

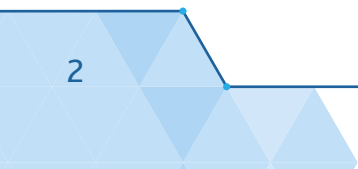
County Lines Exploitation

Practice guidance for YOTs and frontline practitioners

Published by the Ministry of Justice on 1 October 2019

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Executive Summary

The key focus of this guidance is to provide clear referral pathways for frontline practitioners to follow nationally and use as a best practice template, when responding to, and safeguarding children involved in county lines. The key objective of this guidance is to increase national consistency, better co-ordinate the response to county lines and improve safeguarding of children who are being exploited through county lines.

This is practice guidance, not statutory guidance. The referral pathways included in this practice guidance are recommended as a source of best practice for frontline practitioners.

These pathways consider the devolved nature of local authorities and Youth Offending Services in England and Wales, so please be aware that not all processes included may be applicable to your local area.

Visual aids included in this practice guidance are intended as a concise summary of each referral pathway. We advise these should be read and applied in conjunction with the accompanying text.

The three key visual aids in this practice guidance summarise:

- Internal Police Referral Pathways
- Safeguarding Referral Pathways for Children
- The National Referral Mechanism (NRM)

Wider contextual information is included in this practice guidance for frontline practitioners to make use of. This includes further information on the National Referral Mechanism process, useful legislation to be aware of, guidance on how to utilise Risk Orders (and other useful orders if the NRM process has been unsuccessful), as well as useful toolkits and training resources available for practitioners online.

We advise frontline practitioners to familiarise themselves with these referral pathways and contextual information to encourage a more holistic and multi-agency approach when responding to county lines.

1. Introduction

1.1 Who is this guidance for?

This guidance is primarily aimed at frontline staff in Youth Offending Teams (YOTs) in England and Wales, and HMPPS practitioners who work with children involved in county lines. While not the primary audience, this guidance may also be useful for frontline practitioners who work with vulnerable adults who may be victims of county lines.

This guidance may also be useful for other professionals and stakeholders (including children's services, youth services, adult services, education, health, housing, benefits, law enforcement (police) and related partner organisations) involved in county lines, as well as carers and parents, although these groups are not the primary audience.

Some contextual information included in this practice guidance, including the National Referral Mechanism, is also applicable for Northern Ireland and Scottish practitioners.

This guidance has been produced by the Ministry of Justice in collaboration with other Government departments.

1.2 What is this guidance for?

County lines is a major, cross-cutting issue involving drugs, violence (including sexual violence), gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies, and voluntary and community sector organisations.

The key focus of this guidance is to provide clear referral pathways for frontline practitioners to follow nationally and use as a best practice template when responding to and safeguarding children involved in county lines. The key objective of this guidance is to increase national consistency, better co-ordinate the response to county lines and improve safeguarding of children who are being exploited through county lines.

The referral pathways included in this practice guidance are not statutory, they are recommended as best practice only.

1.3 County lines description

County lines drug dealing is a national issue involving organised drug dealing networks exploiting children and vulnerable adults to move, hold and sell Class A drugs across the UK, using dedicated mobile phone

lines to take orders. Although Class A drug supply underpins county lines offending, exploitation remains integral to the business model and county lines offenders recruit, transport and exploit children and vulnerable adults to carry out activity including preparing, moving, storing and dealing illegal drugs.

The victims are often children, commonly males aged 15 to 17 years, who are groomed with money, gifts or through sexual and violent relationships, and forced to move, store and deal, Class A drugs. Children as young as 11 years of age have been reported as being exploited. It is important to stress here that child victims can be both male and female. Methods of control include:

- Debt bondage, including staged robberies;
- Sexual abuse, particularly against females, including for blackmail and humiliation purposes;
- Violence (real and threatened) is used to coerce victims to become dealers, enforce debts, and use victim's accommodation as an operating base;
- Kidnap against victims and their families.

County lines and the associated violence, drug dealing and exploitation has a devastating impact on children, vulnerable adults, families and local communities.

The UK Government defines county lines as:

"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."

This practice guidance focuses specifically on the exploitation of children through county lines.

1.4 The Government's approach to youth justice and county lines

The Government approach to youth justice continues to recognise and promote the safeguarding of children as the primary objective, to see the child first and the offender second. All work by professionals should be child-centred and child-focused. County lines and criminal exploitation cases are extremely nuanced and must be handled on a case-by-case basis.

The County Lines Working Group, chaired by the Home Office, was set up in 2016 to drive delivery of a cross government and agency programme of work

to tackle county lines. The Group met for the first time in November 2016 and through delivery of a 12-month programme of work, focused on building understanding and evidence, raising awareness in police forces and key sectors (including housing, health, and children's social care), and providing training, tools and capacity building in the law enforcement response, including the introduction of the Drug Dealing Telecommunications Restriction Orders Regulations (DDTROs).

A second phase of work has focused on building new national capability, embedding new tools and operationalising guidance, including the establishment of the National County Lines Coordination Centre (NCLCC) launched in September 2018, which is supported by £3.6m of Home Office funding.

1.5 Seeing children as exploited victims and not perpetrators

Child trafficking and exploitation is often accompanied by various types of control, such as violence, the threat of violence, sexual abuse, alcohol and drug abuse, emotional abuse, manipulation, and imprisonment, to suppress victims and ensure their compliance. For that reason, victims may not fully cooperate with an investigation or prosecution for fear of reprisals or because they do not recognise that they are being exploited. Offenders may also attempt to abduct or coerce the child whilst criminal proceedings are ongoing, including while the child might be being cared for by the local authority.

Children can also be exploited to commit criminal acts on behalf of their trafficker/exploiter. Where it is found that the child committed an offence as a direct consequence of their situation, prosecutors should follow the Crown Prosecution Service (CPS) guidance on the approach to prosecuting county lines offences, including a focus on the Modern Slavery Act 2015, which can be found at <https://www.cps.gov.uk/legal-guidance/drug-offences>, and, where appropriate, consider whether there is clear evidence of the statutory defence.

Police should be conscious that children who are encountered as offenders, or alleged offenders, are entitled to the same safeguards and protection as any other child, and due regard should always be given to their safety and welfare.

While children appear to have status in an organised drug dealing network and enjoy the benefits associated with this, we ask that frontline practitioners consider how and why this child became associated with the organised drug dealing network in the first instance.

At what age did the child first become associated with the organised drug dealing network and under what circumstances? Was the child targeted, groomed and/or coerced by the organised drug dealing network? Is the child now so entrenched in this lifestyle that they do not present as being a victim? Children can be both victims and perpetrators. Children, especially older children, can often present as perpetrators when in fact they are victims of exploitation, and identification of victims by police and local authorities can be extremely difficult.

1.6 National picture of county lines

County lines is a growing national issue and there are now over 2,000 separate mobile phone lines (compared with 700-1000 lines estimated in 2017) with upwards of £0.5 billion annual turnover.

The biggest exporting areas are Metropolitan Police Service (MPS), West Midlands and Merseyside but increasing numbers of police forces are reporting their areas to be Class A drug exporters; 26 forces in 2018 compared with 13 forces in 2017.

Importing towns and areas are supplied by multiple lines, and while heroin remains the most frequently supplied drug, the use of crack cocaine is increasing.

Exploitation and violence remain key elements of county lines but there are significant intelligence gaps because of data limitations.

The latest National Crime Agency's (NCA) County Lines Assessment was published in early 2019 and shows county lines to be a growing issue. Further information can be found at:

<https://nationalcrimeagency.gov.uk/who-we-are/publications/257-county-lines-drug-supply-vulnerability-and-harm-2018/file>

2. Safeguarding terminology

2.1 What is Child Criminal Exploitation?

There is no statutory definition of Child Criminal Exploitation (CCE) but it is a term increasingly used to describe this type of exploitation where children are involved in county lines activity. The Government defines CCE as:

"Child Criminal Exploitation is common in county lines and 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. 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.”

Note: while some agencies refer to Child Criminal Exploitation and county lines interchangeably, CCE is much broader than just county lines, as county lines is only one subset of CCE. CCE includes other types of exploitation, including forced labour, forced theft, benefit fraud, acquisitive crime, drug cultivation/production, etc.

2.2 What is Child Sexual Exploitation?

Frontline staff should be aware of the prevalence and magnitude of Child Sexual Exploitation (CSE) in county lines activity for both female and male children. The Government definition of CSE in the [Department for Education Child Sexual Exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation](#) is:

“Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.”

The full document can be found at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

Note: Increased awareness amongst frontline practitioners and wider services, regarding the scale of both CCE and CSE within county lines, and recognition of the parallels between CCE and CSE, could lead to significantly changed perceptions of exploited children, a subsequent change of behaviour towards children, and a resulting shift in safeguarding processes to encompass CCE on a similar footing to CSE.

2.3 Safeguarding children from extra-familial harms

It is important to recognise that children may be vulnerable to abuse or exploitation from outside their families (extra-familial harm) as well as harms to their welfare from within their families. These extra-familial harms might arise at school and other educational

establishments, from within peer groups, or more widely from within the community and/or online. These harms can take a variety of different forms and children can be vulnerable to multiple harms, including exploitation by organised drug dealing networks such as county lines.

Further information on safeguarding children from extra-familial harms can be found in the [Department for Education’s Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children](#) at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778224/Working_Together_to_Safeguard_Children_2018.pdf

3. Indicators of county lines exploitation

3.1 Signs that a child may be being exploited through county lines

Children exploited through county lines may exhibit some of these signs, either as a member or as an associate of an organised drug dealing network. Any sudden change in a child’s lifestyle should be discussed with the child.

Some potential indicators of county lines exploitation are listed below, with those at the top being of particular association with county lines:

- Persistently going missing from school, home, care
- Children travelling to locations, or being found in areas they have no obvious connections with, including seaside or market towns
- Unwillingness to explain their whereabouts
- Unexplained acquisition of money, clothes, accessories or mobile phones which they are unable to account for
- Excessive receipt of texts or phone calls
- Children having multiple mobile phone handsets or sim cards
- Withdrawal or sudden change in personality, behaviour or language used
- Relationships with controlling or older individuals and groups
- Leaving home or care without explanation
- Suspicion of physical assault or unexplained injuries

- Parental concerns
- Carrying weapons
- Significant decline in school results or performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being.

Further indicators for professionals to be mindful of:

- An increase in possession with intent to supply offences outside your local area
- Matrix nominals being stopped outside your area (local police forces will hold this data)

Youth Offending Services might wish to analyse the details of those children who have appeared in courts outside of their home area, to build up a picture of why these offences happened.

Please note this list is not exhaustive, and you should seek advice from your safeguarding lead if you are concerned. These are safeguarding issues and should be reported to your safeguarding lead.

Practitioners should be aware that organised drug dealing networks are now targeting a new demographic of children, often referred to as “clean skins”, who are not previously known to local authorities.

Practitioners should also note that this is constantly evolving environment. There is a new term: ‘blurred lines’ which refers to a situation where gangs and organised drug dealing networks are stopping using certain vulnerable Young Persons because their known vulnerability is attracting additional law enforcement attention. These Young Persons, having seen the county line tactics and made some contacts, are establishing their own generally more local drug dealing networks, hence the term ‘blurred lines’.

3.2 Risk of Harm, Safety and Wellbeing Assessments

Youth Offending Services and Police Forces should be aware there is a potential for traditional risk assessments to underestimate the risk of harm posed to the child, as well as to their safety and wellbeing (particularly if a child is not previously known to the Gangs Matrix or local authority), despite there being indications of Child Criminal Exploitation and/or Child Sexual Exploitation through county lines.

Frontline practitioners need to be aware of the signs of county lines exploitation, to escalate risk ratings, follow safeguarding practices and notify the police where appropriate.

3.3 Signs for HMPPS officials to be mindful of

Some potential indicators of county lines exploitation within the secure youth estate, and the adult custodial estate, for HMPPS professionals to be mindful of are listed below:

Be aware that female and child visitors are increasingly targeted by organised drug dealing networks to transport drugs into the secure youth estate and the adult estate;

Be perceptive to when visitors are unsure who the individual is that they are visiting, and do not recognise the individual they are visiting. One method to test this theory might be not to tell the visitor what table the individual is sitting at to test whether the visitor knows who the individual is;

Monitor whether other more mature Serious Organised Crime (SOC) offenders, particularly those known to be associated with county lines, within the youth and adult custodial estates, are taking an interest in a new individual, especially if that new individual has been associated with county lines;

In the secure youth estate, some children are targeted by other children, which is often orchestrated by organised drug dealing networks and adult perpetrators within the community.

Note: since early 2019 HMPPS and the National Crime Agency (NCA) have had a Memorandum of Understanding to share information concerning victims of county lines, including children and vulnerable adults.

3.4 What should HMPPS officials do if they suspect exploitation through county lines?

Contact the local authority Children’s Services and Youth Services and follow local safeguarding procedure, as advised;

Contact the local police force, and follow local police procedure, as advised;

Where appropriate, contact the Regional Organised Crime Unit;

Where appropriate, follow the National Referral Mechanism (NRM) process (see Section 5).

3.5 Regional Organised Crime Units

Regional Organised Crime Units are building a national county lines picture using information from cross-cutting agencies. If you identify an individual, including children and vulnerable adults, that you believe may be a county lines perpetrator (responsible for orchestrating county lines exploitation, grooming and drug-dealing) please contact your Regional Organised Crime Unit (ROCU).

Regional Organised Crime Units should only receive information about members of the public visiting secure estates or county lines perpetrators who they believe are involved in running county lines. ROCUs do not have the capacity to receive information about potential victims of county lines exploitation who are also serving prisoners.

3.6 HMPPS Intelligence Policy

Any intelligence received which may indicate vulnerability to exploitation, or involvement in county lines should be recorded in line with organisational policies. Details of this for HMPPS staff are contained within the **Intelligence Collection, Management and Dissemination Policy Framework** (published March 2019) and are available via the HMPPS Intranet and the associated operations manual. Staff in Youth Custody Services (YCS) establishments using the Mercury Intelligence System must refer to the **Intelligence Policy Framework** for mandated recording instructions.

Where the intelligence originates from another source, such as Law Enforcement, any handling code appended to the Intelligence must be observed (see the **Intelligence Operations Manual** for more information). At no point should the original intelligence record, or the evaluation and handling code be disclosed to the subject of the report (i.e. the offender).

4. Referral pathways

This is practice guidance, not statutory guidance. The referral pathways included in this practice guidance are however recommended as a source of best practice for frontline practitioners.

Please note there may be local deviation in referral pathways and terminology referenced in this guidance.

4.1 What to do if you suspect a child may be involved in county lines

Any practitioner working with a child who they believe may be at risk of county lines exploitation should follow their local safeguarding procedures and share this information as advised. If you believe a person is in immediate risk of harm, you should contact the police.

Use your local safeguarding process, the first step of which is usually to contact your designated safeguarding lead within your organisation. If you don't know who this is, refer to your manager. Your designated safeguarding lead has the responsibility for linking in with your local authority's social services. If you are not satisfied with the local authority's response, you should follow up your concerns by discussing these with your safeguarding lead.

It is crucial that a multi-agency approach is taken and following an initial Multi-Agency Safeguarding Hub (MASH) meeting (or local equivalent) the following core teams should communicate and collaborate frequently to ensure appropriate safeguarding of the child is followed through:

- i. Local Authority children's services social worker/ multi-agency safeguarding hub (to make the initial decision on course of action following referral)
- ii. Local Authority Children's Services Social Worker (to complete child and family assessment)
- iii. Youth Offending Team/Service Worker
- iv. In areas where the Independent Child Trafficking Guardian¹ (ICTG) provision is available, an ICTG should also be invited to the MASH meeting or local equivalent.

¹ **Greater Manchester**, comprising the following local authorities - Manchester; Trafford; Tameside; Rochdale; Wigan; Oldham; Stockport; Salford; Bolton and Bury. **Hampshire & the Isle of Wight**, comprising the following Tier 1 authorities - Hampshire and Isle of Wight (including relevant district councils as appropriate), Portsmouth and Southampton and any Tier 2 district authorities.

Wales, comprising - Cardiff City and County Council; Vale of Glamorgan Council; Merthyr Tydfil County Borough Council; Rhondda Cynon Taf County Borough Council; Blaenau Gwent County Borough Council; Caerphilly County Borough Council; Monmouthshire County Council; Newport City Council; Torfaen County Borough Council; Carmarthenshire County Council; Ceredigion County Council; Pembrokeshire County Council; Powys County Council; Conwy County Borough Council; Denbighshire County Council; Flintshire County Council; Gwynedd County Council; Isle of Anglesey County Council; Wrexham County Borough Council; Bridgend County Borough Council; Swansea City and County Council and Neath Port Talbot County Borough Council.

West Midlands, comprising the following local authorities - Birmingham City Council, Coventry, Dudley, Sandwell, Solihull, Walsall, and Wolverhampton.

East Midlands, comprising the following local authorities - Derby, Derbyshire, Leicester, Leicestershire, Lincolnshire, Northamptonshire, Nottingham, Nottinghamshire, Rutland.

London Borough of Croydon. (ICTG service due to be implemented April 2019).

If the child is of serious concern, local authority social workers, the police or NSPCC should use their statutory child protection powers to act immediately to secure the safety of the child. There should be an emergency meeting (immediate strategy discussion) within 24-72 hours of the serious concern being noted.

4.2 Borough County Lines Strategy Meetings as a mechanism to share best practice

County lines often involves Serious Organised Crime and children travelling across boroughs, police force areas and local authority boundaries, which is why close working across boroughs, police force areas, and local authority boundaries is so important.

Borough strategy meetings involve key practitioners and stakeholders (including early intervention hubs, children's services, YOT workers, police and health) and are an effective mechanism to share best practice, review key challenges and solutions, and develop forward-looking, multi-agency strategies.

Inter-borough strategy meetings would be an opportunity to take this one step further, and create an even more collaborative and joined-up multi agency approach. The practical logistics and feasibility to pursue inter-borough strategy meetings would require initiative and engagement between boroughs, and is a recommended solution to share best practice more widely.

4.3 Information sharing and between areas movement of children

Early identification of victims and a timely response by professionals is crucial to safeguarding children, as well as identifying and tackling county lines exploitation. The success of the county lines model for drug dealing is due, in part, to dealers exploiting the lack of intelligence and lack of system join up across geographical and administrative boundaries in the UK. A collaborative, multi-agency approach is paramount and information sharing by key stakeholders, including local authority children's social services, youth offending services, police forces, housing, health, schools, missing/return home interviews, care/fostering and other frontline practitioners, is crucial.

Youth Offending Services face substantial difficulties in undertaking safety planning for children who are suspected of being trafficked and exploited through county lines. Planning to keep these children safe is difficult as it is based on action that could only be taken if the child was in the local area. YOTs are limited in the action they can take when the child is out of area, and the child needs to be protected by the police force or children's social care department in a different local authority area.

The home area of the child always retains responsibility for the child, wherever they are found.

The challenge is for the home area social workers and police forces to have out of hours resources to collect and safeguard children when they are outside of their home area. The traditional area-based child protection system struggles to address the unique and complex difficulties when children are trafficked or exploited between areas through county lines drug-dealing.

Greater communication between YOTs, local authority children's services and local police forces is required to address this issue and ensure between areas movement of children is monitored and controlled, as outlined in the best practice referral pathways below.

Any information-sharing must be compliant with the Data Protection Act 2018.

Note: When a child is Released Under Investigation (RUI) local safeguarding rules should apply.

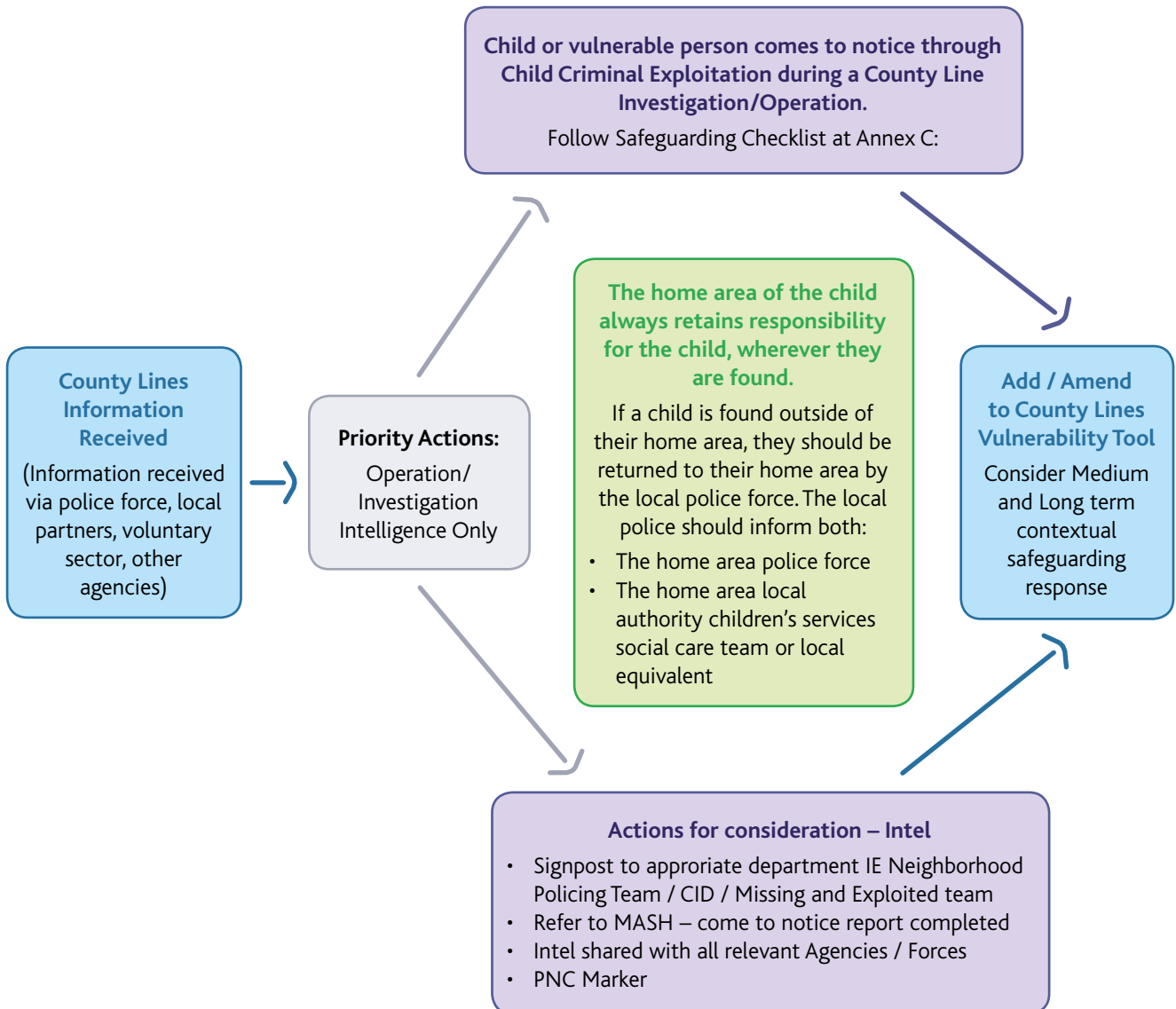
4.4 Best Practice Referral Pathways

Figure 4.5 includes best practice referral pathways recommended for police forces to follow when they believe a child may be a victim of county lines exploitation.

Figure 4.6 includes best practice referral pathways recommended for Youth Offending Teams, Local Authority Children's Services, education, housing and other frontline practitioners to follow when they believe a child may be a victim of county lines exploitation.

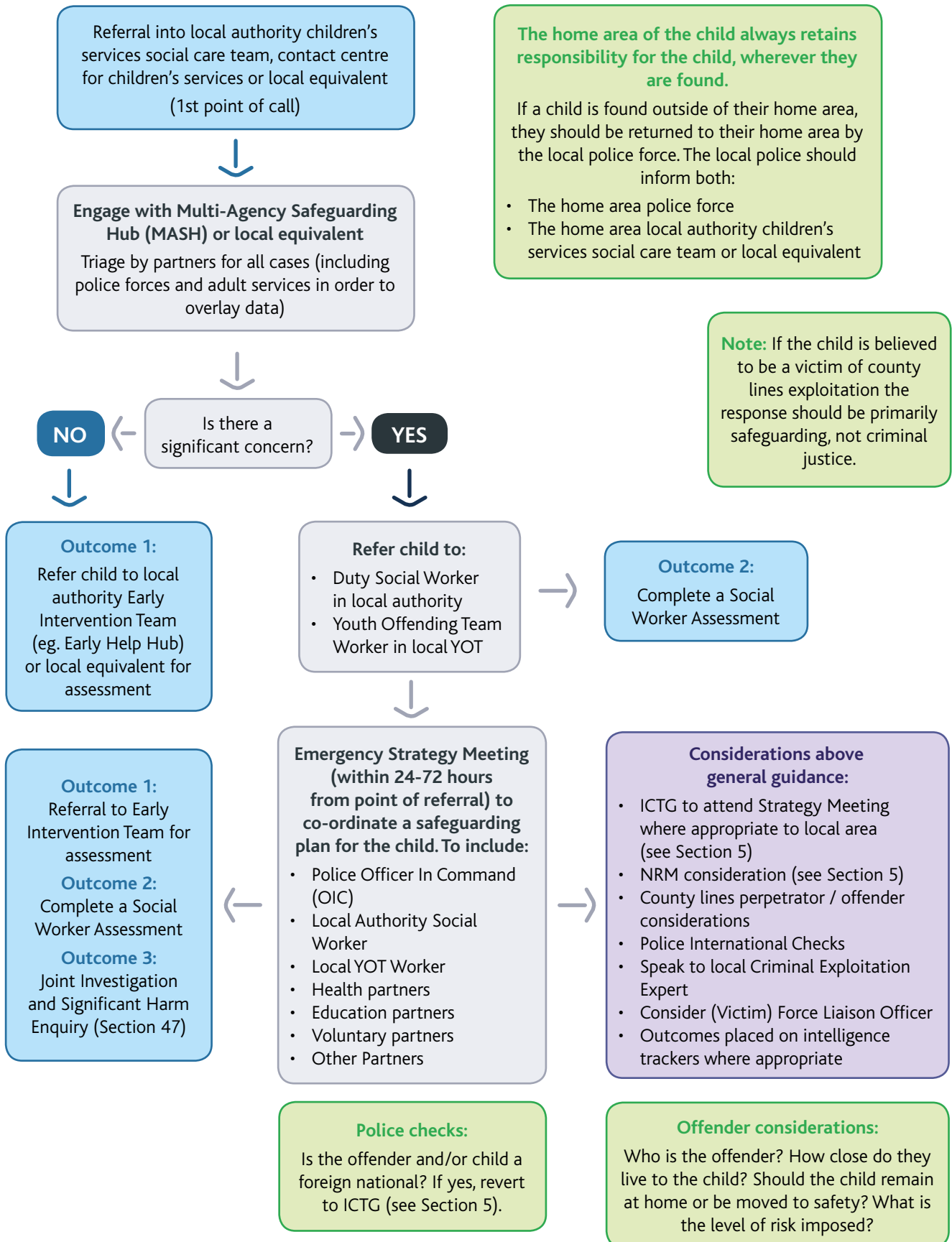
4.5 Best Practice Police Referral Pathways – for use when responding to possible exploitation through county lines

Note: These pathways consider the devolved nature of local authorities and Youth Offending Services in England and Wales, please be aware that not all processes included may be applicable to your local area.



4.6 Best Practice Safeguarding Process for Children – for use when responding to possible exploitation through county lines

Note: These pathways consider the devolved nature of local authorities and Youth Offending Services in England and Wales, please be aware that not all processes included may be applicable to your local area.



5. National Referral Mechanism (NRM)

5.1 National NRM Context

Youth Offending Teams, police and other frontline practitioners should refer children to the National Referral Mechanism (NRM) when they believe a child that is a victim of county lines may also be a victim of modern slavery trafficking.

Note that any referral made should be after appropriate safeguarding steps have been taken and in light of multi-agency discussions.

5.2 Overview of National Referral Mechanism Process

1. Under the existing NRM process potential victims of modern slavery are referred by 'First Responders' to the 'Single Competent Authority' (SCA) located within the Home Office. It is the role of the SCA to consider whether an individual is a victim of slavery, servitude or forced or compulsory labour or human trafficking.

a. First Responders includes several public bodies, specified Non-Government Organisations and law enforcement officers. This link provides a list of first responders. <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>

b. First Responders should:

- In the case of a child, contact the Local Authority to ensure that safeguarding procedures and provisions are put in place;
- In areas where there is an Independent Child Trafficking Guardian² (ICTG) service, the 'first responder' should contact the ICTG service by completing a dedicated pro-forma and sending it to trafficking.referrals@bypmk.cjsm.net;

- The first responder can also contact the ICTG service using the following 24-hour support line telephone number: 0800 043 4303;
- Make an NRM referral to the SCA where they suspect slavery or trafficking has occurred using the referral form and following the instructions for submission. When completing this form in relation to suspected county lines activity, it must be made clear that the trafficking was for the purposes of criminal exploitation.
- From summer 2019 first responders will need to submit a digital referral to the SCA;
- Advise the law enforcement agency who investigated the original offence that trafficking/slavery is now also suspected. NB: the NRM does not replace or supersede wider safeguarding obligations; the police and relevant local authority Children's Services must be alerted of any immediate concerns or safety in the usual way.
- Advise relevant law enforcement and criminal justice agencies that the individual has been referred through the NRM for victim identification, if this has not already occurred.

Important points to note:

- a. All law enforcement officers can refer potential victims of trafficking/slavery to the NRM.
- b. Moreover, non-First Responder organisations who may encounter trafficked children should contact police. The police will then be able to make the required referrals.
- c. Children do not have to consent to be referred into the NRM. However, it is good practice to explain the process and purpose of the NRM to them;

Referring children through the NRM: In the case of potential victims who are, or appear to be, children, the most important action to undertake is to ensure the child is safeguarded. To do this, the

² **Greater Manchester**, comprising the following local authorities - Manchester; Trafford; Tameside; Rochdale; Wigan; Oldham; Stockport; Salford; Bolton and Bury. **Hampshire & the Isle of Wight**, comprising the following Tier 1 authorities - Hampshire and Isle of Wight (including relevant district councils as appropriate), Portsmouth and Southampton and any Tier 2 district authorities.

Wales, comprising - Cardiff City and County Council; Vale of Glamorgan Council; Merthyr Tydfil County Borough Council; Rhondda Cynon Taf County Borough Council; Blaenau Gwent County Borough Council; Caerphilly County Borough Council; Monmouthshire County Council; Newport City Council; Torfaen County Borough Council; Carmarthenshire County Council; Ceredigion County Council; Pembrokeshire County Council; Powys County Council; Conwy County Borough Council; Denbighshire County Council; Flintshire County Council; Gwynedd County Council; Isle of Anglesey County Council; Wrexham County Borough Council; Bridgend County Borough Council; Swansea City and County Council and Neath Port Talbot County Borough Council.

West Midlands, comprising the following local authorities - Birmingham City Council, Coventry, Dudley, Sandwell, Solihull, Walsall, and Wolverhampton.

East Midlands, comprising the following local authorities - Derby, Derbyshire, Leicester, Leicestershire, Lincolnshire, Northamptonshire, Nottingham, Nottinghamshire, Rutland.

London Borough of Croydon.

local authority where the child has been identified should be contacted immediately so that they can put safeguarding procedures in place to support the child. Once the local authority has been contacted, the First Responder should make a NRM referral as set out above.

2. Following a NRM referral, the competent authority will initially make a **'reasonable grounds' decision**.

3. A positive reasonable grounds decision is made when there are reasonable grounds to believe the individual is a potential victim of human trafficking/slavery. This means "I suspect, but cannot prove" that the individual is a victim. **The competent authority aims to make reasonable grounds decisions within 5 working days of receiving a referral.**

- If an adult receives a positive reasonable grounds decision, they are entitled to government funded support during a recovery and reflection period of 45 days.
- **However, in respect of children, local authorities have statutory responsibilities to safeguard and promote the welfare of all children in their area. The child's immigration or trafficking status does not affect this legal responsibility. Trafficked children are protected by the statutory duties placed on local authorities under the Children Acts 1989 and 2004 to safeguard and promote the welfare of children.**

4. If the potential victim receives a positive reasonable grounds decision, then they will be entitled to a 45-day recovery and reflection period. This period enables the competent authority to collect further evidence about the case and the victim to make a **'conclusive grounds' decision**, which assesses, on the balance of probabilities, whether 'it is more likely than not' that the person is a victim of modern slavery or human trafficking.

5. The time taken to reach a conclusive decision may be affected by the availability of supporting evidence. Not all the individuals who are referred to the NRM will be considered to be victims of modern slavery or human trafficking following a conclusive decision.

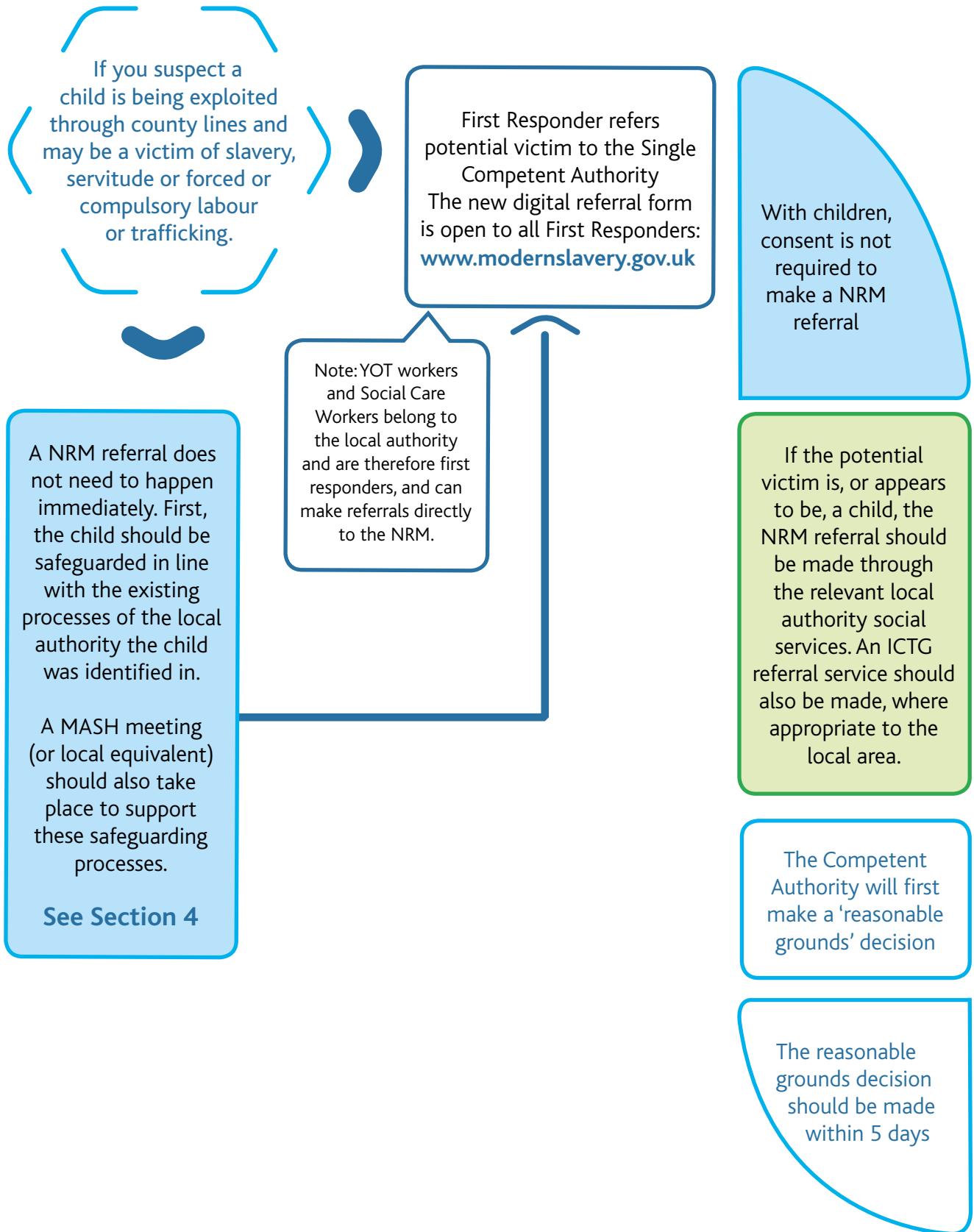
6. In support of Home Office Counting Rules (HOCR) requirements, NRM referrals are now screened against the below criteria to identify the geographical police force. Once identified,

the referral is transmitted within one working day to the relevant Force Intelligence Bureau (FIB) or stipulated point of receipt within force for action. The reasonable grounds decision, once made, is subsequently notified to the force by the competent authority.

7. Criteria applied to identify relevant geographical police force:

- The force has acted as first responder or the referral indicates that the force is already involved in the recording/investigation of the potential modern slavery human trafficking offences; or
- The potential victim has been exploited within the force area; or
- The potential victim has been exploited abroad, or at an unknown location and the victim's address at time of referral is within the force area; or
- The potential victim has been exploited abroad or at an unknown location and they have presented to another first responder within the force area.

5.3 Overview of National Referral Mechanism Process



Note: There are two separate elements: (a) is the child a victim of modern slavery/trafficking; (b) is the child able to rely on the Section 45 statutory defence. The child could be a victim but not able to rely on the statutory defence if, for example, there was no connection between the slavery / trafficking and the offence

The time taken to reach a conclusive grounds decision may be affected by the availability of supporting evidence. Not all potential victims who are referred to the NRM will ultimately be assessed to be modern slavery victims.

The conclusive grounds decision will not be taken within the first 45 days to allow the victim time for recovery and reflection

The Competent Authority then collects further evidence about the case/potential victim to make a 'conclusive grounds' decision

If a positive decision is made, this means "I suspect, but cannot prove" that the child is a victim

If a positive decision is made, this means "it is more likely than not" that the child is a victim of modern slavery

Local authorities have responsibilities to support potential child victims of modern slavery under existing statutory child protection arrangements

The criminal courts are likely to take into consideration the NRM decision in their proceedings.

Note: A conclusive grounds NRM decision is not made to the criminal standard of proof and so the courts are not bound by the SCA decision.

If you suspect a child is being exploited through county lines and may be a victim of slavery, servitude or forced or compulsory labour or trafficking.

5.4 If there is a positive NRM reasonable or conclusive grounds decision

If a child is found to be a victim of slavery or trafficking through a conclusive grounds decision, this does not unlock additional support for the child, further to what the local authority already provides. It could, however:

- Inform the opinion of local authorities, such that the child is viewed as a victim and not a perpetrator – this could change the perception of the child's circumstances and the nature of the alleged offending and may influence their court/legal proceedings;
- Increase the level of priority given to the child, specifically by their local authority which may shift the child further up the priority list for support to be received from their local authority urgently;
- The outcome of an NRM decision may have a bearing on any criminal justice proceedings which may have been instigated against the child, for example where a child has been charged, or is being prosecuted for drug offences. This is particularly likely in circumstances where the statutory defence against prosecution has been raised by a defendant (Section 45 of the Modern Slavery Act 2015).

Note that CPS guidance on [Human Trafficking, Smuggling and Slavery](#) provides that prosecutors should:

- Take into account a NRM decision;
- Consider a conclusive grounds decision to be of more weight than a reasonable grounds decision;
- Make enquiries, where there is a reasonable grounds decision only, about when a conclusive decision is likely to be made;
- Examine the cogency of the evidence on which the Competent Authority (CA) relied. The decision of the CA as to whether a person had been trafficked for the purposes of exploitation is not binding on the Crown Court or the Crown Prosecution Service (CPS). Unless there was evidence to contradict it or significant evidence that had not been considered, it is likely that the criminal courts will abide by the decision as a finding of fact/take the decision into account;
- The decision should be scrutinised by the prosecutor to see to what extent the evidence has been analysed, weighed and tested by the CA and to assess the quality of any expert evidence relied upon;

- There will be cases where a threshold test charging decision needs to be made before the competent authority (CA) decision is known. Guidance on the application of the threshold test can be found in the 10th edition of the Code for Crown Prosecutors.

Further details on the non-punishment principle for victims of slavery and trafficking and the Section 45 statutory defence can be found on the CPS website, available at: <https://www.cps.gov.uk/legal-guidance/human-trafficking-smuggling-and-slavery>

5.5 Section 45 of the Modern Slavery Act 2015 – Defence for slavery or trafficking victims who commit an offence

The Modern Slavery Defence is the statutory defence for slavery or trafficking victims who commit an offence.

Section 45 of the Modern Slavery Act 2015 provides a defence for victims who commit certain offences when they are compelled to do so (in the case of adults) or when they commit them as a direct consequence of being a victim of slavery/exploitation, if a reasonable person, in the same situation with the same “relevant characteristics” would do the relevant act (in the case of children).

Where there is an arrangement or facilitation of travel by another, with a view to exploitation, an offence under section 2 of the Modern Slavery Act 2015 (human trafficking) may have been committed. In these circumstances, regard should be had to the victim's age in determining their vulnerability.

If the victim states they are a child, they should be viewed as such until their age can be verified by identification or an independent age assessment carried out by the local authority or a court determination. Section 51 of the Modern Slavery Act 2015 provides for presumption about age. Until an assessment is made of the person's age by the local authority, there is an assumption that the person is under 18.

There are various forms of exploitation listed in Section 3 of the Modern Slavery Act 2015. See <https://www.cps.gov.uk/legal-guidance/human-trafficking-smuggling-and-slavery> for further information.

5.6 Independent Child Trafficking Guardians (ICTGs)

The Government is committed to the full national roll out of Independent Child Trafficking Guardians (ICTGs) across England and Wales. The ICTG provision is

currently available in Greater Manchester, Hampshire, Wales, West Midlands, East Midlands and the London Borough of Croydon.

ICTGs provide one-to-one support for children who have no parental responsibility for them in the UK. This includes unaccompanied asylum-seeking children. The main aim and purpose of the ICTG is to advocate on behalf of the child to ensure the child's best interests are reflected in the decision-making processes undertaken by the public authorities who are involved in the child's care and support, and that the child's well-being is promoted. ICTGs are an independent source of advice for trafficked children. **ICTGs will not replace any existing provisions within a local authority.**

The provision has also recently introduced an expert ICTG regional co-ordinator which will take on a strategic role, working with professionals who are already engaged with and supporting the child (including local authorities, YOTs, social workers and PCCs), rather than directly working with the child. The ICTG regional co-ordinator will focus on children who do not have a figure with parental responsibility for them in the UK, including victims of county lines and CSE. The ICTG regional co-ordinator will not offer one-to-one support for children. Rather, the role of the ICTG regional co-ordinator will aim to adapt to regional differences, both in terms of the nature of trafficking in local areas as well as existing provisions and services. The ICTG regional coordinators will also have in-depth and specialist knowledge of provisions in their local area and be able to offer expert advice to professionals working directly with children on how best to safeguard the children in their care.

5.7 The Slavery and Trafficking Risk Order

The Slavery and Trafficking Risk Orders (STROs) were introduced under section 23 of the Modern Slavery Act 2015 and are applied for by law enforcement at the magistrates' court for an unconvicted defendant.

An Order will be granted if the court is satisfied that there is a risk that the defendant will commit a slavery or human trafficking offence and it is necessary to make the order to protect others from harm. They can be used in two ways:

During an on-going investigation where protection of victims is necessary;

When there is insufficient evidence to prosecute for a Modern Slavery offence but need to restrain activities of suspects or protect victims.

It is possible to apply for an interim order where the decision on an application for a full Slavery and Trafficking Risk Order has not yet been determined. Risk Orders can impose any prohibition on the defendant that the Court deems necessary for the purposes of protecting the public from harm.

Breach of any of the provisions in a Risk Order are punishable with up to 5 years imprisonment.

The provisions to restrict the activities of any defendant must be tailored to the specific activities in which they have been involved and which gives rise to the risks they may pose. For example, in a county lines case, the proposed restrictions could restrict contact with children, either directly or indirectly and by any means. The proposed application would need to refer to any supporting evidence to show contact with children and how that posed risks to them.

Other restrictions could include:

- Not to arrange or provide transport and/or accommodation for any person other than themselves or immediate family;
- Not to provide, by any means, any travel document, ticket, oyster card, travel warrant, mobile phone or sim card to any person under 21 years.

The following hyperlink to the relevant provision in legislation provides greater detail: <http://www.legislation.gov.uk/ukpga/2015/30/part/2/crossheading/slavery-and-trafficking-risk-orders/enacted>

Further guidance is also available here: <https://www.gov.uk/government/publications/slavery-and-trafficking-prevention-and-risk-orders>

However, in pro-active intelligence led and/or covert police investigations there will have to be consideration of whether evidence already obtained and intelligence sources should be disclosed to the defence ahead of any application as the police may not want to show their hand at an early stage of investigation.

6. Useful resources for frontline practitioners

6.1 Useful resources

- The Children’s Society County Lines Toolkit: <https://yjlc.uk/county-lines-childrens-society-toolkit-professionals/>
- Crown Prosecution Service (CPS) typology on the approach to prosecuting county lines offences: <https://www.cps.gov.uk/legal-guidance/drug-offences>
- In October 2017, the Government announced reforms to the NRM, to improve identification of, and support for, victims of modern slavery. Further details about these reforms are available at: <https://www.gov.uk/government/publications/national-referral-mechanism-reform/national-referral-mechanism-reform>
- Victims of modern slavery: Competent Authority guidance: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/791530/victims-modern-slavery-competent-auth-v6.0.pdf
- Interim Guidance for the Independent Child Trafficking Guardians Early Adopter Sites –: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/586796/trafficking_Interim_guidance.pdf
- For further definitions see “Criminal Exploitation of children and vulnerable adults: County Lines guidance”: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf
- Department for Education guidance for the Care of unaccompanied migrant children and child victims of modern slavery statutory guidance for local authorities https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/656429/UASC_Statutory_Guidance_2017.pdf
- Department for Education guidance for Working Together to Safeguard Children: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778224/Working_Together_to_Safeguard_Children_2018.pdf

- Home Office guidance on Slavery and Trafficking Prevention and Risk Orders: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/610015/110417_-_statutory_guidance_part_2_-_GLAA_updates-_Final.pdf

6.2 Relevant legislation for county lines exploitation

- Guardianship (Missing Persons) Act 2017
- Modern Slavery Act 2015
- Children’s Act 1989 and 2004 (To Note: The Children’s Act 1989 is that it does not take account of *contextual safeguarding*. For further information please see the DFE Working Together to Safeguard Children Guidance.)
- Sexual Offences Act 2003
- Human Rights Act 1998
- Child Abduction Act 1984
- Children and Young Persons Act 1933

6.3 Relevant international legislation for county lines exploitation

Article 4 of the European Convention on Human Rights (ECHR) which prohibits slavery and forced labour.

Article 26 of the Council of Europe Anti-Trafficking Convention which requires the United Kingdom to: “... *provide for the possibility of not imposing penalties on victims [of trafficking] for their involvement in unlawful activities, to the extent that they have been compelled to do so*”.

Article 8 of EU Anti-Trafficking Directive 2011/36/EU, whereby “*national authorities are entitled not to prosecute or impose penalties on victims of trafficking human beings for their involvement in criminal activities which they have been compelled to commit as a direct consequence of being subjected to trafficking*”.

The United Nations Convention on the Rights of the Child (UNCRC)

Annex A – Glossary

| | |
|--|--|
| Child | Any persons under 18 years of age. |
| Child Criminal Exploitation (CCE) | <p>CCE occurs when the children are exploited, forced or coerced into committing crimes. County lines is one subset of CCE which encompasses other types of exploitation, including forced labour, forced theft, benefit fraud, acquisitive crime, drug cultivation/production etc.</p> <p>As set out in the Serious Violence Strategy published by the Home Office, 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 using technology.</p> |
| Child Sexual Exploitation (CSE) | <p>CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.</p> |
| County Lines | <p>Children and vulnerable adults who are coerced into transporting drugs or money on behalf of gangs across the country, mostly from urban to more rural areas.</p> <p>As set out in the Serious Violence Strategy, published by the Home Office, 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.</p> |
| Her Majesty's Prison and Probation Service (HMPPS) | <p>Her Majesty's Prison and Probation Service: HMPPS carry out sentences given by the courts, in custody and the community, and rehabilitate people in our care through education and employment.</p> |

| | |
|---|--|
| Independent Child Trafficking Guardians (ICTG) | An Independent Child Trafficking Guardian (ICTG) will provide one-to-one support for children who have no parental responsibility for them in the UK. This includes unaccompanied asylum-seeking children. The main aim and purpose of the ICTG is to advocate on behalf of the child to ensure the child's best interests are reflected in the decision-making processes undertaken by the public authorities who are involved in the child's care and support. Section 48 of the Modern Slavery Act 2015 provides for this provision. |
| Independent Child Trafficking Guardians Regional Co-ordinator | An Independent Child Trafficking Guardian Regional Co-ordinator works strategically across regions to improve the support and processes in place for safeguarding trafficked children. The regional co-ordinator will not offer one-to-one support for children, rather they will work with professionals who are themselves working directly with these children. The role will focus on children who do have a figure with parental responsibility for them in the UK, including victims of county lines and CSE. Section 48 of the Modern Slavery Act 2015 provides for this provision. |
| Local Authority | A local authority is a public body that is responsible for public services and facilities in a particular area. |
| National Referral Mechanism (NRM) | The process by which an individual is identified as a victim of modern slavery or trafficking and ensuring they receive the appropriate support. |
| Safeguarding | A wider term than child protection, it involves promoting a child or young person's health and development and ensuring that their overall welfare needs are met. |
| Youth Offending Service (YOS) / Youth Offending Team (YOT) | Youth Offending Team is the term used in the Crime and Disorder Act 1998 to describe a multi-agency team that is required to coordinate the provision of youth justice services in their area. YOSs are known locally by many titles, such as youth justice service (YJS), youth offending service (YOS), and other generic titles that may illustrate their wider role in the local area in delivering services for children. |

Annex B – Sources

<https://www.gov.uk/government/news/modern-slavery-victims-to-receive-longer-period-of-support>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf

<https://saferlondon.org.uk/2016/09/county-lines-i-need-know/>

<http://www.nationalcrimeagency.gov.uk/publications/national-referral-mechanism-statistics/2017-nrm-statistics/884-nrm-annual-report-2017/file>

<https://www.cps.gov.uk/legal-guidance/human-trafficking-smuggling-and-slavery#a19a>

<http://www.nationalcrimeagency.gov.uk/publications/993-nac-19-095-county-lines-drug-supply-vulnerability-and-harm-2018/file>

<https://yjlc.uk/county-lines-childrens-society-toolkit-professionals/>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778224/Working_Together_to_Safeguard_Children_2018.pdf

<https://vvu-online.com/training/course/view.php?id=3>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/610015/110417_-_statutory_guidance_part_2_-_GLAA_updates-_Final.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/586796/trafficking_Interim_guidance.pdf

Annex C – Safeguarding Checklists



County Line Child (or Vulnerable Person) Immediate Safeguarding Actions Operational Checklists

Context

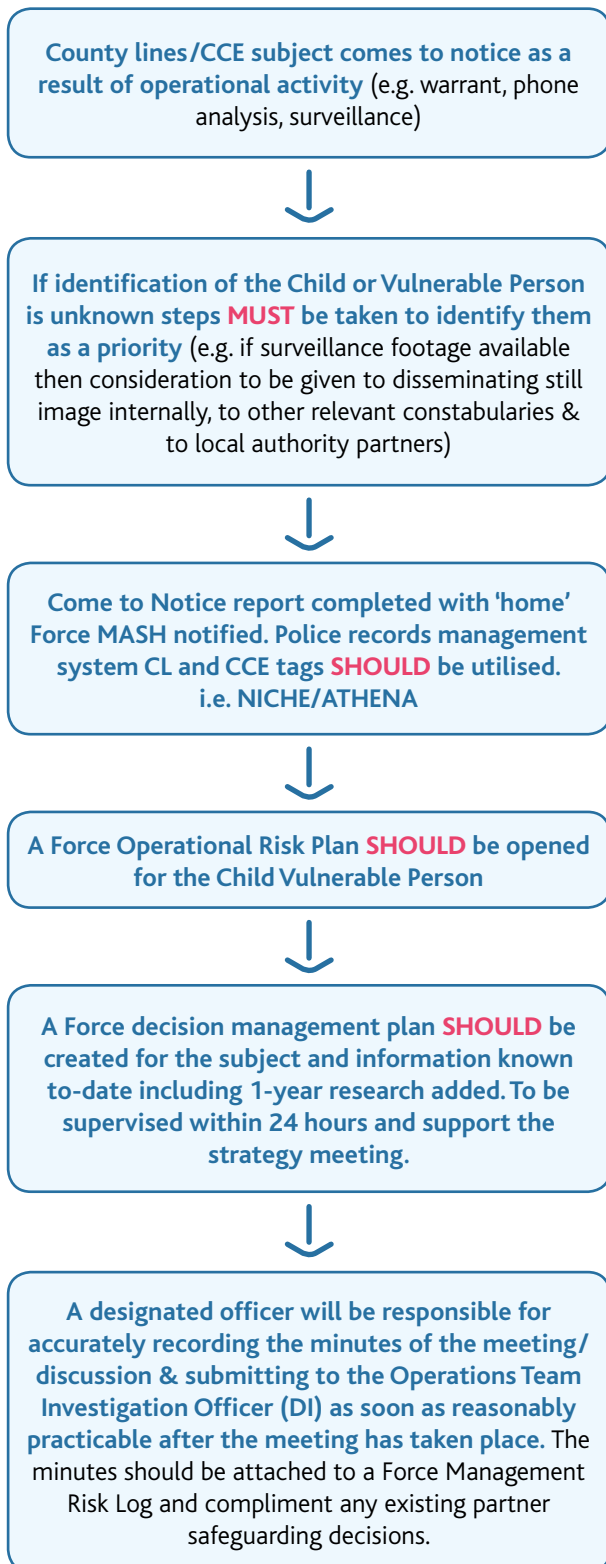
This document is to be used where a child or vulnerable person comes to notice through Child Criminal Exploitation during a county line investigation/operation.

While this checklist is primarily designed for safeguarding procedure around children identified during the course of operational activity, it is good practice to adopt the spirit of this checklist in relation to any vulnerable person identified invoking immediate involvement from the relevant/local social services responsible for adult safeguarding, as well as relevant partner agencies including third sector charities.

| | |
|----------------------------------|--|
| Product Author(s) | NCLCC (NPCC) Rick Sewart, Duncan Evans |
| Quality Assurance | NCLCC (NPCC) Tim Champion |
| Product Owner | NCLCC |
| Handling Conditions | OFFICIAL |
| Date of production & version no. | March 2019 V2 |

Safeguarding Strategy – ‘Child (or Vulnerable Person) Come to Notice’

Immediate Actions Operational Checklist



Upon identification of the Child or Vulnerable Person, an **Emergency Multi-Agency Safeguarding Strategy Discussion (or conference call) SHOULD take place, ideally within 24 hours or as soon as reasonably practicable and MUST involve representation from Social Services where the child resides.**

Other desirable representation may include Local Area Public Protection and professionals currently engaging with the subject. It is a statutory obligation imposed on both the police and social services, to share information (s.10 and 11 of the Childrens Act) and devise a joint agency strategy (s.47 Children Act) so as to take steps to safeguard the child who has been identified as potentially 'at risk of significant harm' (this threshold will effectively always be met where a child is identified as being potentially at risk of gang exploitation).

Generally, the responsibility of the Operations Team will be to conduct investigations into any identified criminal offences, achieving best evidence through Video Recorded Interviews and other enquiries. Social Services should provide a workable plan to mitigate risk of the child being further subject to gang exploitation (this will include completing a needs assessment around the child and considering re-housing short/medium/long-term, referring into diversion schemes, etc).

Agreed action from both agencies including timescales & review points MUST be documented in minutes of the strategy meeting/discussion.

Safeguarding Strategy – ‘Child (or Vulnerable Person) Come to Notice’ Immediate Actions

Operational Checklist

| | |
|----------|---|
| 1 | Operation Name <input type="text"/> |
| 2 | Child/Vulnerable Person Identified as a result of operational activity Yes <input type="checkbox"/> No <input type="checkbox"/> County Lines Yes <input type="checkbox"/> No <input type="checkbox"/> Other CCE type Yes <input type="checkbox"/> No <input type="checkbox"/> <input type="text"/> |
| 3 | VP/Child came to notice Date <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> Time <input type="text"/> |
| 4 | VP/Child identified (if different from point 3 above) Date <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> Time <input type="text"/> |
| 5 | S.47 Strategy Meeting/Conference Call Date <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> Time <input type="text"/> |
| 6 | S.47 Strategy Meeting completed & minutes recorded with actions of police & social services. If NO, document rationale for deviation from safeguarding strategy. Date <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> Time <input type="text"/> |

7 Name of Officer attending s.47 Strategy Meeting/Conference Call

8 Name of Social Work Manager and/or Allocated Social Worker involved in the S.47 Strategy Meeting

Contact number

9 Police Come to Notice Reference

10 Added to Child Exploitation Vulnerability Tracker

Yes No

Date

Time

11 Force Operational Risk Plan Opened

Date

Time

12 Force Risk Log Opened & Attached

Date

Time

13 Initial supervision completed within 24 hours & added to decisions page, inc. any details of multi-agency strategy outcomes.

Date

Time