Home Office from the NCA, the former Modern Slavery Commissioner Kevin Hyland told us that job adverts for staff to process were posted in national newspapers offering £10 an hour with a promise that applicants could '*learn on the job*'.

This process is further complicated for looked after children who are placed 'at distance'. These children remain the responsibility of the local area they are from as their 'corporate parent', despite the fact that they access the criminal justice system, education system and health services in the local authority area where they are placed. This means that local authorities are often blind to the true nature of the trafficking and modern day slavery happening in the area through county lines,

106

See https://www.antislaverycommissioner.co.uk/media/1461/ccs207_ccs0520602790-001_iasc_annual-report-2019-2020_e-laying.pdf.

seeing it as a problem imposed on them from outside rather than an issue they must grip.

The Home Secretary must amend the NRM process in the UK so the 'competent authority' required by international law is no longer the Home Office when the victim is under 18. Instead the competent authority role should be assumed by the local authority where the victim is resident — with a decision that takes hours or days, rather than weeks or months. This change will have resource implications for local authorities which should be met by the Home Office.

By making this change, local authority areas in which county lines exploitation is enacted will no longer be able to turn a blind eye or shift responsibility to other agencies. This can be done without the need for legislation.

Appendix A: Reference list of academic studies

Biehal, Nina et al. (2011). 'Intensive Fostering: An Independent Evaluation of MTFC in an English Setting', *Children and Youth Services Review* 33(10), 2043–2049.

Biehal, Nina. (2018). 'Balancing Prevention and Protection: Child Protection in England', in Merkel-Holguin, Lisa et al (eds), *National Systems of Child Protection: Understanding the International Variability and Context for Developing Policy and Practice*. Springer.

Boddy, Janet et al. (2013). *Beyond contact: Work with families of children placed away from home in four European countries*. Nuffield Foundation.

Firmin, Carlene. (2020). *Contextual Safeguarding and Child Protection: Rewriting the Rules*. Routledge.

Hesketh, Robert (2018), *A critical exploration of why some individuals with similar backgrounds do or do not become involved in deviant street groups and the potential implications for their future life choices*. Unpublished doctoral dissertation, University of Chester.

Lipscombe, Jo. (2007). 'Fostering Children and Young People on Remand: Care or Control?', *The British Journal of Social Work*, 37(6), 973–986.

Robinson, Grace. (2019). *Gangs, County Lines and Child Criminal Exploitation: A Case Study of Merseyside*. Unpublished doctoral dissertation, Edge Hill University.

Shuker, Lucie. (2013). *Evaluation of Barnardo's Safe Accommodation Project for Sexually Exploited and Trafficked Young People*. Institute of Applied Social Research, University of Bedfordshire.

Wroe, Lauren. (2019). *Contextual Safeguarding and 'County Lines'*. Contextual Safeguarding Network, University of Bedfordshire.

Appendix B: List of interviewees

During our fieldwork, we interviewed staff from the following organisations:

Local authorities

- St Helens Borough Council
- Knowsley Metropolitan Borough Council
- Lancashire County Council
- Wirral Borough Council

Police and OPCC

- Merseyside Police
- Lancashire Police
- North Wales OPCC
- North Wales Police
- National County Lines Coordination Centre

Care providers and third-sector agencies

- St Giles Trust
- Keys Group
- Missing People
- The NWG Exploitation Response Unit
- Research in Practice

Academics and individuals

- Professor John Drew, University of Bedfordshire
- Hannah Marshall, University of Cambridge
- Dr Jo Staines, University of Bristol
- Dr Andrew Whittaker, London South Bank University
- Neil Woods
- Kevin Hyland

Appendix C: Notes on data requested from local police forces

Data	Notes
Drug offences data, provided by North Wales Police	Data on the volume of drug offences in North Wales in April 2019 and April 2020 were requested to provide a pre-COVID/ lockdown comparison. Date of offence, location, offence group/ description, outcome and qualifiers were also recorded against each occurrence.
Missing data, provided by North Wales Police	<p>Depersonalised missing incidents in North Wales from 1 April 2018 to 31 March 2020. Age, location, date found, and whether the individual was missing from care was also recorded.</p> <p>An initial request of missing incident data in April 2019 and April 2020 was also made to provide a pre-COVID/ lockdown comparison.</p>
Missing data, provided by Merseyside Police	Depersonalised missing incidents of children (each assigned an identification number) from 1 April 2018 to 31 March 2020. Age, location reported missing from, location found, type of care address (care home, semi-independent or support living accommodation) and whether the child had been assigned a child criminal exploitation, child sexual exploitation and county lines flag was also recorded.
CCE data, provided by North Wales Police	Depersonalised data of children flagged with child criminal exploitation from September 2018 to April 2020. Age, ethnicity, residence (both intra familial and extra familial), and whether the child was from North Wales or outside the police force area was also recorded.
CE data, provided by Merseyside Police	<p>Depersonalised data of children flagged with exploitation from January 2017 to June 2020. Age, years flag effective and location were recorded as well as the following flags:</p> <ul style="list-style-type: none"> ● Child in care ● Child Protection ● Child Abduction Warning Notice ● Linked as Offender in crime(s) since 2015 ● Charged with an offence since 2015