



COUNTY LINES PATHFINDER



Norfolk
County Council



Essex County Council



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County Council



Suffolk
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Policy Review

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1. Executive summary

County Lines present a particular challenge for practitioners, given that responsibility for implementing responses to County Lines activity is shared between a wide range of bodies with different geographic focuses and organisational priorities. While responses to County Lines activity tend to be locally focused, their effectiveness can be enhanced or constrained by national policy. This policy review will identify opportunities to maximise national enablers of good local practice, expose potential barriers to effective local practice, and enable the Pathfinder to make recommendations for amendments to national policy to support local responses.

One key barrier to effective responses to County Lines activity is the differences in conceptualisation of youth violence at local and national levels. Local authorities and frontline practitioners tend to view youth violence as a public health and/or safeguarding issue, but this is undermined by national policy that grounds criminal justice intervention in notions of risk and public safety and largely ignores the wider drivers of violence. As a result, children with criminal histories can face difficulties in accessing basic services such as education and accommodation, thus exacerbating the risk of exploitation. Reframing national youth violence policy as a safeguarding issue would therefore allow for more successful coordination of policing objectives and safeguarding needs.

The lack of consistent framing of youth violence across all relevant services can sometimes lead to children involved in County Lines activity being treated as perpetrators of crime rather than victims of exploitation. This is especially true of children who do not meet law enforcement's idea of "ideal victimhood" due to their age or background. The absence of a universal legal definition of child criminal exploitation (CCE), as well as a lack of consistent safeguarding, contributes to the criminalisation of exploited children and thus limits the effectiveness of police-led responses to County Lines.

There is a need for clear national guidance regarding the applicability and usage of the Modern Slavery Act 2015 in cases of County Lines activity. Furthermore, the Act should be amended to include a standard definition of CCE to enable successful identification of, and responses to, criminally exploited children. The National Referral Mechanism presents another potentially useful measure for preventing criminalisation of CCE victims, although there is a lack of accurate data regarding its usage. Police and local authorities should therefore be obligated to gather and report local NRM referral data in order to determine the scale of CCE in their area.

The difficulty of implementing a universal response to CCE is compounded by a lack of consistency regarding collection and sharing of relevant data, with some police forces, local authorities and partnerships either not



collecting data on CCE or facing barriers, such as GDPR, when sharing data with other agencies. Given that many children (at risk of becoming) involved in County Lines activity are already known to statutory services, there is a need to formalise data-sharing practices between all relevant agencies, including when children are moved across geographical boundaries or transition from youth to adult services. There is also a need to include exploitation and trafficking markers in the National Missing Persons Register, to allow for effective identification of, and responses to, children at risk of CCE.

Effective partnership working through formalised data-sharing, joint decision-making and coordinated interventions is widely regarded as integral to the successful implementation of local and national responses to youth violence and County Lines activity. While there are some partnerships that do work well together, there is a lack of adequate government guidance as to how multi-agency approaches should work in practice. Existing multi-agency working arrangements can be undermined by the absence of key partners from meetings and the lack of a consistent, joined-up partnership approach, as well as challenges relating to GDPR legislation.

A further concern is the lack of standardised responses to indicators of CCE. Challenging behaviour in school, for instance, is a known indicator of potential exploitation and yet schools in England largely adopt punitive responses to such behaviour, up to and including exclusion, which can limit the child's access to education. This lack of access can exacerbate children's vulnerability and lead to negative life outcomes. National and local policymakers should therefore explore options for integrating schools into the wider safeguarding network through a range of risk management strategies, including formalised relationships with police and statutory agencies and providing increased support and opportunities for excluded children. Similarly, robust guidance should be put in place to ensure consistent and appropriate responses to other known indicators such as missing episodes and exposure to domestic violence.

Existing safeguarding legislation largely fails to consider the extra-familial contexts in which the majority of CCE takes place. The adoption of a contextual safeguarding approach (or assessment of risk outside the home), which emphasises changing the physical and social conditions in which exploitation occurs rather than altering individuals' behaviour, would allow for a holistic approach to CCE prevention through the creation of supportive relationships with trusted individuals and organisations and of safe spaces, whether physical or virtual.

The placement of looked after children in out-of-area and/or unregulated settings can increase their vulnerability to CCE. Children can face further risk of exploitation when they are placed in unsupervised settings and in placements that are outside of their home local authority. There needs to be a reconsideration of guidance and legislation to ensure that all placements



meet minimum quality standards and do not exacerbate children's risk of exploitation.

Given the importance of providing at-risk youth with support and opportunities for avoidance of, or desistance from, youth violence, the lack of adequate funding for local children's services undermines the effectiveness of local responses. Both national government and local authorities must therefore recognise the need for such services to have access to both long-term financial support and one-off bids for additional funds. Such funding should be prioritised for services and initiatives with a specific focus on early help and intervention, in order to provide at-risk children with meaningful alternatives to involvement in County Lines activity.

During the COVID-19 pandemic, children and vulnerable adults have continued to be subjected to exploitation and county lines activity. There is also evidence that recruiters have been exploring different methods to those traditionally used, such as recruiting more locally and using NHS badges to go unnoticed during lockdown. In response to this, a number of Government-led information-sharing and safeguarding mechanisms, such as the national COVID-19 Vulnerable Children's Hub and the Scottish Government's COVID-19 Children and Families Leadership Group, have been instituted since 2020 to identify and address risks to vulnerable children arising from the pandemic. Such mechanisms should be maintained and used as a basis from which to coordinate local and national responses to all forms of CCE, rather than strictly to those linked to COVID-19.

This review has highlighted several areas of national policy that require further amendment to enable improved local responses to County Lines activity, and therefore should be targeted in the Pathfinder's policy influencing strategy. These amendments broadly fall into three categories, which are discussed in turn below.

Policy areas that could be targeted for reframing:

- Reframe national youth violence policy as a public health and safeguarding issue;
- Reframe the national guidance on school exclusions to include child-centred approaches and limit the number of permanent exclusions;
- Take a contextual safeguarding approach to national e and safeguarding legislation; and
- Formally link domestic violence policy to youth violence responses.
- Revise guidance on the suitability of out of area placements for looked after children.

Suggested amendments to specific legislation and policy:

- Inclusion of standardised language and a standard definition of CCE in the Modern Slavery Act 2015;



- Inclusion of exploitation and trafficking markers in the National Missing Persons Register;
- Introduction of a legal obligation for police and local authorities to track and report on usages of the National Referral Mechanism; and
- Introduction of a legal obligation for police and local authorities to specifically gather and report data on local levels of CCE and school moves;
- Extension of Ofsted's remit and assurance that all children's care homes will be regulated.

Improvements to support for local practitioners:

- Issuing official guidance on appropriate usage of the Modern Slavery Act 2015 in the prosecution of County Lines perpetrators;
- Issuing official guidance on formalising data-sharing practices between relevant agencies and across geographic boundaries;
- Provision of increased, longer-term funding for local authority partnerships, particularly to support person-centred approaches;
- Provision of an accessible, national platform where local practitioners identify existing evidence on what works to inform their practice.



2. Approach to the policy review

This policy review examines key policy areas in England and Wales relating to County Lines activity, such as education, criminal justice and children's services, and identifies opportunities to maximise enablers of good practice at the national level and to expose potential barriers to effective local practice. The purpose of this review is to enable the County Lines Pathfinder to identify national policies that may require amendment at central government level in order to enable effective local responses to County Lines activity.

The relevant deliverables for this review were grouped into four categories to avoid "cherry-picking" and to allow for consideration of each deliverable within the wider national picture of County Lines activity. These categories were:

- Partnership approaches;
- Interventions;
- Staff training; and
- Promising practice in delivery.

The Pathfinder Governance Board put forward a longlist of policies and reports for inclusion in this review, which were whittled down through consultation with Traverse to a shortlist of thirty-three documents. These documents fell into ten distinct categories:

- Case reviews.
- Enforcement and disruption of perpetrators;
- Housing and accommodation;
- Lack of coordination across government;
- Modern slavery;
- Pathways out of County Lines activity;
- Safeguarding and child protection;
- School exclusion, access to education and alternative provision;
- Serious youth violence; and
- Transition between youth and adult sectors.

The shortlisted sources were subjected to a rapid review process and a 2-page summary was produced for each document, highlighting:

- Its applicability to the four deliverable categories;
- Barriers to effective local practice;
- Enablers of effective local practice; and



- Recommendations for effective local practice, and/or the potential for the outcomes from the deliverables to influence policy.

Once all sources had been reviewed these summary documents were analysed and common themes across, and discrepancies between, information relating to the four deliverable categories were highlighted. This allowed for the identification of high-level barriers to, and enablers of, effective local practice, as well as recommendations for amendments to national policy that would enable more effective local responses to County Lines activity.

We reviewed documents authored by:

- APPG on Runaway and Missing Adults and Children
- Beyond Youth Custody
- Centre for Mental Health
- Centrepoin
- Children's Rights Alliance for England & Just Kids Law
- Contextual Safeguarding Network
- Crest Advisory
- Criminal Justice Joint Inspection
- Dame Carol Black
- Department for Education
- Dr James Windle, Dr Leah Moyle and Professor Ross Coomber
- Early Intervention Foundation
- Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services
- Jessica Jaensch & Professor Nigel South
- JH Consulting
- Missing People
- National Crime Agency
- Newham Local Safeguarding Children Board
- Nigel Stone
- Ofsted
- Oxfordshire Safeguarding Children Board
- The Child Safeguarding Practice Review Panel
- The Children's Society
- UK Home Office
- University of Edinburgh
- University of Sussex
- Victims Commissioner



3. Barriers to and enablers of local practice

3.1. *Differences in national and local approaches*

A key barrier for effectively tackling County Lines activity is that there are contradictory approaches to youth violence at national and local level. For example, the London Assembly's Violence Reduction Unit conceptualises youth violence as both a law enforcement and a public health issue; however, in practice, this emphasis on public health is undermined by national policy that grounds criminal justice intervention in notions of risk and public safety and fails to address the political and socioeconomic drivers of violence. This contributes to a popular and political understanding of gang activity as the "life choice" of undesirable individuals rather than a safeguarding concern.

The continued criminalisation of youth drug use also undermines a welfare-based approach to County Lines and other forms of gang activity. The Contextual Safeguarding Network suggests that there should be exploration into whether local policing objectives are consistent with safeguarding needs and whether local safeguarding policy is underpinned by a clear legal or ethical framework. However, the applicability of these suggestions may be undermined by risk-focused national policy, and so a shift to a public health focus may enable wider use of these approaches.

3.2. *Victimisation not criminalisation*

There are various, and contradictory, ways of communicating and dealing with children exploited through County Lines whereby they are not always seen or treated as victims. This may be because (a) child criminal exploitation is not defined by law, which means that responses to it can vary dramatically and (b) there is a lack of consistent national safeguarding strategies, which means safeguarding responses are largely reactive. In fact, two-thirds of local authorities do not have specific strategies for preventing or responding to CCE.

Additionally, the "gang" label often used not only limits the description of perpetrators of County Lines activity – as the behaviour and characteristics of groups engaged in County Lines activity represent a hybrid of rational, strategic Organised Crime Groups (OCGs) and traditional street gangs – but popular understanding of "gangs" are that they are one-dimensional and radicalised. This can contribute to the inappropriate criminalisation of children, especially young black men, by portraying them as rational actors rather than as victims of exploitation.

Criminalisation tends to take precedence over safeguarding due to many children who are known to statutory agencies already being involved in criminal activity. This contributes to a culture in which safeguarding provisions are extended only to children who are readily identifiable as victims. The same is true of cases in which the young person in



question is older and is unwilling or unable to identify their exploiter. This notion of ideal victimhood can lead to the “adultification” and criminalisation of exploited children whose circumstances should make them eligible for safeguarding.

Some recommendations for change include additional training for police and other frontline staff regarding trauma-informed approaches and the more contextual form of safeguarding that is required to support this. Currently, not all frontline staff are trained to identify vulnerable children in the context of CCE and so practitioners must be encouraged to ask, “is this a vulnerable child?” and “has this child been criminally exploited?” when dealing with incidents.

Conscious shifts in the language used to describe the actors within an exploitative relationship can contribute to a cultural shift towards a more child-centred, trauma-informed approach. Consistently referring to “victims” of CCE as such, and emphasising their status as “children”, can reduce the risk of adultification and inappropriate criminalisation. Similarly, practitioners should be encouraged to use standardised language across all forms of child exploitation, such as referring to perpetrators as “abusers” rather than the less emotive “exploiter” and avoid inappropriately romanticising the relationship between victim and abuser through the use of terms such as “boyfriend” and “girlfriend”, even when both parties are of a similar age.

There is legislation that can be utilised to identify children and children as victims of exploitation as opposed to perpetrators of crime. Section 45 of the Modern Slavery Act (2015), if used by the police/CPS, can enable children involved in County Lines to be treated as victims rather than perpetrators. To support consistent use of Section 45 and the framing of children as victims rather than criminals, a standard definition of CCE should be included in the Modern Slavery Act. The government should also ensure that all departments and statutory agencies involved in responding to CCE are provided with clear guidance regarding their role and responsibilities and should develop a shared strategy for tackling CCE and update statutory guidance accordingly.

3.3. Access to education

There is significant evidence that children who are denied access to education are more likely to experience negative life outcomes, such as economic instability or involvement in criminal activity. Exclusion can act as both a driver and consequence of children’s vulnerability and exploitation; keeping at-risk children in full-time education should therefore be a priority.

It is therefore concerning that permanent exclusion is widely used in England, and that there is a tendency for education providers to employ both formal and informal exclusion mechanisms in response to “challenging” behaviour, rather than pursuing appropriate referrals and interventions from statutory services. This is in stark contrast to Scotland, where solutions to such



behaviour emphasise restorative practices and solution-orientated responses, with exclusion seen as a last resort. Informal exclusion practices such as “off-rolling” are particularly problematic, as children excluded in this way are denied the right to appeal and are not able to access alternative sources of formal education. As such, these children fall through the cracks in the system and are highly vulnerable to criminal exploitation.

The use of exclusion in response to challenging behaviour in school ignores the importance of such behaviour as an indicator of potential criminal exploitation. Challenging behaviour can be an indicator that a child may have had exposure to Adverse Childhood Experiences (ACEs) and/or an indicator of various forms of vulnerability, such as abuse or CSE. Rather than seeking to remove the young person in question from the school environment, education providers' first responsibility should be to safeguard the child and work with relevant statutory services to assess the type, and level, of risk and provide appropriate support.

It is also important to consider other factors that may contribute to children's exclusion from education. Challenging behaviour may be driven by external circumstances, whether local, such as high levels of poverty or substance abuse in the community, or individual, such as childhood trauma and ACEs. Schools must be aware of such factors, as they should inform the design and delivery of appropriate interventions.

Furthermore, research suggests that certain demographics are at increased risk of exclusion. Children who are economically disadvantaged, are in care, or have Special Educational Needs (SEN) are significantly more likely to experience exclusion. Similarly, Black Caribbean and Mixed White/Black Caribbean children have been shown to be most at risk of exclusion from education, whether through formal or informal means. There is therefore a clear need for legislators and education providers to consider how exclusion is used in England and how this may exacerbate risks to individual children, as well as wider social inequalities.

3.4. Information-sharing infrastructure

In order to successfully address County Lines activity and the exploitation of children, there must be suitable systems and processes in place to collect, manage and disseminate the necessary information required to map activity and support the children involved. As it stands, there is a distinct lack of infrastructure in place to support effective tracking of child criminal exploitation. This mainly relates to a lack of consistency regarding data collection and information and data sharing. Research suggests that most police forces do not have accurate figures regarding local levels of CCE and, according to a 2019 study by The Children's Society, while one in four local authorities claim to collect CCE data only one in five are able to share that data with other agencies. Furthermore, the absence of a central automated national police system places severe restrictions on the flow of information between local and national law enforcement agencies.



The lack of robust information-sharing mechanisms within and between the various agencies engaged in tackling CCE can exacerbate the risks experienced by vulnerable children. Even if a young person is successfully identified as vulnerable, the failure to communicate this to the relevant agencies can lead to appropriate intervention points being missed.

Similarly, in cases where children are moved out of their home area due to safeguarding concerns, such moves and the reasons for them are not consistently communicated to the relevant services in the destination area, thereby limiting the young person's access to appropriate support. Inadequate information-sharing practices can also present a barrier to children's successful transition between youth and adult statutory services, leading to interruptions – and even drop off – to the delivery of sentence plans and interventions when they turn 18.

The documents reviewed highlighted a range of enablers that could improve information sharing such as:

- Youth Offending Services (YOS) and other practitioners notifying the police if they become aware of a deal line - police can then use the Drug Dealing Telecommunications Restriction Order to close down deal phone lines. Police can subsequently inform YOS of how this shared information has been used.
- In lieu of specific CCE data, information on drug-related arrests of children aged 10-17 can act as a suitable proxy. Arrests for intent to supply are more common than possession charges.¹
- Sharing results of service delivery to help maximise learning and to provide an evidence base to inform ongoing service development locally and nationally.
- If the National Missing Persons Register incorporated exploitation and trafficking markers, this would help identify potential CCE concerns which police and local authorities should map in collaboration with each other.
- Currently Children in Need and Child Protection safeguarding cases are transferred between local authorities if a child moves out of area. It is the responsibility of the home local authority to transfer the case to the new local authority Children's Social Care Service. If a Child in Care is being moved, they remain the responsibility of the home local authority. As Children in Care are increasingly being moved out of area, this presents an essential opportunity for effective

¹ The Association of Youth Offending Team Managers (AYM) has also raised concerns about the overuse of Release Under Investigation (RUI) in youth violence and drug-related cases. The AYM would prefer to see wider use of bail with specific conditions, which may present a barrier to further exploitation and allow an opportunity for intervention by Children's Services. However, the use of RUIs was not covered in the documents analysed for this review, and so further investigation of this topic may be required.



information-sharing with the local authority in which the young person is residing.

The Home Affairs Committee has also recommended that a common dataset collected consistently across the country should be established by the government. To date, the government have not responded to this recommendation and use existing data to monitor crime trends. This pathfinder is supportive of a common dataset and has taken steps to create a recommended minimum dataset.

3.5. Multi-agency Approaches

In order to combat County Lines effectively, there must be a coordinated response between police, children's services, youth offending services, schools, health services, charities and all other local, relevant parties. This includes information sharing, joint decision-making and coordinated intervention. However, there is a distinct paucity of both guidance and funding at government level that might facilitate effective inter-agency partnership working at the local level to prevent and safeguard children from becoming involved in County Lines activity.

While multi-agency interventions have been shown to be most effective, these are most successful when built on pre-existing relationships and common objectives. Furthermore, responsibilities and information-sharing processes should be clearly outlined, organisational and geographical boundaries should be closely aligned, and strategic oversight should be provided by senior representatives of all agencies. Localised working is common to all these models, which may prove a challenge given the multi-location County Lines business model.

In its Serious Violence Strategy 2018, the Home Office outlined plans to facilitate improved data collection on youth violence by encouraging Police and Crime Commissioners and Community Safety Partnerships to engage with relevant local agencies and practitioners and to share information and intelligence with other partnerships across the country as well as national government. However, there is little evidence to indicate that this has occurred to date. The lack of consistent and comprehensive information sharing across localities is an enduring barrier to effectively supporting children exploited and trafficked across the country.

A further concern is that poor local practice may limit the efficacy of existing partnership working arrangements. Such arrangements tend to revolve around the use of multi-agency meetings as established forums for discussing and coordinating joint approaches to safeguarding. However, in practice, key actors such as housing providers may not be engaged in such meetings and as such may be excluded from the decision-making process. Furthermore, decisions taken in multi-agency meetings are not always clearly communicated to practitioners tasked with actioning the chosen approach, thereby limiting the effectiveness of any multi-agency intervention.



Practitioners will need to consider how best to coordinate efforts between agencies in areas of recruitment and those in areas of distribution and ensure that their approach differentiates between these areas and accounts for differences in residents' needs and gang / OCG dynamics. Effective multi-agency working is also needed to facilitate a successful transition between youth and adult services, and so practitioners must ensure that the roles and responsibilities of the relevant agencies are clearly defined to enable a positive experience of transition for the young person in question.

Some examples and recommendations of how to implement an effective multi-agency approach include the following:

- The Children's Society recommends that partnership working should be formalised through local safeguarding partnerships, which should assess local levels of CCE and produce locally focused intervention strategies outlining the support available to at-risk children.
- The Early Intervention Foundation suggests that local authorities should explore ways to formally link primary schools into the early help system through partnership working and should ensure that in-school support for at-risk children is coordinated with wider support for the whole family through external agencies/providers.
- The Manchester Multi-Agency Gang Strategy 2001 was based on an "ecological" interpretation of gang violence, in which such activity was viewed as the result of local history, social networks and socioeconomic trends. This approach included the secondment of full-time staff from the police and youth, education and probation services, as well as the creation of a dedicated police gangs unit that coordinated with social workers to provide a visible presence in gang-affected areas and engage with at-risk children. The use of this model saw a significant drop in violent crime and gang activities in Greater Manchester.²

3.6. Awareness-raising sessions and training

There is widespread agreement on the need for additional training for teachers around the indicators and implications of youth violence, as well as clearer referral pathways for at-risk children. There is also a need for awareness-raising in schools and wider communities. Opportunities for change include:

- Primary schools should be better integrated into the wider child protection system in order to properly fulfil their obligations to effectively intervene as early as possible when children display indicators of involvement in youth violence.

² More information on the Manchester Multi-Agency Gang Strategy can be found in Chapter 7 of this report from Beyond Youth Custody: [Gang-involved-young-people-custody-and-beyond-a-research-report.pdf \(beyondyouthcustody.net\)](https://www.beyondyouthcustody.net/beyond-a-research-report.pdf)



- Primary school staff (and other local practitioners) need to be provided with clear and accessible messaging regarding best practice in early intervention.
- Evidence suggests that effective PSHE programmes can reduce children's later involvement in crime and youth violence (as well as psychological issues, e.g. aggression, mental health issues and drug abuse). There is therefore a need for compulsory PSHE in all primary schools.
- Awareness-raising sessions in schools and PRUs may prevent children becoming involved in County Lines activity, though their efficacy is unproven. Schools can also use online learning platforms, such as Sway, to raise awareness. Currently, many children do not self-identify as victims and as such may not engage with desistance initiative and services. Raising awareness about the signs of CCE and how to identify groomers might help such children to reconsider their victim status if they are, or later become, involved in County Lines activity. Such sessions can be particularly effective if they are delivered by individuals with comparable lived experience to the young people in question, who are seen as credible by their target audience.

3.7. Contextual Safeguarding

Current safeguarding legislation does not consider extra-familial context which is problematic for County Lines and CCE as this usually occurs outside of the home. The contextual safeguarding approach focuses on changing the conditions in which exploitation occurs, rather than altering the behaviour of individuals, as well as ensuring that the child's extra-familial context is considered and understood when supporting them.

Practitioners can engage children in "safety mapping" exercises to establish where and when they feel particularly (un)safe and should utilise resident and business surveys to identify trusted individuals and/or organisations that can act as "community guardians" and provide support to at-risk youth. Contextual safeguarding also requires flexibility and monitoring of, often fast-changing, risks in order to 'stay with the child', and this must occur simultaneously with multi-agency meetings to be successful. If this is done successfully, professionals may have a better understanding of patterns of engagement and disengagement and therefore, may be less likely to close cases prematurely because the child did not engage.

A recommendation for change with regards to this barrier would be the involvement and training of local communities and services that don't typically support children to improve identification of those exploited and improve disruption of County Lines activity. For example, staff and management of parks, fast food restaurants, bus/train stations, taxi services and late-night businesses.



3.8. *Involving children and families*

Much of the literature about effective interventions with children experiencing, or at risk of, exploitation references the need for practitioners to involve those children and their families in decision making around the design and delivery of interventions. As with awareness-raising sessions (above), interventions may more effective when they are designed and delivered by individuals who are seen as credible by the young person in question, rather than simply by professionals.

The strength of relationships between children and practitioners is known to influence the efficacy of interventions, and as such significant time and effort is invested in building trust to facilitate positive interactions. However, there is also a need to build a positive relationship between practitioners and the families of the children in question and to treat them as partners in the intervention process. Failure to do so can lead to family members believing that they are being criticised or blamed and thus disengaging from the intervention process. Evidence suggests that the active engagement of parents and other family members in the design and delivery of risk management plans leads to more successful and impactful interventions.

Given the strength of the relationship between individual practitioners and the children they work with, the transition from one service to another can present a barrier to children's continued engagement. Children who transition from youth services to adult services may still be highly vulnerable, but current practice does not provide them with the information and support required to navigate the transition. Practitioners should involve children in the process and provide them with insight into the support available from adult services, to ensure that they continue to access the support they need even after they turn eighteen.

3.9. *Regulation of accommodation placements*

A key finding of this Policy Review is the inadequacy of current approaches to regulating placements for looked after children. This problem is underpinned and exacerbated by a lack of placement sufficiency, meaning that local authorities may not have access to the types of placements that are most appropriate for the children they look after. Increased numbers of looked after children, reduced local authority funding and a lack of suitable foster care places has led to a dramatic increase in semi-independent provision since 2010, with 75% of looked after children now living in settings run by private providers. Semi-independent accommodation is not nationally regulated, and as such their quality varies dramatically.

Efforts to tackle this problem have been largely ineffective. While new Government legislation prohibits the use of such placements for children under 16 (effective from September 2021), this does not extend to the estimated 8,400 16-and-17-year-olds living in unregulated semi-independent provision. Furthermore, proposals to provide Ofsted with new powers to



regulate such providers are undermined by the fact that they are not legally classed as “care providers” and as such do not currently fall within Ofsted’s remit. There is a clear need to review existing legislation regarding semi-independent provision to ensure that these settings meet the legal minimum standards for placements and that looked after children are appropriately safeguarded.

3.10. Critical Intervention Points

A crucial enabler to effective practice when dealing with County Lines activity is knowing and acting on the critical moments when intervention is likely to be most effective or is most necessary. The following have been identified as critical points for intervention:

- Missing episodes;
- Displays of challenging behaviour in school;
- Threat of exclusion;
- Transition from school to further education or full-time employment;
- Moving into/living in semi-independent accommodation;
- Apprehension by the police and threat of imprisonment;
- Receipt of a Criminal Behaviour Order (CBO);
- Death or serious injury of a friend or relative; and
- Hospital admission or injury to self.

Frontline practitioners and statutory services have made a range of recommendations for actions to be taken at critical intervention points. In cases of missing episodes, family members should be able to contact a phone service, such as SafeCall, in order to receive specialist support.

The Home Office has provided ongoing funding for SafeCall, which is a national missing persons phone line specifically for County Lines activity, acting as a key part of the information-sharing infrastructure and improving mapping of County Lines. Relevant local agencies should also agree on a “coordinated minimum response” to missing episodes, particularly for those children who have been moved out of area due to risks of CCE. In-depth return interviews should be central to this minimum response and should be used to ascertain the likelihood of the child’s involvement in criminal activity. The information obtained from these interviews can also be used to map local levels of CCE, including County Lines activity.

Given the importance of challenging behaviour in school as an indicator of potential criminal exploitation, schools should provide improved pastoral care and regular PSHE classes with an emphasis on conflict resolution, emotional literacy and self-esteem. Teachers and practitioners should participate in awareness training regarding the indicators of, and effective responses to, youth violence and CCE.



It is estimated that on in five children in the UK witness or are exposed to domestic abuse during their childhood.³ Children who are victims of and experience domestic violence are more likely to display challenging behaviour at school, sometimes resulting in exclusion. Timely information sharing between police, social services and schools when children have been exposed to domestic violence can help in the identification and support of at-risk children earlier.

Apprehension by police and implementation of injunctions or crime prevention orders can be an opportunity for intervention. Police can use a suite of injunctions, such as community protection notices, gang injunctions and serious crime prevention orders. Criminal behaviour orders (CBOs) are another example of orders used to prevent association with gang members, restrict travel to certain areas and prohibit the possession of more than one mobile phone. This may provide children with an opportunity to desist from County Lines activity, and thus may lead to increased engagement with YOS. However, these should be used as a last resort, be proportionate to the situation and should not be utilised without a proper consultation and local agreements taking place. Furthermore, if the young person in question suspects that YOS instigated issuance of the CBO then this could lead to reduced engagement, which itself presents another critical point for intervention.

3.11. Funding and Resources

Many practitioners and agencies stress a lack of the adequate resources or the appropriate funding necessary to meet demand. If children are to be disincentivised from engaging in gang activity, the government must address the shortfall in children's social care funding and invest in local children's and youth justice services, particularly those providing early help and intervention services. As per the Home Office's Serious Violence Strategy 2018, funding is available for targeted investment in disadvantaged areas through the Early Intervention Youth Fund, the Youth Endowment Fund and the Trusted Relationships Fund, which provide financial support for organisations providing support to at-risk children in their local area. To date, much of the available funding is provided on a short-term basis and is not often available to local authorities and statutory agencies, which limits the sustainability of interventions supporting children.

The allocation of adequate resources should go beyond simply providing financial support to include practical resources for supporting interventions. An example of this is underutilisation of Independent Child Trafficking Advocates, whose involvement is currently restricted to cases where exploited children do not have effective parental support and who are

³ NSPCC quoted in MoJ (2019) 'Children affected by domestic abuse to benefit from £8 million fund'. Available online: <https://www.gov.uk/government/news/children-affected-by-domestic-abuse-to-benefit-from-8-million-fund>



allocated on a short-term basis. The provision of Independent Child Trafficking Advocates on a long-term basis in all cases of County Lines exploitation would increase the effectiveness of interventions and help to prevent further victimisation.

Furthermore, policy makers should explore options for providing viable monetary alternatives to engagement in criminal activity alongside support services and interventions. Providing at-risk children with increased access to employment, training and apprenticeships, for instance, might help to facilitate desistance if delivered alongside a robust support and intervention offer.

3.12. Characteristics of frontline practitioners

Practitioners' engagement with at-risk children is more likely to be effective if they are able to empathise with their experiences and are comfortable operating within the cultural and social context of the child in question. All frontline practitioners should therefore be able to demonstrate the cultural competence required to cultivate relationships with young people from a variety of backgrounds, drawing on specialist knowledge, trauma-informed approaches and contextual safeguarding as appropriate.

There is also some evidence to suggest that employing practitioners with lived experiences comparable to those of the children they work with may contribute to the success of local interventions. The Kent County Lines Pilot Project made special provision for the employment of practitioners with experience of County Lines and other forms of exploitation, and this was deemed to contribute to the success of one-to-one casework as evidenced by a reduction in missing episodes from 123 before intervention to 49 in the following four months. There may therefore be scope for local agencies to explore the efficacy of targeted recruitment of practitioners with relevant lived experience of exploitation.

3.13. Impact of COVID-19

Research suggests that the activities of County Lines perpetrators, and the risks to exploited individuals, have not been diminished by the COVID-19 pandemic. Many children and vulnerable adults have continued to be subjected to criminal exploitation throughout the pandemic, as restrictions introduced to curb the spread of COVID-19 have led to the closure or suspension of services and initiatives that may act as barriers to their exploitation by criminal groups. Furthermore, the rolling back of restrictions over the coming months is expected to see increased demand for criminal services and a concerted effort from perpetrators to recruit new victims and to re-engage with those who were inaccessible during the pandemic.

The COVID-19 pandemic also left many children across the UK without access to education for an extended period. Not only is this likely lead to increased vulnerability to exploitation in the short term due to their absence from controlled school environments, but the disruption of formal



examinations for some children may present a barrier to their engagement in further education, and as such they may become more vulnerable to criminal exploitation in the long term. A further concern is that the economic impacts of the pandemic will have been most keenly felt by those families and communities who are economically disadvantaged, which in turn may make them more vulnerable to exploitation by criminal groups.

It should be noted, however, that the COVID-19 pandemic has led to the creation of new Government-led information sharing and safeguarding mechanisms, including the national COVID-19 Vulnerable Children's Hub and the Scottish Government's COVID-19 Children and Families Leadership Group. Such initiatives seek to coordinate local and national interventions with vulnerable children, and while their efficacy is yet to be seen, it is notable that political leaders have recognised the need to enhance responses to criminal exploitation in the context of the pandemic. It is hoped that these mechanisms will continue to operate in the aftermath of COVID-19, and that they are expanded to cover all forms of criminal exploitation rather than those explicitly linked to the pandemic.



4. Opportunities to influence national policy

This review has highlighted several areas of national policy that require amendment to enable improved local responses to County Lines activity, and therefore should be targeted in the Pathfinder's policy influencing strategy. These amendments broadly fall into three categories: reframing of policy areas, amendments to specific legislation, and improvements to government guidance and support.

4.1. Policy areas that could be targeted for reframing

4.1.1. Overview of recommendations

Policy areas to be targeted for reframing	Recommendations	Who is responsible?
	1. Reframe national youth violence policy as a public health and safeguarding issue.	Department for Education and Public Health England
	2. Reframe the national guidance on school exclusions to include child-centred approaches and limit the number of permanent exclusions.	Department for Education
	3. Take a contextual safeguarding approach to national child welfare and safeguarding legislation.	Department for Education
	4. Formally link domestic violence policy to County Lines and youth violence responses.	Ministry of Justice
	5. Revise guidance on the suitability of out of area placements for looked after children.	Department for Education and Home Office

Relevant sources (see Appendix A):

- Centrepoin, 2019.
- Children's Rights Alliance for England & Just Kids Law, 2020.
- Contextual Safeguarding Network, 2019.
- Department for Education, 2019.
- Home Office, 2018a.
- McCluskey, G. et al., 2019.
- The Children's Society, 2019.
- University of Sussex, 2017.
- Victims Commissioner, 2020.



4.1.2. Reframe national youth violence policy as a public health and safeguarding issue

One key barrier to effective responses is the differences in conceptualisation of youth violence at local and national level. While local authorities and frontline practitioners tend to view youth violence as a public health and/or safeguarding issue, in practice this is undermined by national policy that grounds criminal justice intervention in notions of risk and public safety and shows little regard for the wider drivers of violence.

Risk-focused national policy undermines effective local practice. It poses barriers to ensuring local policing objectives are consistent with safeguarding needs and underpinning local safeguarding policy with a clear legal or ethical framework. A concerted effort to reframe national youth violence policy as a public health and safeguarding issue would allow for more successful coordination of policing objectives, statutory responses and safeguarding needs.

4.1.3. Reframe the national guidance on school exclusions to include child-centred approaches and limit the number of permanent exclusions.

There is a clear correlation between children who are excluded from school and vulnerability to CCE. The numbers of permanent exclusions in Scotland have been significantly declining in recent years, in some part due to the Scottish national guidance on exclusions, which focuses on restorative practices, effective teaching and learning, and other preventative measures that put emphasis on understanding the complexity of the young person's life and needs. In stark contrast, English national guidance currently lays out multiple punitive measures, as well as advice on powers to search without consent and use 'reasonable force'. The English national guidance should be brought more in line with the Scottish guidance, to focus more on prevention rather than punishment and to change the narrative around permanent exclusion. This issue is further complicated by the proliferation of academies in England, which are not subject to Government guidance on exclusion. Political decisions makers should therefore explore options for compelling academies to limit permanent exclusion wherever possible, and to admit children who have been excluded from other schools in order to provide more options for alternative sources of education.

4.1.4. Take a contextual safeguarding approach to national child welfare and safeguarding legislation.

Current safeguarding legislation focuses on the home lives of at-risk children. When working with children and children exploited by County Lines activity, this limits evidence gathering and the support available as County Lines and CCE usually occurs outside of the home and/or online. While the government has acknowledged the importance of context in tackling youth violence and exploitation, in practice individuals are targeted within a given



context rather than the context being addressed.

Contextual safeguarding comprises four areas:

1. "Targets" – identifying, assessing and preventing social conditions of abuse;
2. "Legislation" – incorporating extra-familial contexts into child protection frameworks;
3. "Partnerships" – partnering with sectors and individuals with responsibility of the nature of extra-familial contexts; and
4. "Outcomes" – monitoring success regarding contextual (and individual) change, i.e. community relations, peer group norms, spatial safety, etc.

Utilising this approach could enable statutory services and their partners to better identify the factors that precipitate and the contexts in which harm and exploitation can occur. This could result in more proactive, joined up rather than reactive, siloed responses to County Lines and CCE, with more at-risk children receiving support before and after involvement in County Lines. This approach can therefore encourage effective partnership working and the implementation of a child-centred, public health approach as outlined above.

4.1.5. *Formally link domestic violence policy to County Lines and youth violence responses*

Children with previous experience of domestic violence are thought to be particularly vulnerable to County Lines exploitation. Although this link is not deterministic, evidence suggests that children referred to projects providing support to victims of County Lines exploitation are likely to be known to statutory services prior to their referral, suggesting that there is a need for improved information sharing practices in this area. Better information sharing in this case could also facilitate preventative early intervention and support for children who are vulnerable to child criminal exploitation. To link County Lines policies with domestic violence policies could prove extremely fruitful in preventing children from becoming involved in County Lines from early on.

Children who are victims of and experience domestic violence are more likely to display challenging behaviour at school, sometimes resulting in exclusion. Where exclusion occurs, children may experience a double rejection by both their families and school. Another benefit of linking domestic violence policy to County Lines and youth violence responses is that connections between these factors can be identified earlier in individual cases.

4.1.6. *Revise guidance on the suitability of out of area placements for looked after children*



According to the Children Act 1989, looked after children must be placed in accommodation provided by local authorities “within the local authority’s area” unless this is “not reasonably practicable.” Guidance published by the Department for Education states that sometimes an out of area placement may be most appropriate for a child. However, the prevalence of out of area placements could be said to be contributing to the wider issues around children, child criminal exploitation and county lines.

The Department for Education (DfE) and Home Office should develop a cross-departmental strategy on tackling CCE and County Lines with specific focus on out of area looked after children. Furthermore, the DfE should develop an Emergency Action Plan to address national and local placement sufficiency, with a view to reducing the number of out of area placements and providing strict guidance on the use of semi-independent unregulated settings. Where decisions are made to house children out of area, they must be supported by evidence to demonstrate that the decision will keep the child safe and meet their identified needs.

4.2. Amendments to specific legislation and policy

4.2.1. Overview of recommendations

Amendments to specific legislation and policy	Recommendations	Who is responsible?
	1. Include a standard definition of CCE in the Modern Slavery Act 2015.	Home Office
	2. Include exploitation and trafficking markers in the National Missing Persons Register.	Home Office
	3. Introduce a national obligation for police, local authorities and the CPS to track and report on usages of the National Referral Mechanism.	Home Office
	4. Introduce a legal obligation for police, health services and local authorities to specifically gather, report and share data on CCE and school moves.	Home Office
	5. Extend Ofsted’s remit to ensure all settings that look after children are regulated.	Department for Education

Relevant sources (see Appendix A):

- All Party Parliamentary Group for Runaway and Missing Children and Adults, 2017.
- All Party Parliamentary Group for Runaway and Missing Children and Adults, 2019.



- Crest Advisory, 2020.
- Dame Carol Black, 2020.
- JH Consulting, 2018.
- Missing People, 2019.
- Ofsted, 2018.
- Stone, N. (2018).
- The Children's Society, 2019.
- Victims Commissioner, 2020.

4.2.2. *Include a standard definition of CCE in the Modern Slavery Act 2015.*

The lack of a single universal definition of CCE is a significant barrier to identification of children at risk of criminal exploitation, and failure to identify victims of CCE as such can lead to their inappropriate criminalisation. While Section 45 of the Modern Slavery Act 2015 should in theory preclude the criminalisation of children involved in County Lines activity, in practice it is applied inconsistently due to an inability to effectively identify CCE victims. The Act should therefore be amended to include a standard definition of CCE to support the consistent use of Section 45 in County Lines cases and the reframing of criminally exploited children as victims rather than perpetrators.

4.2.3. *Include exploitation and trafficking markers in the National Missing Persons Register.*

Missing episodes are widely acknowledged as an indicator of CCE. This is particularly true in the case of County Lines activity due to the multi-location model, and so those agencies dealing with missing persons cases should be made aware of the potential for CCE and provided with the means to accurately identify CCE victims and provide appropriate support. As such, exploitation and trafficking markers should be incorporated into the National Missing Persons Register to allow for the identification of potential CCE concerns and to facilitate collaborative CCE mapping between police and local authorities.

4.2.4. *Introduce a national obligation for police, local authorities and the CPS to track and report on usages of the National Referral Mechanism.*

While the National Referral Mechanism (NRM) provides an avenue for preventing the inappropriate criminalisation of criminally exploited children, there is no obligation for police, local authorities or the CPS to track or report its usage. Consequently, the NRM is not being used appropriately or consistently by agencies. This lack of accurate data prevents local and national agencies from using NRM data to determine the scale of CCE in a



given area. Police, local authorities and the CPS should therefore be legally obligated to consistently gather and report data on the number of NRM referrals in their area, as this would provide significant insight into local levels of CCE. Furthermore, the Single Competent Authority should be required to regularly publish national data on the number and success rate of NRM submissions, and to share its reasons for rejecting or upholding submissions with the relevant local agencies.

4.2.5. Introduce a legal obligation for police, health services and local authorities to specifically gather, report and share data on CCE and school moves.

The lack of consistency regarding collection and reporting of CCE data across police forces and local authorities presents a significant barrier to the implementation of standardised responses to CCE. Some police forces and local authorities do not collect CCE-specific data, and those that do may be unable to share this data with external agencies due to data compliance regulations. National data protection legislation must therefore enable agencies to disseminate information essential to the disruption of County Lines activity. Furthermore, with the rise in 'off-rolling' and large numbers of formal permanent exclusions, local authorities should be required to track school moves in order to ensure children do not drop out of education entirely. The government should therefore introduce a legal obligation for police and local authorities to collect data on local CCE levels, and school moves, and should remove barriers to information sharing between relevant national and local agencies.

4.2.6. Extend Ofsted's remit to ensure all settings that look after children are regulated.

The lack of appropriate accommodation for looked after children is a significant barrier to appropriately safeguarding children at risk of CCE. Following consultation, the Government implemented new legislation in September 2021 that prohibits children under 16 from being accommodated in unregulated independent or semi-independent placements. To ensure that all children receive the care and support they need, the Government should extend Ofsted's remit in this sector and should regulate all accommodation settings that host children, rather than only those who register as a care provider.

4.3. Improvements to support for local practitioners

4.3.1. Overview of recommendations



Improvements to support for practitioners	Recommendations	Who is responsible?
	1. Issue official guidance on appropriate usage of the Modern Slavery Act 2015 in the prosecution of County Lines perpetrators.	Home Office
	2. Issue official guidance on formalising data-sharing practices between relevant agencies and across geographic boundaries.	National County Lines Coordination Centre
	3. Issue official guidance regarding the implementation of standardised responses to indicators of potential County Lines involvement.	Across Government departments
	4. Provide an accessible, national platform for local practitioners to use existing evidence on what works to inform their practice.	National County Lines Coordination Centre and/or Department for Education
	5. Provide increased, longer-term funding, particularly to support person-centred approaches.	Department for Education

Relevant sources (see Appendix A):

- Dame Carol Black, 2020.
- Early Intervention Foundation, 2018.
- Home Office, 2018b.
- Home Office, 2019.
- JH Consulting, 2018.
- Stone, N., 2018.
- The Children's Society, 2019.
- University of Sussex, 2017.
- Victims Commissioner, 2020.

4.3.2. Issue official guidance on appropriate usage of the Modern Slavery Act 2015 in the prosecution of County Lines perpetrators.

As well as the lack of a single universal definition of CCE, a key challenge to effective local practice is the lack of consistency in the use of Section 45 of the Modern Slavery Act. It is often difficult to apply anti-slavery and trafficking legislation to identify victims of CCE and County Lines because children are unlikely to identify themselves as such. Continuation of the Home Office's guidance on "spotting the signs" of trafficking and exploitation of children can also help practitioners identify victims.



To support consistent use of Section 45 and the framing of children as victims rather than criminals, the government should also ensure that all departments and statutory agencies involved in responding to CCE are provided with clear guidance regarding their role and responsibilities. A shared strategy for tackling CCE and updated statutory guidance accordingly should also be developed. This could be facilitated through the expansion of the COVID-19 Vulnerable Children's Hub which is already coordinating policy, programmatic and funding responses.

4.3.3. Issue official guidance on formalising data-sharing practices between relevant agencies and across geographic boundaries.

Multi-agency working across organisational and geographical boundaries is often complicated by a lack of formalised data-sharing processes. Without such processes being in place, information may not be shared in a timely manner, resulting in missed opportunities to intervene and an exacerbation of the risks experienced by vulnerable children.

There has historically been a lack of government support for formalised data sharing, although the introduction of the Serious Violence Duty in 2021, which requires specified authorities to work together within existing local structures to prevent and reduce serious violence, may go some way towards addressing this. The issuance of official, in-depth guidance on data collection and sharing across different agencies is expected to improve data collection practices and information sharing, and consequently increase the likelihood of children receiving the necessary support at the right time.

4.3.4. Issue official guidance regarding the implementation of standardised responses to indicators of potential County Lines involvement.

The lack of standardised responses to indicators of potential County Lines involvement such as challenging behaviour in school, threat of exclusion and missing episodes presents a barrier to effective responses to youth violence and to County Lines activity specifically. Responsibility for responding to such indicators tends to fall to local authorities and statutory services but, as we have seen, the efficacy of these responses varies wildly between areas. The government should therefore be the lead in formally instituting partnership working between agencies across organisational and geographic lines in response to indicators of potential County Lines involvement and should issue official guidance outlining best practice in identifying and responding to these indicators.

4.3.5. Provide an accessible, national platform for local practitioners to use existing evidence on what works to inform their practice.

There is a wealth of information available on how to support children at risk



of CCE, but at present it is not always easily accessible by practitioners, thus preventing them from using it to inform their practice and improve services. The collation of all relevant resources via a single collaboration platform (à la 'Future NHS') would allow practitioners to access and exchange evidence-based practice, knowledge and information on disrupting County Lines activity and supporting victims of CCE. Facilitating such collaboration between practitioners across the country can reduce barriers to information sharing, encourage professional curiosity and support continued professional development.

4.3.6. Provide increased, longer-term funding, particularly to support person-centred approaches.

Inadequate funding for local children's services, schools and local authorities can undermine the effectiveness of local responses to youth violence and County Lines activity. Much of the available literature emphasises the importance of providing children at risk of criminal exploitation with support and opportunities for avoidance of, or desistance from, criminal activity. The government must recognise the need for increased funding, especially for specific focus on early help, intervention, and person-centred approaches. They should offer longer-term financial support through increased budgets for local authorities to be spent on children's services and schools, or through targeted investment in community-led initiatives in disadvantaged areas.



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