Child Criminal Exploitation in County Lines in England and Wales: Challenges and Controversies of Dealing with a National Problem at the Local Level

The thesis is submitted in partial fulfilment of the requirements for the award of the degree of Professional Doctorate in Security Risk Management (DSyRM) of the University of Portsmouth

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Abstract

The county lines drug distribution model exploits children and young persons to supply and sell drugs exposing them to several harms to secure their participation including violence, sexual violence, extortion and coercion. This research establishes the challenges and controversies of dealing with the criminal exploitation of children and young persons in the county lines drugs model in England and Wales, a declared national problem at the local level. Conducted over three years, this exploratory study includes interviews with 40 participants drawn from academia, law enforcement and statutory and non-statutory organisations. It finds that despite growing awareness of county lines, the term child criminal exploitation is yet to receive equal recognition as child sexual exploitation. Despite claims made by the government and the National Crime Agency that child criminal exploitation represents a national issue, there is no national strategy meaning that the local identification of and responses to it are beset by definitional issues, siloed working practices, ineffective coordination of multiagency resources, poor information sharing, limited joint knowledge sharing and training and data collection incompatibilities. With lead responsibility for the response resting with the Home Office, child protection and welfare are overlooked in favour of treating the criminal exploiters of children as drug dealers or human traffickers. Neither has proven effective in reducing the criminal exploitation of children. Persevering with extant legislation not originally designed for this form of exploitation and which is currently buckling under the burden of cases means that children continue to be criminally exploited. This research views the problem through the theoretical framework of the policy context, legislation and operational practice. It makes recommendations for bespoke child criminal exploitation legislation that labels exploiters as child abusers and a national child criminal exploitation strategy with lead coordination responsibility sitting outside of the Home Office and law enforcement. The national strategy would promote child welfare and safeguarding over criminal justice responses. The responsibility for identifying and dealing with child criminal exploitation in county lines needs to be one that is shared with all the relevant organisations, parents/guardians and communities and, as essentially, must involve children and young persons in finding solutions.
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Declaration

Whilst registered as a candidate for the above degree, I have not been registered for any other research award. The results and conclusions embodied in this thesis are the work of the named candidate and have not been submitted for any other academic award.

[Signature]

Word count Chapters One to Eight inclusive: 49,993
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<td>ACE</td>
<td>Adverse Childhood Experience</td>
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<tr>
<td>ADR</td>
<td>Automatic Data Recovery</td>
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<tr>
<td>ALDCS</td>
<td>Association of London Directors of Children’s Services</td>
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<td>APCC</td>
<td>Association of Police and Crime Commissioners</td>
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<td>APP</td>
<td>Authorised Professional Practice</td>
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<td>APPG</td>
<td>All Party Parliamentary Groups</td>
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<td>BBC</td>
<td>British Broadcasting Corporation</td>
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<td>BTP</td>
<td>British Transport Police</td>
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<tr>
<td>CCE</td>
<td>Child Criminal Exploitation</td>
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<td>CCP</td>
<td>Child Centred Policing</td>
</tr>
<tr>
<td>CFOS</td>
<td>Children First, Offenders Second</td>
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<tr>
<td>Class A drugs</td>
<td>Includes heroin, cocaine, ecstasy and LSD</td>
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<td>CPS</td>
<td>Crown Prosecution Service</td>
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<td>CSE</td>
<td>Child Sexual Exploitation</td>
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<tr>
<td>DfE</td>
<td>Department for Education</td>
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<tr>
<td>DPP</td>
<td>Director of Public Prosecutions</td>
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<td>DS</td>
<td>Detective Sergeant</td>
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<td>GAIN</td>
<td>Government Agency Intelligence Network</td>
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<td>GDPR</td>
<td>General Data Protection Regulation</td>
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<td>HASC</td>
<td>Home Affairs Select Committee</td>
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<td>HM Government</td>
<td>His Majesty's Government</td>
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<td>HMICFRS</td>
<td>His Majesty’s Inspectorate of Constabulary and Fire &amp; Rescue Services</td>
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<tr>
<td>Acronym</td>
<td>Full Form</td>
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<tr>
<td>HMI Probation</td>
<td>His Majesty’s Inspectorate of Probation</td>
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<td>HO</td>
<td>Home Office</td>
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<td>MASH</td>
<td>Multi-Agency Safeguarding Hub</td>
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<td>MDA 1971</td>
<td>Misuse of Drugs Act 1971</td>
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<tr>
<td>MISPER</td>
<td>Missing Person</td>
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<td>MOPAC</td>
<td>Mayor’s Office for Policing and Crime</td>
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<td>Metropolitan Police Service</td>
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<tr>
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<td>National Crime Agency</td>
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<td>National County Lines Coordination Centre</td>
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<td>NPCC</td>
<td>National Police Chief’s Council</td>
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<td>NRM</td>
<td>National Referral Mechanism</td>
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<td>NSPCC</td>
<td>National Society for the Prevention of Cruelty to Children</td>
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<td>NVAP</td>
<td>National Vulnerability Action Plan</td>
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<td>NVC</td>
<td>Non-Verbal Communication</td>
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<td>OC</td>
<td>Organised Crime</td>
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<td>OCG</td>
<td>Organised Crime Group</td>
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<td>OIC</td>
<td>Organised Immigration Crime</td>
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<td>OTD</td>
<td>Out-of-town dealers</td>
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<td>PD</td>
<td>Professional Doctorate</td>
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<td>PNC</td>
<td>Police National Computer</td>
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<td>PND</td>
<td>Police National Database</td>
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<td>PWITS</td>
<td>Possession with intent to supply</td>
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ROCU  Regional Organised Crime Unit
RUSI  Royal United Services Institute
SCA  Single Competent Authority
SCR  Serious Case Review
SMS  Short Message Service
SOC  Serious and Organised Crime
SPACE  Stop and Prevent Adolescent Criminal Exploitation
TOEX  Tackling Organised Exploitation Programme
UNODC  United Nations Office for Drugs and Crime
USG  Urban Street Gangs
VCC  Vulnerability Coordination Centre
VRU  Violence Reduction Unit
YOI  Young Offender Institution
YOT  Youth Offending Team
Acknowledgements

My thanks and gratitude to Professor Ross Coomber and Professor Simon Harding for agreeing to participate as key informants. This research would not have been possible without the participation of all 40 respondents who willingly and enthusiastically shared their knowledge and experience of the subject matter. I thank them for their honesty and for the challenging job they perform in difficult circumstances. They are deserving of my support and gratitude. I hope they agree that the research findings will make a useful contribution to improving the knowledge and practice across all the relevant organisations and academics that are interested in combating the criminal exploitation of children in county lines.

A huge thank you to my supervisor Dr Leah Fox for always being available and for her advice, guidance, support, patience and understanding throughout this research. It has been my privilege to be one of her students.

A special thanks to my dear friend Dr Iris Saltiel for her counsel and words of encouragement and for her genuine interest in my research which has helped me through difficult times of self-doubt and kept me focussed on getting this thesis completed.

Thank you too to Dr Georgina Sinclair and Dr Liam O'Shea for their sage advice and for taking the time to listen to me.

Lastly, I suspect my family and friends have grown weary of me talking about this research. It has been a labour of love and a large part of my life for the last four years. I have found the passionate interest that called out to me as a researcher as suggested by Moustakas (1990). I cannot promise you this is the last you will hear me talk about it.
Publications and Commentaries

Journal Article


Book chapter


Translation


Other publications


Commentaries


Chapter One: Introduction

1.1 Foreword

This chapter introduces child criminal exploitation in county lines, details the researcher’s personal motivation for conducting the research, identifies the research question, its aims and the inclusion criteria and sets the research in context, highlighting the intended original contribution to knowledge and practice. Lastly, it sets out the structure and focus of the subsequent seven chapters of the thesis.

1.2 Introduction

“There can be no keener revelation of a society’s soul than the way in which it treats its children” (Nelson Mandela, 1995).

Childhood is about play, schooling, and freedom from responsibility (Honwana, 2005). It should be a stage in life where children feel safe, cared for and protected by adults not only within the family but within society. However, for an increasing number of children and young persons, their childhood reality is far from this ideal. The following story of Jake who was criminally exploited to work in the county lines drug distribution model paints a different and disturbing picture.

Jake was originally described as a caring and lively child but after exploiters recruited him into county lines to deal drugs on their behalf, he became dishonest, violent, and abusive and detached from both his family and school. His recruitment into county lines and subsequent exploitation had begun with him being paid money to take a package to a house in the local neighbourhood. It soon progressed to him being supplied with drugs and train tickets together with instructions to take them to a house 100 miles away with the promise of larger sums of money. Once there, Jake was imprisoned in the house where adults took drugs including heroin by injection. The drugs he was carrying were stolen from him leaving Jake with responsibility for the debt and forced to work for free under the constant threat of violence. He regularly went missing from his home, frequently lodging in appalling conditions across England. Jake was made to insert drugs into his rectum. He was repeatedly attacked.
and stabbed by other boys involved in county lines. Due to concerns about Jake’s safety and that of his siblings, his parents agreed for him to be taken into care from where he again frequently went missing. Jake and his family were continually threatened with extreme violence. Family members can also suffer. Jake’s mother lost her job and suffered depression, and the well-being and safety of other members of his family were also severely affected (Ofsted, 2018).

1.3 Personal Motivation for the Research

There are many stories like that of Jake, a victim of child criminal exploitation (CCE) in county lines, across England and Wales. For example, Jaden Moodie, was only 14 when he was rammed by a car to force him off the moped he was riding and stabbed to death in East London in January 2019. The subsequent Serious Case Review (SCR) found that he too was criminally exploited through county lines to sell drugs. It highlighted poor communication between his council’s social care services and the police stating that the statutory agencies missed opportunities to help him as they did not have sufficient information to understand the full extent of his vulnerability to criminal exploitation. The review also highlighted the lack of a national response when a victim of CCE is found in a location away from their home (Waltham Forest, 2020).

If stories like those of Jake and Jaden seem to be someone else’s reality, we should remind ourselves that all children are vulnerable to exploitation, sexual or criminal (Ofsted, 2018). As Jake’s case illustrates, criminal exploitation in county lines not only affects the person being exploited but their family too. Although ‘hardened’ through years in law enforcement and not easily shocked, it both sickens and saddens the researcher that there are people who care so little for the most vulnerable in society that they would exploit them and rob them of their childhood for their own selfish and greed-driven needs. Children have but one childhood: it cannot be re-lived. They have a right to expect that adults, family members, friends, peers and practitioners will protect them from harm. Those children following the same tragic path as Jake and Jaden, for whom “life hurts” (Harding, 2014, p.285 quoting a 15-year-old gang member) and for those who want to know when the “nightmare will end...have no idea how
to escape, and require help” (The Children’s Commissioner, 2019, p.4), compel and drive this researcher to conduct this study.

The researcher’s engagement with the subject began when he retired after 32 years in law enforcement. They had lived and worked overseas as a Drug Liaison Officer and Regional Manager for over half of their career tackling international drug supply, i.e., from the other end of the telescope to domestic drug supply. The county lines drug distribution model came to the fore just as he was retiring from the National Crime Agency (NCA). The researcher has also been a school governor for over a decade with responsibility for the school’s safeguarding practices. It is a responsibility taken seriously to ensure the welfare and care of the pupils is protected and that they are given every opportunity to lead a life where they can fulfil their potential.

Stories like those of Jake and Jaden are antithetical to the moral fibre of modern society. Researching CCE in county lines has allowed the researcher to combine his knowledge of tackling drug supply with his safeguarding experience in the hope of adding to the limited understanding of the subject and preventing more children and young persons from becoming victims of this abhorrent crime.

Returning to the opening quote at the beginning of this chapter from Nelson Mandela, the manner in which we identify and respond to criminally exploited children in county lines has placed the soul of our society on trial. We have a statutory obligation, but as importantly, a moral duty to protect children from criminal exploitation in county lines.

1.4 Introduction to the Research

The research aim is to answer the key question:-

*Child Criminal Exploitation (CCE) in county lines in England and Wales: What are the challenges and controversies of dealing with a national problem at the local level?*

The following four research objectives (ROs) underpin this aim:
RO1: To establish how child criminal exploitation is constructed and understood in county lines in England and Wales by the police and those agencies with whom the police engage when dealing with criminally exploited children.

RO2: To discover how this understanding influences and shapes how the police and those agencies respond to criminally exploited children.

RO3: To identify what challenges and controversies the current response represents to both the police and the agencies with whom they work.

RO4: Based on the findings from ROs1-3, what the implications for future policy and practice would be when identifying and dealing with child criminal exploitation in county lines.

The definitions and meaning of child criminal exploitation (CCE) and county lines are explored in the next chapter. The words ‘child and young person’ are applied consistently throughout this thesis. The term ‘child’ is used for younger children who due to their immaturity do not yet possess the understanding to make important decisions for themselves. The term ‘young person’ refers to more experienced and generally older children. What links both terms is that they refer to any person who is under 18 years old as stated in the United Nations Convention on the Rights of the Child (UN, 1989) and enshrined in domestic legislation under various Acts of Parliament, inter alia, the Protection of Children Act 1978 and the Children Act 1989.

The dominance of urban street gangs (USG) in county lines is evident from NCA reporting (2016, 2017) possibly because that is how the police identify the offenders but also through self-nomination on arrest, contributing to a dialogue of gang involvement (Storrod & Densley, 2016). But county lines groups may not be gang affiliated (Coomber & Moyle, 2018) and the term gang is a hotly disputed concept (Pitts, 2008). The thesis acknowledges that there is evidence of degrees of coordination by gangs, but research has also found that some out-of-town dealers (OTD) are unconnected to gangs (Windle et al., 2020). The term OTD describes those who are part of a larger, loosely structured network of friends and acquaintances ranked as equivalents as well as family members referred to as gangs, firms, or crews.
(Coomber & Moyle, 2018). It is the term used here as it encapsulates both gang and non-gang-affiliated perpetrators.

Disclaimer: Before continuing, please note that the focus of this research is to ascertain the challenges and controversies of the current identification of and response to CCE in county lines. It is therefore focused on these issues. It may help explain the tone of the thesis. It is not intended as a coruscating attack on the work conducted by any of the participants in this research, or their colleagues. Their hard work and efforts to confront CCE in county lines are hereby acknowledged.

1.5 Inclusion Criteria

The criminal exploitation of children can include criminal activities other than county lines drug supply such as theft and other acquisitive crimes, knife crimes and work on cannabis farms (Stone, 2013; Home Office, 2018, 2019a). This thesis is focused only on CCE in county lines as it represents the most contemporary form of criminal exploitation (HM Government, 2016; NCA, 2017, 2019a).

Vulnerable adults may also be criminally exploited in county lines but they are not included in this research because children, unlike adults, cannot consent to be exploited in this context.

The study is limited to England and Wales, chosen because this area is geographically coterminous with the legislation.

1.6 Situating the Research in Context

County lines is the neologism given to a drug distribution model using dedicated phone lines to advertise the presence of city dealers through Short Message Service (SMS) to new customers in the area and to take their orders for drugs (Coomber & Moyle, 2018). What is particularly concerning about county lines drug dealing is the deliberate and dynamic targeting of vulnerable people, like children and young persons, and the use of coercion, violence both physical and sexual, intimidation, and weapons as part of the exploitative business model (NCA, 2019b). County lines has emerged as a conspicuous and contemporary

There is still no legal definition of child criminal exploitation despite the Home Office (2018) acknowledging it is a key feature in county lines and that the number of criminally exploited children is rising (HM Government, 2016). This is surprising given the long-held knowledge of children trafficked from overseas and forced to work in cannabis farms long before the emergence of county lines (Ditcham, 2021a; The Children’s Society, n.d.). Human trafficking as a form of modern slavery, organised immigration crime (OIC) and child sexual exploitation (CSE) have been the focus of the extant literature on child exploitation (NCA, 2019a) and not CCE in county lines. Yet despite the focus on CSE, the results of the independent inquiry commissioned by Rotherham Council into a series of sex scandals concluded that gender, class, race and religion, victim blaming, contemptuous attitudes towards working-class victims and an absence of a child-centred focus, limited resources, training and a desire to protect the town’s reputation were contributing factors (Jay, 2014). More recently, a three-year enquiry into a similar CSE scandal in Telford found further evidence of victim blaming and nervousness around race, as well as information not being shared among relevant agencies (Crowther, 2022). It is disheartening to read especially considering Hudek (2018) and Ford (2018) encourage us to learn the lessons of past mistakes from CSE and apply them to CCE. It appears that in some quarters, those mistakes are still being made. That does not bode well for CCE in county lines, a relative newcomer but already described as being higher than sexual and labour exploitation (Dodd, 2020).

Thousands of children are putting themselves in danger (The Children’s Commissioner, 2019) with currently 4,000 teenagers believed to be criminally exploited in London alone (The Children’s Society, n.d.). Despite the estimate of tens of thousands of children and young persons dealing drugs across the UK, the clandestine nature of the business means such statistics have a large margin of error, meaning the true scale remains unknown but is likely to be larger than estimated (The Children’s Commissioner, 2019).

Child criminal exploitation in county lines is an area ripe for empirical research. It is an issue rarely out of the media, with those that run county lines posing a significant threat to
vulnerable people but an incomplete national picture hinders its understanding (NCA, 2017). The exploitation of children highlights an area where there is a pressing need for further research into how, as a society, we safeguard vulnerable populations, like children and young persons from criminals (Coomber & Moyle, 2018) because currently children are being let down through a combination of unsuitable safeguarding systems more aligned to interfamilial safeguarding; a failure by the agencies to work collaboratively to ‘scaffold’ effective measures around the child; fragmented governance and funding structures impacted by cuts to the police and youth services’ budgets and inadequate coordination of resources. These factors have all added to the scale of the problem, whilst allowing too many children to slip through the cracks and in some cases lose their lives (Home Affairs Select Committee[HASC], 2019). Six years after HM Government (2016) called for an urgent national response to exploitation in this context, one still does not exist. Therefore, this research asks and seeks answers to a highly relevant question, child criminal exploitation in county lines in England and Wales. what are the challenges and controversies of dealing with a national problem at the local level?

1.7 Original Contribution to Knowledge and Practice

Researching the challenges and controversies of dealing with CCE in county lines, a national problem at the local level is a novel approach that is both timely and relevant in light of HM Government’s drug strategy (2021). The publication sets ambitious targets for the treatment of addicts and sets the goal of closing over 2,000 county lines, increasing convictions for drug trafficking and increasing the number of vulnerable children and adults safeguarded.

Although there is a growing volume of reporting on county lines, the literature focused on the criminal exploitation of children is minimal, despite acknowledgement of the reliance on exploited vulnerable populations including children and young persons in the county lines drug distribution model (e.g., Coomber & Moyle, 2018). Given the estimates of the scale and the harm it causes to the victims and their families and friends as previously mentioned, CCE in county lines is an under-researched area and one where there is a pressing need for further investigation to add to the limited research base. This unique and timely research conducted with academics and practitioners working in the field asks a question not previously asked,
yet needs to be if we are to understand better the local, regional and national dynamics of this phenomenon. This is because with 43 police forces in England and Wales plus the British Transport Police (BTP) and 355 local authorities, responses have been described as both siloed and fragmented (HMICFRS, 2017). This has meant that the identification and understanding of the exploitation of vulnerable persons is very variable both across different locations and within organisations in the UK (Hudek, 2018; Turner et al., 2019). It is appropriate, therefore, that this research examines the issues that influence the identification and response to CCE in county lines and the extent to which locally driven activity as opposed to a collective national effort impacts outcomes in this area.

This research makes a well-timed and useful contribution to the limited research on CCE in county lines by bringing the voices of those working with children and young persons to a wider audience who will benefit from their knowledge and experience. Through primary research conducted with academics and practitioners, it identifies not only the challenges and controversies that currently exist but what is currently missing and what more could be done in this area. This original contribution to both practice and knowledge in this highly contemporary and important area will stimulate wider discussion with law enforcement, academia, government and relevant organisations. The thesis helps to influence practice and policy and bring renewed thought and drive to the ambition to reduce the criminal exploitation of children in county lines.

1.8 Mapping the Thesis

**Chapter Two: The Literature review: Part one: Identification and Recording.** In part one, the literature relevant to Research Objective One is covered to establish how child criminal exploitation in county lines in England and Wales is constructed and understood by the police and those agencies with whom they engage. The chapter explores CCE in county lines, issues of definition, assesses the scale and what makes this form of CCE a national problem, who is exploited, the recruitment methods used and the associated harms. The literature review strategy is in Appendix A.

**Chapter Three: The Literature review: Part two: The Response.** This chapter details the literature relevant to both Research Objectives Two and Three. Namely, it identifies how the
understanding from Research Objective One influences and shapes the response to criminally exploited children from the police and the agencies with whom they engage, as well as identifying the challenges and controversies the current response represents to those organisations. This is examined under the headings of the policy framework, the legislation and the operational. These titles form the theoretical framework through which this research was conducted. The chapter concludes by describing the knowledge gap to which this research contributes.

**Chapter Four: Methodology.** This chapter identifies the research problem, the research questions, and the research design detailing the methodology, how reflexivity is managed, the research method, the interview schedules, ethical considerations and approval, the sampling strategy, inclusion criteria, sample size, participants in the research, and the method of data analysis. It also highlights the limitations of the research.

**Chapter Five: Findings and Discussion-Part One.** Chapters Five to Seven inclusive cover the primary research findings from the interviews conducted with the research population and, where relevant, are cross-referred with the extant literature. This chapter relates to Research Objective One and exposes the challenges and controversies relevant to how child criminal exploitation in county lines in England and Wales is constructed and understood by the police and those agencies with whom they engage.

**Chapter Six: Findings and Discussion-Part Two.** The chapter covers the research findings from the interviews, triangulated with the literature relevant to both Research Objectives Two and Three. Namely, how this understanding influences and shapes the response to criminally exploited children from the police and the agencies with whom they engage, as well as identifying the challenges and controversies the current response represents to both the police and those agencies.

**Chapter Seven: Findings and Discussion-Part Three.** This chapter is linked to Research Objective Four. From the research findings of the two previous chapters (ROs 1-3) it covers the findings from this research outlining the implications for future policy and practice when identifying and dealing with child criminal exploitation in county lines. As such, when read in
conjunction with the recommendations made in Chapter Eight, both chapters frame the original contribution to practice from this research.

**Chapter Eight: Conclusion.** The chapter reviews the key findings from this research and makes recommendations for policy and practice using the headings of the theoretical framework adopted for this study as also set out in Chapter Three, namely the *policy framework*, *legislation* and *operational*. It highlights the original contribution to knowledge as well as suggests areas for further research.
Chapter Two: Literature Review: Part One: Identification and Recording of Child Criminal Exploitation in County Lines

2.1 Introduction

See Appendix A for details of the search strategy adopted for the literature review.

This literature review spans two chapters, encapsulating a thorough examination of the concepts and theories found in the academic and grey literature relevant to the identification of, understanding and response to child criminal exploitation in county lines in England and Wales. This chapter reviews the literature relevant to Research Objective One: how child criminal exploitation in county lines in England and Wales is constructed and understood by the police and those agencies with whom they engage.

The literature review findings in this chapter are listed under the main themes of The Conceptualisation and Understanding of CCE in County Lines, a National Problem? Assessing the Scale, Who is Exploited and How are they Recruited?, the Methods Used and Associated Harms before concluding with a link to the second literature review chapter on the response to CCE in county lines.

2.2 The Conceptualisation and Understanding of CCE in County Lines

2.2.1 Child Criminal Exploitation (CCE) in County Lines

HM Government (2018a, p.48) defines county lines as -

[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.

The idiom county lines comes from the mobile phone line used to connect customers to city dealers in their locale and to take orders for drugs (NCA, n.d.). They use aggressive methods through SMS to advertise their presence (Coomber & Moyle, 2018). Originally, the term also described the movement of dealers across county boundaries or from urban to rural locations to sell their drugs to new markets (Pitts, 2008; Ruggiero, 2010; Hallsworth, 2013; Harding,
2014; Windle & Briggs, 2015b; Hallworth, 2016; Coomber & Moyle, 2018) but there has been a shift to also dealing locally perhaps caused by the restrictions imposed on movement from the Covid pandemic and issues of availability of the drug and accessibility of markets (Pitts, 2020).

Despite growing awareness, the partiality of government publications (Windle & Silke, 2019) together with a lacuna of empirical research means there is an incomplete understanding of CCE in county lines (Janesh & South, 2018). Previously, there was very little evidence that dealers targeted children to access emerging markets (Coomber, 2006). However, CCE has a strong association with county lines because criminals use children and young persons to transport and sell drugs on their behalf thus reducing the personal risk to those criminals (Coliandris, 2015; HM Government, 2018a). Therefore, children become an exploitable commodity that enables dealers to remain anonymous whilst supplying their local areas without the need to go ‘hands-on’ themselves (NCA, 2015). Coercion, trafficking, gun and knife crime as well as child sexual exploitation are visible in county lines exploitation (Black, 2020). Children and young persons constitute between one-quarter (NCA, 2019b) and one-fifth (National County Lines Coordination Centre [NCLCC], 2021) of exploited persons and are used because they are unlikely to have criminal convictions or be known to the police so can stay under their radar (Andell & Pitts, 2018; NCA, n.d.). They are a disposable and inexpensive workforce able to cope with the risks linked to street-level drug operations (Coomber & Moyle, 2018).

Whether county lines symbolises a new phenomenon or where existing markets have mutated is debatable as ‘going country,’ as it is colloquially known, has been a side-line for gangs involved in drug dealing from the early 21st century (Pitts, 2008; Hales & Hobbs, 2010; Andell & Pitts, 2013). Two of its attractions are that few local dealers resist (Shapiro & Daly, 2017) and there are gaps in the market created by successful police operations (Andell & Pitts, 2018). It has also been suggested that whereas the police are likely to know the local dealers, they become less visible in new county locations (Shapiro & Daly, 2017). However, the oversaturation of drug markets and the use of adolescent children to deliver drugs, sometimes intimidating them to secure their compliance through joining gangs to further
drug dealing activity existed before the emergence of the neologism, *county lines* (Hales & Hobbs, 2010; Windle & Briggs, 2015a; Firmin, 2018; Pepin, 2018; Harding, 2020).

CCE is a relatively new acronym, but it describes something in existence for centuries (Turner *et al.*, 2019). Like county lines, child criminal exploitation is not legally defined. However, the Home Office (2018, p.2) acknowledges the link between CCE and county lines stating:-

*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.*

CCE is apparent in other contexts, such as being trafficked to work in cannabis farms, begging, labour exploitation, sexual exploitation and organised immigration crime (Barlow, 2019; NCA, 2019a). Whilst these fall outside the scope of this research they have in common some similar methods of recruitment/grooming often commencing with befriending someone but ultimately turning to forced coercion whereby a child or young person is beholden through a ‘debt’ that needs to be worked off. Recruitment to county lines is described in section 2.4 whilst how exploited children view themselves in this context is covered in section 2.4.1.

Described by Coliandris (2015) as a ‘wicked problem’ county lines represents a relatively new phenomenon. It is a departure for British drug markets away from a hub and spoke model (Windle & Briggs, 2015b) where drugs are transported to regional hubs by local wholesalers with local low-level sellers supplying local markets (Matrix Knowledge Group, 2007; Hales & Hobbs, 2010). Drug markets in the UK are constantly evolving and changing and are by no means a homogenous concept (Coomber 2015; Andell & Pitts, 2017; Hay *et al.*, 2019). County lines, as the latest incarnation of these structural changes, represents an ingenious modification of the drug supply model (Coomber & Moyle, 2018) that involves people travelling from hub cities often at some distance from their home area to new areas to deliver drugs in wholesale quantities. They then retail them using young dealers from urban hubs working with local vulnerable persons from new areas (Windle & Briggs, 2015a; Windle *et al.*, 2020).
The understanding of county lines has emerged slowly. One reason given is that drug markets are not standardised and hence, structural changes are not always readily visible (Harding, 2020). Apart from the NCA assessments and press reporting on county lines, very little is known about the subject (Maxwell et al., 2019; Robinson et al., 2019). The current literature base on the involvement of children and young persons in county lines is described as both “...limited and partial” (Windle et al., 2020, p. 74).

Another reason could be because originally, county lines research was only geospatially focussed on London and the South of England (e.g., Windle & Briggs, 2015a & b; Andell & Pitts, 2018; Coomber & Moyle, 2018). Robinson et al. (2019) conducted research in Glasgow and Merseyside breaking that mould. Merseyside is the second largest exporting hub for county lines after London (NCLCC, 2021), so their research was both timely and original. One aetiological explanation for the move to retail operations in rural locations, often far from native urban hubs was that the existing city markets had become awash with drugs (Ruggiero, 2010; Windle & Briggs, 2015a and b; Andell & Pitts, 2018; Spicer, 2019a; Robinson et al., 2019).

Coomber and Moyle (2018) described a developing drug supply model involving major supply hubs selling crack cocaine and heroin to satellite areas through commuting, holidaying or temporarily taking over premises in a process called ‘Cuckooing’ after how cuckoo birds invade and take over the nests of other birds (Spicer et al., 2019; Harding, 2020). However, academic research into the spread of travelling retail dealers remains incomplete (Coomber & Moyle, 2018). Whilst some academics reject the saturation argument to explain the emergence of county lines, what is clear is the methods of drug supply, and their markets have altered greatly in recent years impacting significantly on host towns as well as those involved, either as victims or offenders (Harding, 2020). This incomplete understanding of the phenomenon and divergence of opinion impacts how child criminal exploitation is constructed and understood by the police and agencies with whom they engage (RO1).

### 2.2.2 Definition Issues

It is clear that since 2015, there has been more focus on county lines from criminology, drug misuse and public health perspectives (Harding, 2020) leading to greater awareness of the
model and associated harms (Moyle, 2019). Despite this increased focus, barriers to forming a universal understanding of the phenomenon remain. For example, the absence of an agreed definition of CCE among academics and practitioners and the lack of strategic guidance leads to difficulty in identifying victims (Barlow, 2019). This could be because the language used in the definitions of CCE and county lines does not mirror that used by children when they talk about their experiences. Additionally, the type of criminality which involves exploited children is far wider than the extant loosely-worded definitions convey (Howard League for Penal Reform, 2020). To illustrate this point, an exploited child provided a more succinct definition of CCE than the Home Office (2018) version as happening “When someone you trusted makes you commit crimes for their benefit” (Child D aged 12, Turner et al., 2019, p.4). Other definitions have linked criminal exploitation to child abuse (e.g., NSPCC, 2020), a term usually connected to CSE.

CCE like county lines is a neologism but whilst the latter has found its way into the lexicon of academics and practitioners, few use the term CCE when referring to criminally exploited children through county lines or other means. CCE is, therefore, an emerging term waiting to be recognised and adopted as standard (Harding, 2020). The NCA (2019a, 2020, 2021) does not use the term in the title of any publications including the National Strategic Assessment of Serious and Organised Crime (SOC), a highly relevant publicly available publication highlighting key SOC threats. In their intelligence assessment on county lines (2019b), they only make one reference to criminal exploitation as being the most common type of exploitation in county lines where both male and female “minors” are recruited as drug couriers but the term CCE is not used. HM Government’s (2021) drug strategy sets targets for the removal of county lines, but it makes no mention of the criminal exploitation of children or the term CCE in any context despite children and young persons constituting 20 per cent of exploited victims (NCLCC, 2021).

This helps explain why knowledge of CCE is described as ‘uneven’ (Setter, 2019) and why identifying CCE in county lines and the children involved are some of the key challenges statutory sector organisations face (Hudek, 2018). A reason could be that both researchers and practitioners look for and analyse data that is most relevant to their individual interests, requirements and objectives (Barlow, 2019). They, therefore, seek a parochial rather than a
holistic, national understanding of the issue(s). This may explain why whilst London has the greatest awareness of child criminal exploitation in county lines it still experiences difficulties in both identifying CCE and in the response (Hudek, 2018).

A report written for The Children’s Society (Turner et al., 2019) condemns the absence of a national legally binding definition of CCE and says child criminal exploitation should be a policy priority. The Children’s Commissioner (2019) too wants recognition of CCE as a national priority. HMICFRS (2020) echo this call and urges the Home Office to enshrine the lengthy definition, or an amended version in a statute by the end of 2020: this has not happened (as of September 2022) meaning that without a nationally agreed definition in legislation, a key finding of the literature review is that there can be no universal construction or understanding of CCE in county lines among academics and practitioners (RO1).

Having examined issues around the definitions of CCE in county lines, this next section reviews the scale to assess what makes it a national problem.

### 2.3 A National Problem? Assessing the Scale

The lack of a national and legally binding definition means the true scale remains hidden (Turner et al., 2019) but it is reported that criminal exploitation has overtaken labour and sexual exploitation (NCA, 2020).

Crack cocaine and heroin are the drugs most supplied due to their size and ease of transport compared with cannabis, for example (Spicer, 2019a; Black, 2020). Other substances are also supplied like powder cocaine and cannabis alongside skunk, amphetamines, spice, ecstasy, methadone, diazepam, Xanax and Mcat when OTD cannot get crack or heroin due to law enforcement activity but this may also point to some lines branching out (NCLCC, 2021) or a side-line activity (NCA, 2019b). Recent reporting suggests that seven per cent of lines supply crack cocaine whilst heroin has seen a ten per cent drop between the two reporting years 2018/19 to 2019/2020 (NCLCC, 2021) indicating heroin is not attracting younger users in the same way as crack (Black, 2020; NCLCC 2021). In contrast, cocaine consumption in Great Britain is estimated to be 117 tonnes (NCA, 2021) with the market in England, Scotland and
Wales worth between £9.4 and £11.8 billion per annum equating to £25.7 million daily (NCA, 2020).

County lines is described as a national threat (HM Government 2016: NCA, 2017) with successive intelligence assessments issued by the NCA (2015, 2016, 2017, 2019b) indicating a growing problem experienced from just seven police forces in 2015, to 31 a year later, 38 in 2017 and all Forces by 2018 making the exponential growth in county lines an epidemic of modern times (Pitts, 2020).

This is matched by increasing awareness amongst police forces in England and Wales of this existential threat (Ford, 2018). All policing areas have or are experiencing this form of drug distribution, but London, West Midlands, and Merseyside are identified as key ‘exporting’ hubs, distributing drugs across the landscape as the map (Figure 2.1) indicates (NCLCC, 2021).

The exact number of children affected by county lines remains unknown due to the lack of data collection (Maxwell et al., 2019). It is reported that tens of thousands of children and young persons have become embroiled in street-level drug supply as a result of factors such
as drug prohibition, capitalism, inequality, and the use of social media (Irwin-Rogers, 2019), meaning that county lines has emerged as a national, rather than a local problem. There are thought to be 27,000 children in England alone who are gang members (The Children’s Commissioner, 2019), however, as previously stated county lines includes both gang and non-gang activity. The involvement of a growing number of children and young people in supplying drugs is illustrated through increases in the proportion of children under the age of 20 years that have been convicted of drug supply. There has also been a 40 per cent increase in drug use among children aged 11 to 15 since 2014 for both boys and girls across most demographics (Black, 2020). Between January 2018 and April 2019, the Mayor’s Office for Policing and Crime (MOPAC) identified over 4,000 young persons involved in county lines emanating from London: those aged 15 to 19 make up nearly half (Busby, 2019).

The clandestine nature of the business means that estimates of thousands of children and young persons dealing drugs across the UK have a large margin of error (The Children’s Commissioner, 2019). But whilst estimates of using children in the county lines drug distribution model may suffer from media hype (Windle, 2019), deviance has to be present for it to be amplified (Young, 2009). Hence, this thesis accepts the premise that CCE in county lines represents a significant national problem despite the issues associated with its definition and assessment of the scale.

2.4 Who is Exploited and How are they Recruited?

Harding (2020) says CCE in county lines often commences with recruitment to the line. However, the exploitative process begins earlier. The Children’s Society (2018) identified four stages in criminal exploitation recruitment. It begins with the targeting stage where a potential child victim’s vulnerabilities are identified and their trust is gained: the experience stage where the criminal lifestyle becomes normalised; the hooked stage where the child or young person feels they a member of a gang or group, and lastly, the trapped stage where the victim now believes they are dependent on the group. It is here that they discover the true identity and character of their exploiter.

The following flowchart (Figure 2.2) depicts how, after the identification of a market, the OTD identify vulnerable persons, groom and recruit them.
The police and relevant practitioners link county lines with the use of young boys transporting drugs from the cities to rural areas (Coomber & Moyle, 2018; Robinson et al., 2019). The practice requires regular recruitment of young people into the line for business continuity (Harding, 2020). Whilst rare, there is a record of using children and young persons in drug markets but what makes county lines different is the coercive control used as more systematic and widespread exploitation than previous sporadic exploitation through familial or friendship networks (Windle et al., 2020).

Since the early lacuna of information, the widespread use of children is one reason why county lines has received such high levels of attention (Spicer, 2019b). Children undertake a variety of roles in the model including cutting and bagging drugs and collecting debts in addition to cuckooing premises (NCA, 2019b). 15.8 years is the average age in a ‘workforce’ role. A small number operate as line holders but at 16 to 17 years old they are slightly older. Children between 15 and 17 years make up the majority of the identified victims of CCE in county lines (Barlow, 2019), but both younger and older persons are also at risk (NCA, 2019b).

For example, children from aged twelve (Windle & Briggs, 2015b) or even six (The Children’s
Society, n.d.). The latter is an outlier in the data and not repeated elsewhere, but the involvement of children under the criminal age of responsibility is unlikely to be on the radar of law enforcement agencies. It is a very concerning statistic if replicated elsewhere and represents a knowledge gap.

A key feature of CCE is that both males and females can be recruited through grooming, in person or online (NSPCC, n.d.). 91 per cent of those recorded as county lines offenders are male. However, females represent an underrepresented cohort because gender bias means discovering females carrying drugs and weapons is less likely (NCA, 2019b). It is known that male offenders target vulnerable females to create a false romantic relationship through affection and providing gifts before exploiting the victim in county lines activity or, through drink or drugs, made compliant (Harding, 2020). Some females recruited in this way are then subject to sexual exploitation and may not realise that they are being exploited, (NCA, 2019b).

Criminal exploitation of children is antithetical to societal morals but despite several publications warning both criminal justice and children’s services of the risks to children and young persons (e.g., Home Office, 2018; Children’s Society, 2019a & b), rising numbers of children in care and school-excluded children since 2014 continue to provide a ready-made pool of possible victims (Department for Education, 2021; Ministry of Housing, Communities & Local Government, 2018). Moreover, as the economic situation caused by the pandemic causes the formal economy to contract and the informal to expand, the attractiveness to children is unlikely to diminish (Harding, 2020). For many children and young persons working county lines is easy and highly lucrative (Robinson et al., 2019) and fast money compared to poorly paid menial work and the shame of poverty (Irwin-Rogers, 2019). Some children are therefore prepared to engage in risky hypermasculine activity that brings status, which Harding (2014) termed ‘street capital.’ There is no shortage in the supply of children and young persons but most will see very little reward for their involvement (Robinson et al., 2019). In research conducted by Spicer (2019a), police participants relayed how children and young persons they had arrested had become involved through grooming or were entrapped into working county lines for little financial reward. However, despite variable levels of exploitation, for some, drug running is a means of earning money that is less unsavoury and more convenient than sex work or stealing (Coomber & Moyle, 2018). With little financial
reward, it is perhaps difficult to imagine why a child or young person would want to engage in county lines, but for those exposed to drug markets as part of their experience whilst growing up, it is nothing out of the ordinary (Morgan et al., 2020). It is also a truism that younger members care more about their image and reputation than profit (Andell & Pitts, 2017). Becoming a ‘gangsta’ is not just about the reward but status and acknowledgement as being a ‘somebody’ (Young, 1999). That need for recognition, to earn ‘street capital’ to survive in the ‘street casino’, is a dangerous place for a young person (Harding, 2014, 2020) but it is a form of ‘protection agency’ essential for survival on the street (Atkinson-Sheppard, 2017). For these children, life experienced in the ‘road culture’ outside of the home environment is a “seductive yet humdrum and functional role” (Gunter, 2010, p.93) providing income and excitement.

### 2.4.1 Vulnerable Children and Young Persons

Although vulnerable adults are also targeted by the exploiters, children are especially vulnerable to victimisation as they can be easily impressed by false promises of wealth, stature and where this is missing from their lives, a sense of belonging (Coomber & Moyle, 2018; Stone, 2018, Turner et al., 2019).

Young people are often defined as vulnerable due to two factors: one is their age and the other is that they are deemed incapable of protecting themselves (Macklin, 2012). If it is accepted that all children should be deemed vulnerable because of their age then adding the word *vulnerable* before children in this context is redundant. However, some factors may make a child more vulnerable than others and these are examined at 2.4.2.

Vulnerability is a much-contested term, with many meanings. Its importance is in how society classifies people and defines its social obligations to allocate resources and justify interventions (Brown, 2011). The word *vulnerability* in the literature related to youth crime is prevalent, but its meaning is unclear and alters from one study to the next (Bui & Deakin, 2021). The word also has many different nuances across organisations within government (Howes et al., 2017).
There is no one universal definition of vulnerability but any definition relevant to CCE in county lines should encapsulate the situational and circumstantial factors involved in where someone is incapable of taking care of or protecting themselves or others from exploitation or harm as identified in the College of Policing definition of vulnerability (n.d.). The absence of a standard definition of a vulnerable person has led to a flaw in the conceptualisation of vulnerability within policing and negatively affects the responses delivered by the police and agencies with whom they work (Coliandris, 2015).

It is a debated concept the extent to which children and young persons view themselves as vulnerable but it is relevant to how the responding agencies deal with CCE in county lines. Robinson et al., (2019) dispute the conceptualisation of an exploited person as a helpless victim forced against their will into criminality by a ruthless gang member. Their study conducted in Glasgow and Merseyside identified that some children acknowledged they were being ‘used’ but had acted of their own volition for standing among their peers and financial reward. They argued that this blurs the distinction between offender and victim thereby challenging more commonly held perceptions of children as vulnerable victims. Windle et al., (2020) too encountered toughened, streetwise children not defenceless victims. Spicer et al., (2019), Irwin-Rogers (2019) and Moyle (2019) have all lent their voices to similar findings. Anne Longfield, when she was the Children’s Commissioner (2019) did not share this view and said it shocked her how noticeably fragile many of the children and young persons were. Certainly, the outward-facing tough exterior of some vulnerable persons makes it a lot harder for practitioners to identify a person as vulnerable. But, regardless of how they present and whilst acknowledging that some children or young persons enter this world of exploitation unaware of the risks they face, they are in fact victims of coercion and/or desperation and their involvement should not be interpreted as exercising free choice (Knowsley Safeguarding Children Board, 2017).

Criminally exploited children and young persons can often be both victims as well as agents of harm to others (Coliandris, 2015; Moyle, 2019; McClean et al., 2020) and this is a difficult concept to comprehend, either for some practitioners or for certain organisational cultures (Hudek, 2018). It does, however, mean that there is no stereotypical victim and that if
practitioners only recognise as victims those that are readily identifiable as such, the construction and understanding of CCE in county lines will be flawed (RO1).

Whatever the vulnerabilities of people mean, the term signals the need for special care, or the moral and ethical duty for action (Brown, 2011). Certainly, all criminally exploited children are vulnerable but given the issues raised previously, it is perhaps little surprise that identifying and understanding the exploitation of the vulnerable continues to be very variable across different locations and within organisations in the UK (HMICFRS, 2018; Hudek, 2018, Ford, 2018).

2.4.2 Those at a Higher Risk of Recruitment

A recently released study of 13 male victims of CCE in county lines identified that all had problems with substance abuse and all but one had previous offending behaviour. Many had episodes of going missing, and growing up in households where domestic abuse was prevalent featured predominantly among the cohort (Calouri et al., 2022).

A lack of a stable environment, living in poverty or with discrimination, connections with others in gangs, being in care, excluded from school or under-performing at school possibly through learning difficulties or attendance at a Pupil Referral Unit (PRU), are some factors that can make children and young persons easy prey for others to exploit (Home office, 2018; NCA, 2019; Turner et al., 2019; Harding, 2020). Often, exclusion from school is the ‘tipping point’ which places young people at high risk of exploitation by criminal gangs (All Party Parliamentary Groups [APPG], 2019).

The use of missing persons (MISPERS) is common in county lines (NCA, 2016, 2017). The examples of children and young people with frequent and extended missing episodes linked to county lines come mainly from London and the South-East, reflecting the main focus of early research (e.g., Coomber & Moyle, 2018). The Covid pandemic meant a reduction in reported MISPERS but those reported were missing for longer possibly as a result of the risk of using public transport pushed them to use private vehicles instead (Brewster et al., 2020).

Targeted in person or via social media, the recruitment of children and young persons is often referred to as grooming and could represent the next grooming scandal after Rochdale
Social media is used to recruit others through the promotion of drug selling activity as an attractive lifestyle (Storrod & Densley, 2017). Children do not need direct contact on YouTube, Snapchat or Instagram to be recruited (Kelly, 2019). It can take as little as 80 minutes (Campbell, 2021) using photos of material wealth to attract those, especially children, prepared to enter this ‘forbidden’ world despite any moral reservations they might have (Spicer, 2019b).

Whilst the factors above may make someone more vulnerable to exploitation, more recent research has shown that children from stable backgrounds can also be targeted, especially whereby exploiters take advantage of difficult parental relationships and/or peer group problems. The reality is, therefore, that any child is vulnerable to exploitation (NCA, 2019b; Maxwell et al., 2019; Turner et al., 2019).

### 2.5 Methods Used

The NCA (2017) recognises its limited understanding of CCE in county lines, but identifies the following methods used to recruit children.

Of all methods used, debt bondage corresponds most closely with exploitation (NCA, 2017). Children acting as drug runners are given drugs to transport and/or sell and these are then stolen from them in fake robberies by those for whom they work together with any money they hold, thereby creating a debt that the child must work to repay (Windle & Briggs, 2015b; NCA 2017, 2018).

Violence or the threat of it are used as an instrument of control (Harding, 2020). Young people are often required to carry out the ‘dirty work’ of elders or ‘prove’ themselves to other members of the gang or organisation. The increase in stabbings and carrying of weapons by young people involved in drug supply illustrates this point (Black, 2020). Serious violence has increased since 2014, but unfortunately, the data is not robust enough to identify the link between this rise and county lines (NCA, 2019b). However, of most concern to police forces dealing with county lines is the increase in serious violence (Spicer, 2019a) as the evidence shows where county lines dealers take over from local dealers in an area, levels of serious violence increase (Hallworth, 2016).
Reporting restrictions make it difficult for the NCLCC to establish the true level of violence used in controlling a county lines supply model. However, data does show the use of violence and serious injury including loss of life is on a continuing trajectory (NCA, 2019b). Whilst some research painted a picture that promoted the ‘pusher myths’ (Coomber, 2006) of county lines groups with ‘evil’ individuals routinely engaging in sadistic violent acts, Spicer (2019a) found, in a closer examination of some incidents, a more nuanced landscape. He identified dealers employing violence for demonstration purposes to further their drug dealing business to deter competition but as a short-term tactic to dominate with ongoing violence only used to enforce drug debts. Possibly, because those who control lines are no different from other drug dealers who recognise attracting police attention is bad for business (Pearson & Hobbs, 2001). Although some academics argue violence in county lines is overstated (e.g., Coomber, 2015), the study by Harding (2020, p.260) found it to be instrumental to exercise control and is “prolific, endemic, normalised and mostly under-reported” perhaps indicating how those involved resort to using more violent tactics to keep their line in order. Whatever the true scale and nature of the violence used or threatened to be used is, it is evident that using violence and force is more complex than described in policy papers and intelligence assessments (Moyle, 2019).

2.6 Associated Harms-Adverse Childhood Experiences (ACEs)

The longer-term harms to children from county lines are unknown (NCLCC, 2021) but are likely to be associated with suffering adverse childhood experiences (ACEs) and the potential for lifelong physical and mental health issues. ACEs are described as highly stressful and potentially traumatic situations or events that occur during childhood or adolescence. They can result from a single traumatic event or over time with prolonged threats. Studies in the UK have established that approximately half the population experienced at least one ACE (Bellis et al., 2014; Allen & Donkin, 2015). ACEs have been described as having an impact on a person’s future mental and physical health with the longer they experience an ACE and the more they experience, the bigger the impact on their health and development. In the context of this research, county lines exploitation is linked to a child either being victim to or exposed to physical and emotional violence, CSE, going missing, domestic abuse, modern slavery and
human trafficking. Family members and friends can also be exposed to these risks (The Children’s Society et al., 2018; NCLCC, 2021), but they can also be perpetrators of CCE too. This can be either in a primary role, exploiting their children to commit crimes, or in a secondary role by overlooking the criminality due to the rewards they receive (Densley, 2013). Some adults involved in county lines have offered their children to ‘controlling offenders’ for sexual activity (NCA, 2019b).

Exposure to the local heroin and crack cocaine market, being a victim of robbery, and the violence are all experiences present in the county lines drug supply model (Windle & Briggs, 2015a). Not least being around the drug milieu, where children are forced to sell drugs and often meet vulnerable adults (The Children’s Society et al., 2018) may heighten the risk of suffering trauma, including a variety of ACEs (Windle et al., 2020). There is also the risk of criminalisation and imposition of long prison sentences associated with Class A drug supply (Spicer, 2019a).

Other harms include family strain from prolonged absences of runaway children (Evans et al., 2007), whilst the impact of no support networks is a traumatic experience for children (Catch 22, n.d.). County lines, CCE, CSE and children missing from home are often talked about as separate issues, but they are symptoms, not causes, and are all inextricably linked (Catch 22, 2021). Repeatedly missing from home impacts education, making children more vulnerable as they become excluded from mainstream support and may damage their chances of a smooth passage into adulthood (Sturrock & Holmes, 2015).

Risks to females include being used to perform sexual acts with the threat of physical or sexual violence for non-compliance or exposure via social media channels of degrading or compromising sexualised photographs or detrimental comments (Storrod & Densley, 2017; Robinson et al., 2019; Glover Williams & Finlay, 2019). Children can be forced to insert and carry drugs into their intimate cavities, or store wrapped drugs in their mouths, ready to swallow should they encounter the police (The Children’s Society et al., 2018).

In summary, whilst the true impact remains unknown, many children involved in county lines where the ‘spectrum of harm’ includes physical violence, emotional abuse and intimidation (Moyle, 2019), will have already experienced several ACEs (Coomber & Moyle, 2012; Sturrock
& Holmes, 2015; Windle & Briggs, 2015b; Robinson et al., 2019). Their continued involvement is only likely to amplify the harm already caused (Windle et al., 2020), with potential breakdowns in familial relationships, disengagement from education and declines in mental well-being (Irwin-Rogers & Harding, 2018). Equally alarming as the list of harms exploited children may experience is the fact that the subject is yet to receive sufficient policy, media or academic attention (Windle & Briggs, 2015b). The conceptualisation of CCE lags behind CSE where what was originally termed child prostitution and suggestions of complicity are now replaced with acknowledgement of the child’s victimisation (The Children’s Society, 2015). Lamentably, a similar understanding of the victimisation in CCE has some way to go to be on a par with CSE (Baidawi et al., 2020). It represents a gap in our knowledge and the absence of this knowledge impacts on how CCE in county lines is constructed and understood (RO1).

### 2.7 Chapter Summary

This chapter reviewed the literature relevant to Research Objective One: how child criminal exploitation in county lines in England and Wales is constructed and understood by the police and those agencies with whom they engage. It identified a growing awareness of the phenomenon but that there are still many gaps in our collective knowledge, possibly linked to the limited geographic focus of the early research as well as the focus of the literature on county lines in preference to CCE.

The chapter also revealed that no standard definition of CCE in county lines exists in practice or in law despite calls for this to happen from HMICFRS (2020). The criminal exploitation of children in county lines is a growing concern to the government, academics, and practitioners and despite some evidence of progress made since its emergence in the academic literature circa 2015, the collective construction and understanding of CCE in county lines remains weak. This has implications for how the police and those with whom they work respond if they cannot collectively construct and understand what it is they are meant to respond to.

The next chapter examines the response to CCE in county lines through the theoretical framework adopted for this research examining the policy, legislative and operational perspectives before summarising the gap in the literature this research aims to fill.
Chapter Three: Literature Review-The Response To Child Criminal Exploitation in County Lines

3.1 Introduction

The previous chapter reviewed the literature relating to Research Objective One and the construction and understanding of CCE in county lines. It identified there is no agreed definition and that knowledge of many of the associated concepts remains weak. This chapter considers the extent to which this unclear picture of the phenomenon then impacts the response. In particular, the research focuses on Research Objectives Two and Three:

RO2: To discover how this understanding influences and shapes how the police and those agencies respond to criminally exploited children.

RO3: To identify what challenges and controversies the current response represents to both the police, and the agencies with whom they work.

The research question is Child criminal exploitation in county lines in England and Wales: What are the challenges and controversies of dealing with a national problem at the local level? ‘Dealing with’ is synonymous with the word response, hence the title of this chapter. Engagement with the literature identified that the response to CCE and to county lines could be categorised under three broad concepts: the policy framework, the legislation, and the operational. This conceptualisation of the phenomenon is the theoretical framework through which this research was conducted and it frames the headings for the following three sections beginning with the policy framework.

3.2 The Policy Framework

Over recent years, the county lines drug distribution model has received increasing political attention with several government reports putting the phenomenon on the map and highlighting concerns that it is both a social and criminal justice issue. The APPG report on the Missing, Gangs and Exploitation Roundtable (2017) labelled county lines as a national issue.
However, despite identifying the imperative for a national response that safeguards the vulnerable (e.g., HM Government, 2016; 2018a) there is limited focus on CCE when compared to other forms of exploitation such as CSE despite acknowledgements that there are lessons to learn from this response (Ford, 2018; Hudek, 2018). County lines is a form of CCE (Home Office, 2019a) but there is no strategy for recognising and dealing with criminally exploited children in this context. When viewed in context with the problems of identifying CCE mentioned in the previous chapter, the issue has been overlooked for too long.

Where CCE receives some attention within national policy, it is in the context of other strategies, such as the Ending Gang Violence and Exploitation (2016) strategy and The Serious Violence Strategy (2018). Both of these documents link the subject to gangs whereas CCE in county lines, as previously stated, does not only involve gangs. As such these documents form an incorrect and outdated view of the subject in need of updating. What they also have in common is that they place the responsibility firmly on outcomes through the criminal justice system and law enforcement agencies (Barlow, 2019). Whilst the Department for Education (DfE) took the lead for directing local authorities’ activities in identifying and responding to CSE, somewhat perversely the Home Office took lead responsibility for CCE meaning that the response has almost exclusively been enforcement led (Calouri et al., 2022). There has therefore, been no guidance from DfE in relation to CCE. Their (2021a) guidance on keeping children safe in education states that no one individual practitioner can possibly possess the full knowledge of a child’s circumstances and therefore needs. It places the onus on all those who come into contact with a child potentially in need of support to perform their role in identifying concerns, sharing information and to respond promptly. The guidance recognises that often children caught up in criminal exploitation commit crimes themselves and that professionals do not always identify they are vulnerable victims too, and therefore, the response is inappropriate.

More widely within government, politicians have sought to transfer blame for county lines on those involved rather than acknowledging the impact of austerity policies, marginality and increased deprivation in coastal areas (Spicer, 2021). Tackling the harms associated with drug markets through emphasising law enforcement responses whilst ignoring the appeal of quick cash and material rewards is a myopic and unsophisticated response (Irwin-Rogers, 2019). A
review of serious youth violence conducted by the HASC (2019) whilst acknowledging the extensive links with county lines concluded the strategy was inadequate as an answer to the violence affecting communities. The challenges and controversies identified by the review included the lack of discernible targets or milestones, few new actions and no clear mechanism to drive activity at both the national and regional levels.

Despite several publications warning child welfare and criminal justice authorities about the risks CCE poses to children and young persons (Stone, 2018) there are only two HM Government documents that directly refer to CCE. The first is a brief Home Office (2018) county lines guidance document of fewer than 10 pages with a flow chart of what to do if concerned about a child, discussed later in this chapter (see Figure 3.1). One year later, the Home Office (2019) added a ‘disruption toolkit’ for frontline staff engaged in safeguarding children. It identifies the links between various forms of exploitation, including CSE and CCE and warns against prioritising criminal justice responses although it does encourage the use of injunctions and Orders as an essential element of safeguarding.

Unlike CSE, CCE forms no part of HM Government’s *Serious and Organised Crime Strategy* (2018). Similarly, HM Government’s drug strategy (2021) fails to mention CCE despite the central role children play in county lines (Ditcham, 2021b). Responsibility has fallen thus, on other organisations, charities and agencies to devise a strategy without the status of a statutory agency to guide practitioners. For example, the report by Turner et al. (2019) for the Children’s Society in which they highlight children and young persons who are criminally exploited experience a variety of responses, not all of them appropriate, due to inconsistent national and local safeguarding strategies. They blame the lack of a statutory definition of CCE. The report also highlights that of the 141 upper tier authorities that responded to their survey, 65 per cent had no strategy for dealing with this form of exploitation with the rest either claiming they had one or were working on developing one. Turner et al., (2019) also criticised the response for being reactive, the failure to identify opportunities to intervene earlier and noted that law enforcement responses took precedence over safeguarding, perhaps reinforcing the notion that CCE in county lines is a policing problem first and foremost. Chapter Two identified definitional issues. They impact not only the identification of CCE but its response, representing a major challenge and controversy concerning CCE in
county lines. It is a subject to which this research will return in the Findings and Discussion Chapters.

In concluding this section, the government is yet to conceive and implement an effective strategy to safeguard criminally exploited children or pursue their exploiters. Where the subject forms part of other strategies as mentioned above, they include responses to the problem that lack cohesion (Barlow, 2019). The lack of intervention by the Department for Education is a systematic failure to protect children and young persons from CCE when it should have played a bigger role given their knowledge of the impact of CSE scandals such as Rotherham (Calouri et al., 2022). In the opinion of this researcher, the absence of a national policy framework for the response to CCE in county lines is also a scandal.

3.3 Legislation

As identified in Chapter Two, CCE is not legally defined. Hence, this section covers the legislative instruments relating to child protection. In England and Wales, child protection is a complex multi-agency system requiring several organisations and individuals to fulfil their part (HM Government, 2018a). Discussed below are three relevant Acts of Parliament.

CCE has also been described as a form of human trafficking (Stone, 2018; Setter, 2019; Harding, 2020). Hence, further sections cover the Modern Slavery Act 2015, Slavery and Trafficking Orders and other legislation relevant to the protection of children and young persons.

3.3.1 Children Act 1989

The principal legislation on safeguarding children is the Children Act 1989. Section 17 of the Act pertains to the assessment of a child in need. Section 47 places a duty on the local authority to diligently and expeditiously conduct relevant enquiries where it suspects that “a child in their area is or is likely to suffer significant harm” so that it can, if necessary, safeguard that child. In some circumstances, whilst conducting those enquiries it may be appropriate to take the child into immediate protection.
When a child commits a crime due to neglect, family law may be the appropriate course of action (HM Government, 2018a). However, the Children Act 1989 is limited to exploitation within the family unit meaning that statutory interventions under the Act to combat CCE by perpetrators outside of the family are only possible where the child is beyond their parents’ control or where the parents prove themselves incapable and unwilling to protect their offspring (Firmin, 2017).

3.3.2 Children Act 2004

Section 11 of the Children Act 2004 requires organisations from local authorities and district councils to the police, National Health Service (NHS), National Probation Service, Youth Offending Teams (YOTs), Prisons and Young Offender Institutions (YOIs), Secure Training Centres and secure colleges to ensure that their functions, including any they out-source have safeguarding and promoting the welfare of children as their paramount concern (HM Government, 2018b). The Act defines these as:-

- “Protecting children from maltreatment
- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- Acting to enable all children to have the best outcomes” (Department for Education, 2021).

There are three statutory safeguarding partners defined under the Act (and amended in the Children and Social Work Act 2017) as

- “The local authority,
- a clinical commissioning group for an area any part of which falls within the local authority area and
- the chief of police for an area any part of which falls within the local authority area.”

They should form a strategic leadership group, coordinate their safeguarding services, engage and support others where appropriate, and implement the results of both local and national learning, for example, from serious child safeguarding reviews.
3.3.3 Social Services and Well-Being (Wales) Act 2014.

There is a statutory duty to report children at risk to relevant partners under the Act. Child criminal exploitation is a safeguarding issue whereby victims and perpetrators should be treated as children first and foremost with consideration given to their needs, similar to how any child should be treated (Wales Safeguarding Procedures, n.d.).

3.3.4 Police, Crime, Sentencing and Courts Act 2022

Whilst not directly focussed on CCE in county lines, the Act is the government’s response to serious violence. It places a duty on various authorities and agencies including the police and justice agencies to collaborate in evidence-based analyses of the problems related to serious violence and to instigate a response strategy. It is supported by a £70m investment in 18 multiagency Violence Reduction Units and a £200m investment over 10 years in the Youth Endowment Fund focused on preventing children and young persons from committing crime (APCC, 2020). Only recently enacted (April 2022), its impact on CCE in county lines cannot be judged at the time of writing.

3.3.5 Modern Slavery Act 2015


The literature on county lines is sparse but there has been far more on human trafficking that serves as a useful reference point for policy responses to county lines (Windle *et al.*, 2020). This is because the discourse on criminal exploitation in county lines echoes that of modern slavery (Setter, 2019), making it closely aligned with offences under the Modern Slavery Act 2015 (Harding, 2020). In the same manner, as in human trafficking, children and young people can become ‘trapped’ through debt bondage or as the recipients of gifts, feel indebted...
to their provider (Coomber & Moyle, 2018; Robinson et al., 2019). Although not written specifically for child exploitation or child trafficking in county lines (Hudek, 2018), prosecutions for county lines criminal exploitation under modern slavery legislation are possible. Those who traffic children and young persons in county lines to transport and sell drugs, therefore, can be charged with this offence as trafficking is a form of modern slavery (HMICFRS, 2017; Local Government Association and The Independent Anti-Slavery Commissioner, 2018). Use of the Act provides the police with an additional tool when dealing with CCE and that, unlike a drug conviction that is a badge of honour, the resultant stigma from being named a ‘child trafficker’ is a label the criminals would wish to avoid because it affects their treatment in prison (Spicer 2019a; Harding, 2020). The first successful prosecution using the Act was in 2018 against a male who trafficked children aged 14 and 15 to sell heroin and crack cocaine as part of a county line (BBC, 2018). Unlike adults, there is no necessity to prove that a child or young person was forced to commit the offence (Stone, 2018). The case of Regina v K, W, and A, 2018 EWCA Crim 1,432 reinforced the idea that children and young persons cannot consent to be trafficked meaning that the Modern Slavery Act 2015 seeks to protect this young group from the impact of their own decision-making (Youth Justice Legal Centre, n.d.).

The Modern Slavery Act 2015 encompasses a statutory defence in Section 45, recognising the UK’s international obligations not to punish those who commit crimes as a result of their exploitation. Section 45(4) specifically refers to trafficked children and young persons where a defence will succeed if it is shown that a child or young person:

“i) committed an offence as a direct consequence of their being a victim of slavery or relevant exploitation; and

ii) a reasonable person in the same situation and having the person’s relevant characteristics (including their age) would have committed the offence.”

Use of the Act could prove to be a more effective tool to protect criminally exploited children than some other tactics such as police crackdowns (Spicer, 2019a & b) as long as statutory safeguarding mechanisms are also in place (Robinson et al., 2019). Hence, defining criminally exploited children and young persons as victims of modern slavery could potentially lead to cultural changes where safeguarding practice takes precedence (Shaw & Greenhow, 2020).
However, progress in use of the Act has been slow as evidenced that between April 2015 and March 2016, no modern slavery cases were recorded in six of the 43 police forces in England and Wales. This prompted the government to commission an HMIC (now HMICFRS) inspection to ensure that all police forces treated modern slavery as a priority (May, 2016). The literature suggests therefore, that activity at the local level fails to treat CCE in county lines as a national problem. Consideration of CCE under the Act is largely down to interpretation (Barlow, 2019) whilst the aforementioned review urged for better training and called for specialist advocates in modern slavery (Haughey, 2016). There has been some progress from an early ambition for Independent Child Trafficking Guardians (ICTGs) in only one-third of policing areas (HM Government, 2018c) to their presence now in two-thirds (Maclean, 2021), but this is still not enough given that every policing area is experiencing CCE in county lines (NCA, 2019b).

HMICFRS’s (2017) report found that the Modern Slavery Act 2015 had not significantly improved the police’s response. The report found limited use of the Act, little understanding of the Section 45 defence, low levels of recording and limited referral to the National Referral Mechanism (NRM—described in more detail in section 3.4.3). They recommended that the police should prioritise the response, allocate appropriately skilled resources, coordinate activity and share information with partners, and put in place performance and quality assurance measures against which senior leaders could assess the service provided to victims.

Three years after Haughey’s review (2016) a further review identified widespread confusion and uncertainty amongst stakeholders calling on the government to implement the earlier recommendations (Field et al., 2019) indicating little progress, in contrast to the government’s stated aim to be a world leader in combating modern slavery (May, 2016; Gadd & Broad, 2018). The findings from a recent report still highlight that the responsible agencies continue to miss opportunities to protect British victims from exploitation often due to misunderstandings about modern slavery and a failure to recognise someone as a victim of exploitation resulting in them being treated as an offender (Murphy et al., 2022).

Therefore, there are several challenges and controversies involved in the use of Modern Slavery legislation. First, the lack of a universally adopted definition of child criminal exploitation has contributed to inconsistencies in its description and the identification of
victims (Turner et al., 2019). Another challenge is the inconsistency with which police forces identify those vulnerable to exploitation (HMICFRS, 2020). This may be because the government’s approach to modern slavery paints a crude, bifurcated construct of victims and offenders as separate concepts, with victims painted as delicate and submissive and offenders as violent and driven by greed (Gadd & Broad, 2018). This construct does not recognise that a child or young person can not only be a victim of exploitation but also an exploiter of others at the same time (Pitts, 2007; Coliandris, 2015; Moyle, 2019; McClean et al., 2020). Such simplistic constructs lead to the making of stereotypic assumptions as to who is a victim and how they should present, and is therefore, too reductive (Gadd & Broad, 2018) especially when considering the involvement of some children of their own volition who rebuff the victim label (Robinson et al., 2019), have constrained agency (Moyle & Coomber, 2017) or remain hidden behind tough exteriors (Windle et al., 2020). Also relevant is that older children will not be seen by some practitioners as victims of CCE who require a safeguarding response (The Children’s Society, et al., 2018; Chard, 2019). Hence, those that do not conform to such notions of victim fragility either through age or how they present may not meet the standard for the S45 defence or realise as a victim they could have a statutory defence (Barlow, 2019). This limits the use of the legislation and resultant protection to cases where there is a readily identifiable victim and police can focus on the perpetrator but less likely when the victim is nearly an adult, has criminal antecedents, where the exploiter is unknown or the child does not name them (Stone, 2018). It would appear, therefore, that before applying the defence, child victims are judged on their value or worthiness, as suggested by Shaw and Greenhow (2020). To support this finding further, Wroe (2021) highlights the case of two arrested minors, one referred to a project, and the other given a Slavery and Trafficking Order. The Act excludes certain serious offences under Schedule 4 meaning that the type of crime committed irrespective of the circumstances under which it is committed also determines whether a person is a victim or a perpetrator of a crime (Shaw & Greenhow, 2020).

Prosecutions have been slow to materialise possibly because of a mistrust by police who believe that all a dealer has to claim is to be a victim of trafficking to be released (Harding, 2020). This claim was debunked in an independent review of the Act which found no evidence
to indicate this was the case (Field et al., 2019) but the Act is not understood and is inconsistently used (NSPCC, 2020) resulting in just over 60 prosecutions linked to county lines (NCLCC, 2021). This represents an outcome of nugatory value considering there are between 6,000-8,000 exploitation suspects in the UK, though not all of these will be county lines cases (NCA, 2021). It is perhaps not surprising then that Turner et al., (2019) have called for the Modern Slavery Act 2015 to incorporate a definition of CCE to ensure a common approach that recognises the traumatic experience of exploited children, protects them from prosecution and assists the prosecution of those who should be. Despite a growing awareness of the legislation, case law such as the ECHR ruling on VCL and AN v UK and Court of Appeal Brecani v R shows that victims of coercion and exploitation are still prosecuted for the offences they commit while acting under duress (Ditcham, 2021a).

### 3.3.6 Slavery and Trafficking Risk Orders

Section 23 of the Modern Slavery Act 2015 enables law enforcement agencies to apply for an Order at Magistrate’s Court for an unconvicted person where, firstly, the court is satisfied that it is likely the person will commit an offence under the Act and, secondly, that to protect others from harm, the Order is necessary. Any violation is punishable with five years’ imprisonment (Home Office, 2017). However, the use of such Orders has been criticised for increasing the risk by disconnecting the person from support systems they may have in place (Hudek, 2018).

In addition to calls for CCE legislation by HMICFRS (2020), there have also been calls for Child Criminal Exploitation Protection Order to protect young people (Ford, 2018) and the use of such Orders as preventative legislation to become embedded in police culture as a way of dealing with exploitation (NCLCC, 2021).

### 3.3.7 Section Summary

In conclusion, the current legislation would not appear to meet the needs of dealing with CCE in county lines and that bespoke legislation that defines CCE, and promotes extra familial child protection through safeguarding is missing from the current landscape. Safeguarding is examined in more detail in this last section on the Operational response.
3.4 Operational

Multiagency working is paramount for effective safeguarding and child protection (Sidebotham et al., 2016). As identified earlier, the Children Act 2004 requires the three safeguarding partners to collaborate (with other relevant organisations) to protect the welfare of children in their area through safeguarding them (HM Government, 2018d). Ofsted (2018) suggests that the response to those who exploit children has to incorporate policy coordinated among the relevant agencies that ensures protection and support for the victim as well as disruption and prevention of the exploitation. All statutory agencies and government departments therefore, need to understand fully their role in both recognising and disrupting CCE (Turner et al., 2019).

This list of partners in this space is manifold who are represented in Local Authority Safeguarding Partnerships, formerly known as Local Safeguarding Children Boards (LSCBs), under the Children Act 2004, and amended by the Children and Social Work Act 2017.

The following five sections examine different aspects of the literature on operational responses to CCE in county lines.

3.4.1 Referrals

Figure 3.1. shows the referral mechanism for when a practitioner has concerns about the welfare of a child or young person. It details the local safeguarding process whereby the local authority social services or local police convene a safeguarding partnership meeting, also known as a multiagency safeguarding hub (MASH). The responsibility of the local authority under section 47 of the Children Act 1989 was described earlier. The National Referral Mechanism (NRM) is another route. Both are discussed in the following two subsections, identifying the challenges and controversies evident from the literature.
Figure 3.1: the referral process adapted from *Criminal Exploitation of children and vulnerable adults: county lines guidance* (Home Office, 2018)

### 3.4.2 Safeguarding Partnership Meetings

The term safeguarding is wider than child protection. It includes the promotion of the health and development of a child or young person and the meeting of their welfare needs (Ministry of Justice, 2019). However, the existing legislation and provisions for safeguarding were written to address harm in the familial setting and insufficient, therefore, for CCE in county lines to address risk outside the home (Chard, 2015; Ford, 2018; Wroe, 2019). Contextual safeguarding, developed at the University of Bedfordshire, is a way to understand harm inflicted on a child or young person from outside their family and identifies both policy and practice guidelines for safeguarding young persons. It applies to those who are vulnerable to county lines exploitation, adverse experiences at home, or within the wider family, peer group, schools, and neighbourhood that can make a child vulnerable to exploitation (Firmin, 2017). As such, it is a system recommended to address the limitation of child protection legislation (The Children’s Society, *et al.*, 2018).
Barlow (2019) developed a theoretical framework as a way to understand the contexts, circumstances, and relationships in which exploitation can occur. In his ‘circles of analysis’ intended to improve professional assessment, investigation and intervention for responding to CCE, he argued that the authorities should consider the factors that maintain the relationship between a child, their perpetrator(s) and their environment. The origins of two of the three factors in his theoretical framework, the child and their wider environment are visible in contextual safeguarding.

The other route mentioned above as illustrated in figure 3.1 is referral through the NRM.

### 3.4.3 National Referral Mechanism (NRM)

The NRM is the instrument for both identifying victims and making sure they get support, such as accommodation, therapeutic help, and legal advice (HMICFRS, 2017). This is mainly relevant for adults victims, so, once a conclusive grounds decision that a child or young person is a victim of slavery or trafficking is made, the NRM does not provide additional support for them, but it does inform the responding authorities that the child is a victim, not a perpetrator, and it could increase their priority status, or have bearings on criminal justice proceedings already instigated (Ministry of Justice, 2019). This latter point has since been challenged in the ruling in Brecani v R (2021) EWCA Crim 731 where an earlier decision to admit such evidence in the case of DPP v M was overturned on the basis that the Single Competent Authority (SCA) responsible for making conclusive grounds decisions are not experts in modern slavery/human trafficking.

The NRM is both underused and ineffective (Setter & Baker, 2018; Koch 2019). Research also revealed that it is sometimes used by social workers just because it is mentioned on a safeguarding checklist, not because of a real understanding of its purpose (Calouri et al., 2022). Other recent research highlighted that British nationals who are victims of modern slavery have encountered difficulties accessing services and support, often being referred again to local authorities rather than specialist services designed to be accessed through the NRM (Murphy et al., 2022). Despite these claims, there has been an increasing number of referrals made to the NRM from 2,340 in 2014 to over 10,613 in 2020 with criminal exploitation one of the most prevalent forms of modern slavery in the UK. In 2020, there
were 1,404 modern slavery referrals identified as county lines cases, 1,271 of which were children, accounting for 90.5 per cent of all referrals (Havard, 2022)(See Figure 3.2). In the second quarter of 2022, there were 589 county lines referrals, the highest quarterly number since collecting this data. 14 per cent of all referrals were for county lines cases: at 446, male children accounted for three-quarters (Home Office, 2022).

Figure 3.2: NRM referrals for county lines, children and adults (Havard, 2022)

It is, however, important to exercise caution in interpreting such data. Not only are government reports noted for concerns re their partiality (Windle & Silke, 2019) but the NCA (2019) itself admit that these numbers do not represent the full extent of exploitation as they underestimate the size of the problem due to data recording irregularities.

3.4.4 Safeguarding as a Response

Despite the claim that responses need to be credible, coordinated, consistent and tailored to their local community (Harding, 2020; Pitts, 2021) there is minimal advice available to safeguarding practitioners in either of the two Children Acts previously listed, or from the
Department for Education (2018) publication or any of its supplementary guidance. One explanation could be that neither the Children Acts nor the Modern Slavery Act 2015 define exploitation (Barlow, 2019). Consequently, many local authorities have not established policies or procedures and in cases where they exist, they could be misinterpreted (Turner et al., 2019; Maxwell et al., 2019). For example, only 42 local authorities out of 355 in England and Wales identified they had a defined local response (Barlow, 2019). This finding is in contravention of guidance issued that local partnerships should know about the risks of exploitation in their area at both an operational and strategic level to avoid repetition of the tardy response to CSE made by some partners (Ofsted, 2018).

It is evident that county lines is challenging the current familial harm-focused child protection system with the identification and understanding of the exploitation of vulnerable children described as ‘variable’, both organisationally and across geographies in the UK (Hudek, 2018; HASC, 2019). Many organisations working with children and young persons do not know the signs of exploitation and engagement in county lines (Interventions Alliance, 2021). This has led to inconsistencies in the service vulnerable children receive (HMICFRS, 2017). Additionally, the police and other practitioners do not feel equipped to identify and respond to CCE (Shaw & Greenhow, 2019) meaning they require more training so that they can recognise CCE better and understand its associated risk factors (Ofsted, 2018; Maxwell et al., 2020).

Missing too from the response is multiagency working at a strategic level, meaning that often responses come from several separate safeguarding partnerships/boards with non-coterminous geographical jurisdictions constraining effective multiagency responses (Traverse, 2021). Existing research identified silos, the compartmentalising of a problem or issue (Hood et al., 2016) and poorly coordinated work as a hindrance to responding to exploitation (Ofsted, 2018; Barlow, 2019; Mills & Unwin, 2020; Shaw & Greenhow, 2020; Pitts, 2021).

To receive appropriate support, there is a need to recognise the person as a victim as identified in the policy framework (e.g., Home Office, 2018; Department for Education, 2021b). However, where a child is a victim of CCE, the criminal justice and not the child
safeguarding system still takes precedence (Barlow, 2019). This results in a disjointed and varied practice response across the UK (Child Safeguarding Practice Review Panel, 2020; Shaw & Greenhow, 2020) despite guidance that vulnerability in preference to prosecution-led approaches should be the focus (Shaw & Greenhow, 2019). Therefore, a recurring theme is that too often children and young persons are regarded as perpetrators in cases of CCE (Shaw & Greenhow, 2020; Howard League for Penal Reform, 2020) while children’s own experiences of practitioners’ responses reveal victim-blaming and punitive measures (Gearon, 2019). At a national level confusion reigns as to whether criminality or child protection needs take precedence. Furthermore, the policy on exploitation is applied inconsistently by the criminal justice system as it is hidebound to consider cases on an individual basis (The Children’s Society, et al., 2018). Consequently, safeguarding partnerships pull in one direction whilst criminal justice agencies pull in another. The lack of coherence means that responses treat CCE as an individual problem, in one case directing one person to a youth justice agency, and in another, to work (Andell, 2019). This means that affected children and young persons are at the mercy of competing priorities and discord in local services. To date, the focus of the response to exploitation of girls is in the form of CSE (Clarke, 2018) whereas for CCE the highest risk group is boys aged between 14-17 years (NCA, 2016; Barlow, 2019). In particular, looked-after children, children already known to the child welfare services or those known to Youth Offending Teams are a high risk group (HM Government, 2016; Andell & Pitts, 2018). This age group does not necessarily conform to assumptions about victims who need safeguarding, often leading to them being labelled as offenders (Sturrock & Holmes, 2015; The Children’s Commissioner, 2018; Clarke, 2018; Gadd & Broad, 2018; Barlow, 2019) despite a call for them to be seen as a ‘child first, offender second’ (Association of London Directors of Children’s Services [ALDCS], 2018). Whilst the segregation between offender and victim help services decide who needs support, and those that require punishment, in this context, it is of little assistance in providing interventions that would address the safeguarding and public protection needs of vulnerable children (McGhee & Waterhouse, 2002). The absence of effective safeguarding responses was criticised recently by Dame Sara Thornton DBE QPM (a former Chief Constable and Anti-Slavery Commissioner and now Professor of Practice in Modern Slavery Policy at the University of Nottingham) who commented on the practical
problems associated with safeguarding a victim who owes money to criminals as a ‘wicked problem’ (Calouri et al., 2022).

The response, therefore, necessitates a joint intervention and safeguarding approach between the police and social care agencies (Barlow, 2019). This is especially true for those that may not see themselves as a victim, perhaps because they enjoy the lifestyle, need the money and see it as preferable to some other ways of earning a living, or fear retaliatory action if they try to leave (The Children’s Society et al., 2018; Moyle, 2019). Practitioners who interpret the involvement of older children as a lifestyle choice may struggle to see their participation as a safeguarding issue and therefore, such young persons may fail to meet current service thresholds (Maxwell et al., 2019). In such cases identifying vulnerability beneath hardened exteriors, (Windle et al., 2020) for over-stretched practitioners is a challenge but guidance urges agencies to remain in contact with children who are unwilling to engage and to see their behaviour in a wider context (Ofsted, 2018). Given the recognition of the importance of safeguarding, it is perhaps surprising that there is no national strategy covering the safeguarding of juveniles who suffer harm from outside their families (Firmin et al., 2019) and that despite the existence of child criminal exploitation through county lines being reported for at least seven years, children’s services remain aligned more towards familial harm and have failed to adapt to these newly recognised challenges (MacAlister, 2022).

In sum, victims of exploitation and trafficking through county lines remain poorly treated despite growing awareness of this as a policing priority (HMICFRS, 2020). This is either because CCE is not considered enough when an investigation commences, meaning victims are wrongly prosecuted or when a decision is made not to prosecute, victims are poorly protected because of ineffective safeguarding (Independent Anti-Slavery Commissioner, 2022).

The ultimate part of this section considers some of the main law enforcement responses to CCE in county lines.

3.4.5 Law Enforcement
Police work involves an increasing focus on issues of vulnerability, for example, safeguarding vulnerable persons, child protection, and repeat MISPERS (House of Commons Home Affairs Committee, 2018). As such they should be well equipped to identify those children that need safeguarding including children who commit crime who are still entitled to safeguarding just as any other child. But the evidence here suggests otherwise, despite guidance that expressly mentions that children arrested for possession of drugs could have been exploited through county lines (HM Government, 2018c). The police do not use a marker, such as a vulnerability flag on their computer systems for CCE, meaning that children arrested for possession with intent to supply drugs (PWITS) may not be treated as vulnerable (Maxwell et al., 2019), irrespective of best practice in child-centred policing (CCP) that urges responses to children who are exploited and commit crimes as victims rather than as offenders and are not needlessly criminalised (NPCC, n.d.a). However, the police as first responders are not the most appropriate agency to assess vulnerability. Whilst the NCLCC and policing in the three exporting towns identified earlier have benefited from access to extra funds, due to underfunding there are still few services directly accessible for children and young persons or practitioners (The Children’s Society et al., 2018). This is compounded by an almost 70 per cent cut in local authorities’ spending on youth services across England, and over 90 per cent in Gateshead, where funding has fallen from £6,958,000 in 2010/11 to £277,000 in 2019/20 (Black, 2020). There has been a complete loss of funding in Luton, Medway, Slough and Trafford (YMCA, 2020). Cuts in Wales have been less acute than in England but still amount to almost 40 per cent nationally with Cardiff experiencing the biggest cuts at 64 per cent (YMCA, 2020). It is perhaps then not unsurprising that the responding agencies may regard as ‘lesser victims’ those that through their general demeanour are unwilling to cooperate with them and/or seek to protect older OTD (Windle et al., 2020).

Given the increased number of NRM referrals mentioned earlier, the impacts of austerity and cuts in the budget of welfare and criminal justice services, it is unlikely that adequate resources are in place to achieve targets for reform (Gallagher, 2017). Little surprise then that thresholds to access relevant services are too high, meaning that young people have to be at a crisis point before they receive help (Ford 2018; Pitts 2021) or that both parents and professionals find it difficult to get support (Spencer et al., 2019; Turner et al., 2019).
Exploitation and vulnerability are difficult to identify and respond to, especially when relevant agencies are poorly resourced (Haines & Case, 2018) but extensive cuts mean responses are reactive as opposed to proactive despite awareness that the latter is more successful in protecting young people from county lines exploitation (Hudek, 2018; Turner et al., 2019). Early intervention and building resilience through multiagency approaches have the potential to provide opportunities to leave working in county lines and its associated harms behind (Coliandris, 2015; Robinson et al., 2019; Spicer et al., 2019; Moyle, 2019). So, despite questions about the effectiveness of short-term reactionary interventions versus longer-term proactive strategies (Andell & Pitts, 2017), funding is a major barrier to achieving these ambitions. What is needed is government investment to fund services for children and young persons and move the response out of the criminal justice system (Dwyer, 2017). To help achieve this ambition, in addition to the publicised 20,000 extra police officers (Home Office, 2019b) there have been calls for an extra 10,000 trained youth workers (National Youth Agency, 2021).

This next section considers the range of tactics such as test purchase, zero tolerance and crackdowns the police have at their disposal to respond to CCE in county lines (Spicer, 2019b). Perhaps the most visible response in the media, if not ‘choreographed’ for the mass media (Innes, 2014) is the use of crackdown operations through so-called ‘intensification weeks.’ The police and NCA in particular are keen to promote the use of this tactic, frequently boasting large numbers of arrests and cash seized (e.g., NCA, 2019c). Ironically, reactive local policing activity such as this risks encouraging more professionalised markets taking over to replace the low-hanging fruit of the small-scale distribution networks and user-dealers (Harding, 2020). These are often more predatory by nature and lead to an increase in violence (Spicer, 2019a). In this context, arresting exploited people can make them more vulnerable (HMICFRS, 2020). It is not surprising, therefore, that such activity is referred to as symbolic policing (Coomber et al., 2017). However, such criticism does not acknowledge that the police need to be seen to be doing something (Bacon, 2016) and that crackdowns have many aims that go beyond arresting suppliers such as demonstrating police power (Dorn et al., 1992) and totemic toughness (Stevens, 2011).
Claims of large numbers of safeguarded persons, often at numbers beyond the resources of the statutory agencies, question what definition of ‘safeguarded’ was used, from one end of the spectrum where a person is removed from harm to the other where nothing more than a referral form to another agency is made. More recent reporting has reflected a more nuanced terminology of vulnerable persons ‘engaged for safeguarding purposes’ (e.g., NPCC, 2022) reflecting that the safeguarding of vulnerable populations is a more complex issue than the initial claims would suggest. The impact such crackdowns have on those who criminally exploit children and young persons is debatable, but arresting suspected offenders is a primary function of the police. Although the research shows that compared with other serious offences, police forces do not focus as much attention on county lines, the intensification weeks are worthwhile, especially when focused on multiple line holders (HMICFRS, 2020). The reality is the police will continue to arrest street-level dealers through tactics such as crackdowns (Coomber et al., 2017) despite vowing to protect the vulnerable from perpetrators, but the police cannot hope to just arrest their way out of this problem (Moyle, 2019). Hence, the county lines drug distribution model highlights the need for the police to work together strategically across policing boundaries, especially where a child goes missing in one policing area and is found in another carrying Class A drugs (HMICFRS, 2020).

As part of HM Government’s Strategy (2018d), Regional Organised Crime Units (ROCU) target organised crime groups (OCG) whose crimes cross police force boundaries, through the provision of specialist policing tools. The typical case of a child from one area found in another as above, highlights the need for good communication and information sharing between the police and children’s services in both areas. Unfortunately, this was not the case in all of the areas visited by Ofsted (2018). It is an area examined and reported on in the findings of this research.

Recognising the absence of a coherent national picture and in response to growing concern about county lines, the government created and funded the National County Lines Coordination Centre (NCLCC) in 2018. This is in addition to the County Lines Working Group formed in November 2016 to drive cross government and agency responses to county lines (HM Government, 2018a). One of the NCLCC’s responsibilities is to develop a national intelligence assessment of child criminal exploitation (Maxwell et al., 2019). Additional Home
Office funding in 2019 helped establish dedicated county lines task force teams in three main exporting areas of West Midlands, Merseyside, and the Metropolitan Police Service (MPS) as well as with the BTP. Prior to this the police struggled to coordinate activity against those controlling the lines and exploiting the vulnerable (NCLCC, 2021). Over the years, successive NCA reports (2015, 2016, 2017, 2019b) and the creation of the NCLCC have helped improve levels of understanding. The number of deal lines is down from 800 in the previous reporting to approximately 600, but the NCLCC (2021) acknowledges it may be due to changes in reporting guidance. However, both the working group and the NCLCC, as it name implies, focus on county lines, not CCE and therefore, its remit is not to coordinate the response to criminally exploited children. As stated earlier this keeps the focus firmly on county lines as a drug supply issue rather than the exploitation of a vulnerable population.

3.5 Conclusion and Identification of the Knowledge Gap to Which this Research Seeks to Contribute

The complexities of offending and safeguarding in county lines highlight the need for more research to support nuanced responses. In particular, the barriers to effective responses include limited police and support service resources, problems with information sharing, and friction in multiagency partnerships (Olver & Cockbain, 2021).

Whilst there is a raft of legislation that could be used to safeguard victims and prosecute offenders, it was not designed specifically for CCE. Similarly, there is very little guidance on responding to CCE contained within government documents. Where it exists, it forms a small part of other strategies indicating that the government has been slow to recognise and respond to CCE despite classifying it as a national problem. This helps explain the situation why when the responding agencies encounter a child or young person in connection with CCE in county lines, there is a disconnect between the criminal investigation, the safeguarding process under child protection legislation and the NRM process. They all take place in splendid isolation rather than as one process relevant to that child whether they be a victim or perpetrator of CCE (Calouri et al., 2022). It appears that lamentably lessons have not been learnt from the CSE scandals such as Rotherham and Rotherhithe.
There are several statutory and non-statutory organisations with the responsibility to safeguard children and prosecute those that exploit them. However, there are no real national structures outside of the NCLCC, perhaps as a reflection that the government sees county lines more as a drug supply than an exploitation issue and hence the responsibility of law enforcement. This is not surprising since the Home Office have assumed lead responsibility but have no child protection or safeguarding remit. With a limited understanding of the phenomenon coupled with the lack of a policy framework, organisational structures at the national level and relevant legislation, it is difficult to see how the current response to CCE in county lines can be improved upon, by whom and in what way(s). This is a gap in the collective knowledge, understanding and response to the issue. It is the purpose of this inductive research study to establish the challenges and controversies of dealing with a national problem at the local level through primary research conducted with relevant academics and practitioners to establish what is missing from the current response and to make recommendations for future practice and policy. By doing so, it makes an original contribution to both knowledge and practice in this highly contemporary and important area. Before moving onto the results of the primary research conducted for this thesis, the next chapter outlines the research methodology and the methods used in this study.
4.1 Introduction

Having introduced the focus of this research in Chapter One and the extant theory, knowledge, and practice as conveyed in the available academic and grey literature in Chapters Two and Three, this chapter covers the research methodology adopted. As a record of the research, it serves to articulate what has been considered and how it was done (Dunne et al., 2005). The chapter divides into a further four parts after this section introduces the chapter. Part two covers the research problem and examines the research questions. Part three details the research design under ten sub-sections from the methodology to the analysis of the research data. The fourth section highlights the limitations of this research and the final part serves as a summary of the key concepts within the chapter. It begins with a review of the research problem and the four key research questions.

4.2 Research Problem

The research focuses on child criminal exploitation in county lines in England and Wales and asks what are the challenges and controversies of dealing with a national problem at the local level.

4.2.1 Theoretical Framework

As previously mentioned, this study examines the research problem above with reference to the policy context, legislation and operational practice. This forms the theoretical framework adopted in this thesis. It was chosen because early engagement with the literature on the subject indicated that both the identification of CCE in county lines and the response to it broadly fitted into these three classifications. Two chapters specifically use these headings, either when reviewing the literature (Chapter Three) or making recommendations for future practice (Chapter Eight). In the other chapters the link to the theoretical framework is more implicit but nonetheless is present throughout this thesis.

4.2.2. The Research Questions
The aims and objectives of this study were outlined in Chapter One. These aims were then translated into four research questions that drive this research as suggested by Robson and McCartan (2016), exploring the problem identified above.

Firstly, “How is child criminal exploitation constructed and understood in county lines in England and Wales by the police and those agencies with whom the police engage when dealing with criminally exploited children?”

Secondly, “How does this understanding influence and shape how the police and those agencies respond to criminally exploited children?”

Thirdly, “What challenges and controversies does the current response present to both the police and the agencies with whom they work?”

Lastly, “What would be the implications for future policy and practice when identifying and dealing with child criminal exploitation in county lines?”

These four questions formed the basis of the interview schedules used (see Appendix B).

4.3 Research Design

This section on the research design covers the methodology, reflexivity, method employed, interview schedules, ethics, sampling strategy, inclusion criteria, sample size, participants in the research and data analysis. It begins with the methodology.

4.3.1 Methodology

A person’s ontological and epistemological position influences the selection of which research paradigm they choose, i.e., their methodology (Pryor & Ampiah, 2004). A paradigm is a system of beliefs that acts as a framework to steer the researcher through what they should study, how it should be conducted and how they should translate the results (Bryman, 2016).

In designing this study, the researcher followed a logical path that started with the identification of their ontological assumptions, then their epistemological position, moved on to their methodological considerations followed by the identification of the research instrument used and lastly, the data collection (as suggested by Hitchcock & Hughes, 1995).
This sequence informs the reader of the theoretical framework that sits behind a piece of work and how this has influenced and defined the specific nature of that work (Mertens, 2005) as well as how knowledge is studied and understood (Bogdan & Biklen, 1998). The selection of a paradigm, therefore, establishes the motivations behind the study as well as the researcher’s intent and signals to the reader what to anticipate from it. In summary, the choice of paradigm is the bedrock for the next steps, i.e., the choice of methodology, the method(s) employed, the literature review and the research design (Mackenzie & Knipe, 2006).

Beginning with ontology, as suggested above, it is generally split into two groups, objectivism where reality exists independent of social actors and constructionism or constructivism, the opposing opinion that the world can be interpreted through the views and experiences of social actors. The researcher’s ontological position is as a constructionist, forming meaning through interpreting the words of the research participants who elucidate their perceptions and understandings (Crotty, 1998). In this study, the researcher wanted to hear the experiences of the police and other workers with whom they engage when identifying and dealing with child criminal exploitation in county lines. This ontological position adopted by the researcher acknowledges that the knowledge gained originates from reflection on events as well as experiences (Ormston et al., 2014). Here, rather than using the data to test a theory, the theory generation is an inductive process (Ormston et al., 2014). As a constructionist, the researcher regards context as important, recognising there are many approaches, so, it is necessary to clearly define the ground rules to establish a position (Dunne et al., 2005). Throughout this chapter these ground rules covering how the research was designed and conducted are explained.

The second step identified by Hitchcock and Hughes (1995) corresponds to epistemology, which consists of positivism, the method in which social reality is studied in the natural sciences, and interpretivism, the opposite of positivism. The latter postulates that the social world cannot be examined using methods of the natural sciences and lends support to the subjective meaning of social (inter)-action (Bryman, 2016). The position adopted by the researcher is interpretivist, believing reality is socially constructed through listening to the ‘stories’ of the research participants (Cresswell, 2003). This would be crucial to answering
the research question on the challenges and controversies of dealing with a national problem such as child criminal exploitation in county lines in England and Wales at the local level.

Interpretivist researchers need to be cognisant of the effect their beliefs and experiences could have on the research and therefore, their role in the research (Brannick & Coghlan, 2007). Put more succinctly, how the impact of experiences shape both the research design and methodology (Dunne et al., 2005). The researcher adopted an interpretivist philosophy to answer the what and how questions set out earlier as suggested by Silverman (2013). Namely, how child criminal exploitation in county lines is constructed and understood in England and Wales by the police and some of the agencies with whom the police engage (RO1). To establish how this understanding influences and shapes how the police and those agencies respond (RO2). To understand what are the challenges and controversies the current response represents to both the police and the agencies with whom they work (RO3). And lastly, based on the findings from ROs1-3, what the implications for future policy and practice would be when identifying and dealing with child criminal exploitation in county lines (RO4).

In this next section the choice of research paradigm is discussed. The two main research paradigms are quantitative and qualitative. Academics have invariably sought to directly align the quantitative and qualitative paradigms with research methods (e.g., Guba & Lincoln, 2005). Quantitative research is often linked closely to the positivist tradition, whilst qualitative research aligns itself with the constructivist and interpretivist philosophies. Though this is often the case, neither paradigm is entirely nor exclusively associated with a specific theoretical position (Bryman, 2016). This leaves researchers free to choose the method(s) best suited to meet the aims of their research and answer their question(s) (Lewin, 2005; Silverman, 2013).

To answer the research question the researcher identified that the qualitative paradigm derives meaning from the words of the participants and generates meaning, concepts, and theory from those words. The key arguments for the use of this paradigm are that it is less structured than quantitative research making use of ‘rich, deep data’ to identify meaning and is conducted with actors operating in the real world (Bryman, 2016). Here, truth is a
subjective reality experienced uniquely by each person (Vishnevsky & Beanlands, 2004). The theoretical assumptions indicate that the participants socially construct reality (Cresswell, 2003) and as such its axial assumption is value-laden. However, as stated, the researcher is considered close to the subject and their role has an impact on the research (Brannick & Coghlan, 2007). The impact of this therefore needs to be managed and is discussed in section 4.3.2 on reflexivity.

Reflecting on these considerations, the researcher selected a *qualitative* research methodology as the most suitable paradigm for this study for the following reasons.

1. To answer the research question requires sound descriptive analysis and hence leans towards the *qualitative* rather than the *quantitative* paradigm.
2. The *qualitative* paradigm is of more benefit to policymakers than *experimental* or *quantitative* approaches (Lösel, 2008). As the intention is that the results of this research influence policy and practice as well as add to the extant knowledge, this is the right paradigm to adopt.

Table 4.1 summarises the main differences in the ontological, epistemological, and axial assumptions of the *quantitative* and *qualitative* research paradigms discussed above.

<table>
<thead>
<tr>
<th></th>
<th>Quantitative</th>
<th>Qualitative</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ontology</strong></td>
<td>Reality already exists waiting to be discovered</td>
<td>Reality is socially constructed</td>
</tr>
<tr>
<td><strong>Epistemology</strong></td>
<td>Independence of the researcher to the data and sources</td>
<td>There is a relationship between the researcher and the data they produce</td>
</tr>
<tr>
<td><strong>Axiology</strong></td>
<td>Value free</td>
<td>Value laden</td>
</tr>
</tbody>
</table>

Table 4.1: Illustration of theoretical assumptions between quantitative and qualitative research

4.3.2 Reflexivity
Having elected for a *qualitative* paradigm, there is yet one more consideration before turning attention to the choice of research method(s). Researchers using a *qualitative* methodology form an integral part of the research and must therefore ensure that they either reduce or mitigate the bias and preconceptions they have in their role, thereby making sure to avoid any adverse effect on the quality of their research. This process is called *reflexivity* and is widely reported in the academic literature (e.g., Scott, 1999; Finlay, 2002a, 2002b; Brannick & Coghlan, 2007; Bryman, 2016; Gray, 2017).

In Chapter One, the researcher outlined their motivation for the study and hinted at their connection with the subject matter. This section lays bare the researcher’s background, their prior knowledge of CCE in county lines along with their relevant professional experience. It also covers the steps taken in the design of the research to reduce any bias or other influence that could harm the data collection and data analysis.

In choosing any field of study, the researcher needs to be sure, and as part of the ethical application process, able to convince an ethics committee that they can legitimately access a research population that can potentially satisfy the aims and objectives of the research. A small pilot study conducted in 2019 as part of the Professional Doctorate proved an invaluable vehicle to gauge what level of access the researcher might expect for this main study: a key consideration for the researcher early in the Professional Doctorate given that they have since retired from law enforcement. Reiner and Newburn (2008) identified four types of relationship that exist between a researcher and the police. Using their nomenclature, the researcher is an *outside insider*. This group consists of ex-police officers conducting police research. They argue that *outside insiders* benefit from better access to the police than *outside outsiders* (those with no previous connection with the police) but are not as privileged as *inside insiders*, i.e., those still working within and wishing to research the police. This is known as *insider research* and is often disqualified because of claims that the researcher had a personal and emotional stake in the research, which meant the study did not conform to the required intellectual rigours (Anderson & Herr, 1999). Conversely, the central problem *outsider* researchers face is one of access (Brannick & Coghlan, 2007). Insider researchers have the distinct advantage of not needing to negotiate access to research populations and can develop and enrich theoretical and analytical opportunities to understand crime for the
benefit of all (Contreras, 2015). Insider-led research can greatly assist work practices but this type of research is not without flaws (Nixon, 2008): hence it requires that the researcher rationalises the benefits and appropriateness of the research (Costley & Lester, 2012).

It is important to now turn attention to how the potentially negative impact of status as an outside insider (Reiner & Newburn, 2008) could affect the research as identified in the opening comments of this section on reflexivity. Whilst the researcher previously worked in law enforcement for 32 years, it is important to highlight that at least half of this was spent working internationally on organised crime (OC), particularly targeting drug trafficking at the bulk supply end, and the organised crime groups (OCGs) behind it. In other words, at the other end ‘of the telescope’ from the street dealers. The researcher has never worked in any capacity directly on child criminal exploitation (CCE), county lines, gangs, child protection, or safeguarding from a law enforcement perspective. They have, however, in the case of the latter as a school governor with lead responsibility for safeguarding. Hence, the knowledge the researcher possesses of CCE in county lines is described as a priori and gained since 2019, nearly a year after embarking on the Professional Doctorate. It has been gleaned from reading academic journals and books, as well as the grey literature produced by the NCA and HM Government, for example, as well as media reporting. This knowledge has been further supplemented through the conduct of the pilot study in 2019 into vulnerability associated with CCE and county lines.

Although the researcher is an outside insider (Reiner & Newburn, 2008) recognition should be given to how a researcher’s identity is not something they possess, rather, as in other identities, it is something that exists through performing it (Butler 1990; Sarup, 1996). Punch (2004) supported this notion of fluid identity when he argued that researchers are unlikely to adopt one fixed identity, especially in a research context where the disclosure of the purpose of the research might lead to loss of access. This can present researchers with an ethical dilemma, who whilst committed to openness in research might find the research context challenges this position. Hence, researchers are likely to have many and pluralistic research identities (Dunne et al., 2005).
Having identified the potential negative influences the researcher’s knowledge and experience of CCE and county lines could have on both the design and conduct of the research, the following measures were applied to reduce and mitigate their possible harmful impact.

- Honesty and transparency that identifies the reflexivity, ontological and epistemological assumptions in the research design, collection of data and data analysis are articulated clearly throughout this thesis so that the reader can readily identify the processes involved in the research and how the conclusions were identified (Scott et al., 2004).
- There has been a constant reflection on the research design and data collection analysis through self-questioning to justify why something is included or excluded from the data presented in this thesis. The ‘unused’ data may form part of an academic journal.
- Also, a continual examination of texts used by academic authors prevalent in the field of CCE and county lines up to the point of submission, and their inclusion or justification for exclusion is articulated in the literature review.
- Lastly, regular interaction and checks with the Supervisor on the points above provided an extra layer of oversight and challenge to the researcher to ensure the negative impact of biases and preconceptions was reduced or eliminated where practicable.

4.3.3 Method

This thesis includes the results of two research studies. The first is a pilot study exploring issues of vulnerability in CCE and county lines. This study was conducted between May and August 2019. It proved a useful tool to test the theoretical assumptions, research methods and access to the research population carried forward to this larger study. Three persons from the pilot study took part in the research for this thesis, conducted between 2020 and 2022. Despite the different nuances of the focus of the second research project, it allowed the researcher to confirm whether their previous views still held true and for them to outline changes that had occurred since we last spoke. The pilot study found that the lack of a
standard definition of a vulnerable person within policing represented a flaw in their understanding of vulnerability. This weakness impacted the ability of the police to deliver effective and sustainable responses as suggested by Coliandris (2015). The relevant findings from both studies are found in Chapters Five to Seven.

Research methods refer to how the data is collected and analysed as opposed to the research methodology that, as previously described, links the approach to research to a theoretical paradigm (Mackenzie & Knipe, 2006). There are several methods associated with qualitative research. The most common ones are split into two main groups, observation, and survey. The restrictions on travel and association due to the Covid-19 pandemic made the former impossible. Therefore, the researcher’s attention turned to the second group. Survey research includes the use of questionnaires, administered either by post or via the internet, and interviews. The suitability of these survey methods for this study was analysed and compared using a set of criteria adapted from Robson and McCartan (2016) and Bryman (2016). See Table 4.2 below.

<table>
<thead>
<tr>
<th>Mode of survey administration</th>
<th>Internet-based survey</th>
<th>Postal questionnaire</th>
<th>Interview in person</th>
<th>Telephone/Video interview</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timeframe for data collection</td>
<td>Short</td>
<td>Long</td>
<td>Medium/Long if required to travel long distance</td>
<td>Short/Medium</td>
</tr>
<tr>
<td>Cost</td>
<td>Nil</td>
<td>Low/Medium depending on the cost of stamps to send and receive replies could be prohibitive</td>
<td>Can be high if required to travel long distance</td>
<td>Nil</td>
</tr>
<tr>
<td>Opportunity to build rapport</td>
<td>Limited</td>
<td>Limited</td>
<td>Very Good</td>
<td>Good</td>
</tr>
</tbody>
</table>
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

<table>
<thead>
<tr>
<th>Control of question order (check)</th>
<th>Can require an answer before being able to move to the next question</th>
<th>Cannot control order answered</th>
<th>Very good</th>
<th>Very good</th>
</tr>
</thead>
<tbody>
<tr>
<td>Response rate</td>
<td>Low/Medium</td>
<td>Low/Medium</td>
<td>High</td>
<td>High</td>
</tr>
<tr>
<td>Response bias</td>
<td>Medium/High</td>
<td>Medium/High</td>
<td>Low</td>
<td>Low</td>
</tr>
<tr>
<td>Adopted?</td>
<td>No</td>
<td>No (due to the pandemic)</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>

Table 4.2: Comparison of research methods adapted from Robson and McCartan (2016) and Bryman (2016)

When considering interviews, face-to-face interviews are ideal, but they can be expensive and time-consuming, certainly if the research population is widespread, and the researcher has to travel long distances. This was not possible due to travel restrictions and limits on social interaction imposed in response to the Covid 19 pandemic. It also meant that rapport-building around those so-called ‘water-cooler moments’ to build cohesive relationships (Allsopp et al., 2021) was not possible and this is one drawback of non-in person interviews.

Interviews conducted via the telephone or video link, therefore, represented a pragmatic, inexpensive solution to achieving the research aims especially with the knowledge that there is no evidence they produce any poorer quality data than interviews conducted in person (Novick, 2008).

Other forms of survey research were considered but eliminated for the reasons given here. Internet-based surveys benefit from a short timeframe for data collection, but they have a low to medium response rate (de Vaus, 2014) and the researcher cannot ask additional questions from the answers supplied. Postal questionnaires also suffer from the same impediment and depending on the research sample, the cost of sending a questionnaire, and a stamped address envelope to receive the reply would have made it an expensive option.
In selecting interviews as the research method, the researcher was confident that by asking the right questions they would be able to elicit information from participants of a sufficient and robust standard to meet the aims and objectives of this study. Namely, with the focus on child criminal exploitation in county lines in England and Wales, what are the challenges and controversies of dealing with a national problem at the local level.

The focus then turned to the design of the interview itself. Bryman (2016) identifies 12 major types of interview. Covered here are the three most common types of interview: structured, unstructured, and semi-structured (Robson & McCartan, 2016). As the name would suggest, the first of these is the least flexible but it is particularly useful where the researcher wishes to give every participant the same question in sequence and they, in turn, respond from a set range of answers. It is a method suited to quantitative research because of its validity and reliability. It is not suitable for the aims of this research. At the opposite end of the spectrum, unstructured interviews are the most flexible with the interviewer exercising discretion not only over the questions but in what order they are asked. Likened to a conversation (Burgess, 1984) they could produce a mass of extraneous and irrelevant data. In the semi-structured interview, respondents are free to divulge as much or little detail as they wish and equally important, the researcher has the opportunity to ask them to amplify their response(s) where necessary to elicit additional information (Gray, 2017). Rubin and Rubin (2005, p. vii) liken the qualitative interview to the wearing of night goggles “permitting us to see that which is not ordinarily on view and examine that which is looked at but seldom seen.” Researchers using this method therefore, are encouraged to explore interesting lines of enquiry in their research and to expect to be surprised by what they discover (Myers & Newman, 2007). Not only is it the favoured research method used by constructionists, but it is also the method most frequently employed by academics leading the contemporary research in this area (e.g., Coomber, Harding, Moyle, Pitts, Spicer & Windle). Therefore, to satisfy the aims of this research, semi-structured interviews were chosen as the most suitable means available to the researcher of exploring the experiences, understanding, and perspectives of practitioners working in the relevant field of enquiry (Rubin & Rubin, 2012).

4.3.4 Interview Schedules
The four research questions identified in section 4.2.1 were broken down into sub-questions relevant to the key themes contained in the parent question, recognising that when designing the questions, it should be axiomatic how they were derived (Ryan et al., 2007). The researcher should also have a clear notion of what they want from the interviews to ensure the questions can achieve this (Hagan, 2014). Thus, the questions were designed to illuminate the participants’ knowledge and/or experience of CCE in county lines.

The research questions were drafted with two distinct groups in mind. First, the questions for the key informants (their role is described at 4.3.7) differed slightly from the second group as much as the intention was to elicit knowledge from their respective research relevant to this study. For the second group, the practitioners, the questions sought insights into their practical knowledge of CCE and county lines. For more details on the research population see ‘sampling strategy’ at section 4.3.6.

Dr Leah Fox (First Supervisor) reviewed the questions, as did a consultant working in the field and they were amended in light of their feedback (for both interview schedules see Appendix B).

### 4.3.5 Ethics

Application to conduct the primary research in the manner described above was made to the university’s Faculty of Humanities and Social Sciences Ethics Committee on the 8th December 2020. Amongst other considerations such as data storage during and after the study, the application covered the main five ethical responsibilities towards participants. Namely, their participation was voluntary, for their consent to be informed consent, a commitment to no malfeasance from taking part, an obligation to protect their confidentiality and anonymity and a respect for their privacy (de Vaus, 2014).

This study does not involve vulnerable populations. All respondents are aged 18 years or over and professionally occupied in a role engaged in researching and/or dealing with CCE in county lines. To assist in making their decision on whether to participate in the research, potential respondents were sent an invitation letter, participation information sheet and consent form (see appendices C to E respectively). They were also sent a copy of the interview
schedule (see Appendix B). This served two purposes. Firstly, it ensured that potential participants had all the available information to make an informed decision and secondly, where consent was forthcoming, time to prepare their answers to the questions. By providing potential participants with all the relevant information, the research complied with the principles of giving informed consent as set out by the British Society of Criminology (2015). No pressure was applied to take part nor detriment to the invited participant, implied or actual, from declining the invitation. Their consent was voluntary and participants were informed they could withdraw their consent at any point before the analysis of the data.

The potential participants were then given time to consider the received information before forwarding completed consent forms so that an interview could be arranged.

All participants were given assurances that the interviews would be anonymised thereafter using a unique alphanumeric reference with their identity known solely to the researcher. This nomenclature was consistently applied throughout the study. In writing the research for the thesis, no names nor any material that could potentially identify the respondent has been included, that is unless the respondent had already given their consent to waive their anonymity, as in the case of the two key informants. This assurance did not stretch to include information already released and therefore, in the public domain.

The study received ethical approval on the 18th of January 2021, reference FHSS 2020-067.

4.3.6 Sampling Strategy

Sampling strategies introduce the research population to the reader and informs them how it was selected. Whilst CCE in county lines is a nascent issue and there are limited resources dedicated to tackling it, it would not have been practicable to interview every person in England and Wales that might have relevant knowledge. Sampling, therefore, provides the researcher with a method to ensure they get the best information available (Denscombe, 2014). It acknowledges that judgements are inevitably made based on fragmentary evidence (Robson & McCartan, 2016) and restricted to a group that has had a similar social experience (Biernacki & Waldorf, 1981). By interviewing several participants from the relevant agencies, it ensures that no one single voice dominates and allows the researcher to triangulate the
results adding greater validity to their findings (Rubin & Rubin, 2005). Triangulation is a means of cross-checking information using more than one research method or source of data to study social phenomena (Bryman, 2016).

The three types of sampling associated with this study are convenience sampling, purposive sampling, and snowball sampling. The first is a sample that is simply easily accessible for the researcher (Bryman, 2016). Purposive sampling involves the researcher selecting cases and participants relevant to the research questions posed (Bryman, 2016), and snowball sampling refers to where one respondent introduces the researcher to another whom they believe has relevant information and that second person then nominates another and so forth (Vogt, 2005). The two key informants were identified through purposive sampling. They were interviewed at the beginning of the primary research phase to not only accelerate the researcher’s learning and knowledge but in case amendments to the interview schedule were needed. The convenience sampling strategy included three participants from the pilot study who had previously indicated their willingness to contribute to the main study. Participants in the research were then asked to nominate and facilitate introductions to persons they knew with relevant experience and knowledge of the subject matter, especially in areas where the researcher had limited or no access (Snowball sampling).

### 4.3.7 Inclusion Criteria

Participants with academic knowledge of the subject matter, used as key informants, are a recognised means of enabling the researcher to obtain quality data quicker than were they to interview a larger number of respondents. Facilitating access into areas where the researcher has none, and/or interpreting findings or other information are other functions that make key informants extremely useful (Rieger, 2007, cited by Ritzer, 2013).

The other participants included those with practical knowledge of dealing with CCE and/or county lines. See 4.3.9 for a breakdown of the research population.

### 4.3.8 Sample Size
The saturation point, described as the point where nothing new emerges from the data, framed the sample size, rather than any consideration at the outset of what would make a suitable number for a doctoral thesis. The exact number of respondents was, therefore, determined by the richness of their data. In other words, it was the quality rather than the quantity that was the guiding principle. Studies have shown this number to be as low as 12 interviews in one research project (Guest et al., 2006). However, to publish a qualitative study involving the use of interviews, between 20 and 30 interviews would be the expected minimum (Warren, 2002), indicating there are absolute standards expected. The researcher sought to strike a balance between the requirement for sufficient sources with a need to not overcomplicate the process making deep analysis difficult (Onwuegbuzie & Collins, 2007). However, a smaller number of interviews can permit the researcher to adopt a more in-depth focus thereby becoming closer to the participants and able to develop more finely grained data (Crouch & McKenzie, 2006). As illustrated in the section on data analysis (4.3.10), it is important to keep the analysis achievable and this can only be done if the volume of data is manageable. Whatever a researcher decides to do, it is “a delicate balancing act” (Bryman, 2016, p.416) where the researcher is ultimately responsible and may need to justify their decision.

Interviews took place between March and December 2021. A total of 40 participants (n=40) were interviewed, drawn from the law-enforcement agencies, the police, NCA, ROCUs and Border Force (n=22) and local authorities, social services, violence reduction units, the legal profession, HM government departments, the third sector and consultants (n=16) responsible for responding to county lines and/or criminal exploitation throughout England and Wales. Details of the participants are in Table 4.3. Their geographic area of responsibility is also detailed identifying whether their responsibilities extended nationally (i.e., England and Wales), or locally/regionally working in an area exporting drugs through county lines or an area importing them. Any material that would help identify the participant is removed except for the Key Informants (n=2) who waived the option to remain anonymous. The researcher was also given permission to name St Giles Trust, a charity working with victims of CCE, but not to reveal the names of the participants.
Interviews typically lasted from 30 to 45 minutes but 12 ran over an hour. The two longest interviews were conducted with the *key informants*. They were among the first interviews conducted and more time was given to these interviews as one of the primary functions of a *key informant* is to accelerate the researcher’s learning and knowledge of a given subject. Their knowledge and insights, not only on CCE and county lines, but advice on conducting research interviews proved helpful when conducting subsequent interviews.

Participants were asked to give their permission for the interview to be recorded to enable the transcription of the interview record. The researcher also made notes during the interview of key statements to serve as a reminder of important points (Piko, 2014). The researcher was careful, however, to keep a neutral visage as any form of gesture or tone could influence how the respondent answered further questions (McNamara, 2009). Note-taking was used sparingly, recording the time and a brief description so that the researcher could find the content easily at a later stage. Whilst recognising that interviewing by this method would be more impersonal than face-to-face interviews, the use of a video link allowed the researcher to gauge non-verbal communication (NVC), thus negating one of the main criticisms of telephone interviews suggested by Opdenakker (2006). It, therefore, represented a practical solution supported by the knowledge that suggests there is no evidence such techniques produce poorer quality data (Novick, 2008).

### 4.3.9 Participants in the Research

**Key Informants (anonymity waived)**

<table>
<thead>
<tr>
<th>Name</th>
<th>Function</th>
</tr>
</thead>
<tbody>
<tr>
<td>Simon Harding</td>
<td>Professor of Criminology, University of West London and Director of the National Centre for Gang Research</td>
</tr>
<tr>
<td>Ross Coomber</td>
<td>Emeritus Professor of Criminology and Sociology, University of Liverpool</td>
</tr>
</tbody>
</table>

Other participants (anonymity preserved)
**Reference Key:** LE=Law enforcement; LA=Local Authority; SS=Social Services; VRU=Violence Reduction Unit; CON=Consultant; LGL=Legal profession; HMG=Her Majesty’s Government Department; VS=Third sector

**Area Key:** N=National; IA=Importing Area; EA=Exporting Area

<table>
<thead>
<tr>
<th>Reference</th>
<th>Area</th>
<th>Function</th>
</tr>
</thead>
<tbody>
<tr>
<td>LE1</td>
<td>IA</td>
<td>Inspector, Integrated Offender Management and Youth Offending Team</td>
</tr>
<tr>
<td>LE2</td>
<td>IA</td>
<td>Youth Offending Team</td>
</tr>
<tr>
<td>LE3</td>
<td>IA</td>
<td>High Harms Team</td>
</tr>
<tr>
<td>LE4</td>
<td>IA</td>
<td>Force lead on county lines</td>
</tr>
<tr>
<td>LE5</td>
<td>IA</td>
<td>Inspector Specialist Operations</td>
</tr>
<tr>
<td>LE6</td>
<td>N</td>
<td>NCLCC</td>
</tr>
<tr>
<td>LE7</td>
<td>IA</td>
<td>Head of Crime Prevention,</td>
</tr>
<tr>
<td>LE8</td>
<td>IA</td>
<td>Detective Inspector Intelligence Unit</td>
</tr>
<tr>
<td>LE9</td>
<td>IA</td>
<td>Detective Chief Inspector Missing Exploited and Trafficked Children Team, Integrated Offender Management and Youth Offending Team</td>
</tr>
<tr>
<td>LE10</td>
<td>N</td>
<td>Detective Superintendent, Covert Policing &amp; County Lines</td>
</tr>
<tr>
<td>LE11</td>
<td>EA</td>
<td>Detective Superintendent Crime Intelligence, Force Intelligence Bureau</td>
</tr>
<tr>
<td>LE12</td>
<td>IA</td>
<td>Detective Superintendent, County Lines Team</td>
</tr>
<tr>
<td>LE13</td>
<td>IA</td>
<td>Detective Sergeant, County Lines &amp; Gangs Team</td>
</tr>
<tr>
<td>Reference</td>
<td>Area</td>
<td>Function</td>
</tr>
<tr>
<td>-----------</td>
<td>------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>LE14</td>
<td>IA</td>
<td>Detective Superintendent Force lead on County Lines</td>
</tr>
<tr>
<td>LE15</td>
<td>IA</td>
<td>ROCU Coordinator</td>
</tr>
<tr>
<td>LE16</td>
<td>N</td>
<td>NCLCC</td>
</tr>
<tr>
<td>LE17</td>
<td>N</td>
<td>NCA Drugs expert</td>
</tr>
<tr>
<td>LE18</td>
<td>EA</td>
<td>Acting Detective Inspector on County Lines Team</td>
</tr>
<tr>
<td>LE19</td>
<td>N</td>
<td>NCLCC</td>
</tr>
<tr>
<td>LE20</td>
<td>N</td>
<td>Director of Intelligence</td>
</tr>
<tr>
<td>LE21</td>
<td>IA</td>
<td>ROCU Coordinator</td>
</tr>
<tr>
<td>LE22</td>
<td>EA</td>
<td>ROCU Coordinator</td>
</tr>
</tbody>
</table>

Non-law enforcement

<table>
<thead>
<tr>
<th>Reference</th>
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<tbody>
<tr>
<td>LA23</td>
<td>EA</td>
<td>County Lines Rescue and Response Ops Manager</td>
</tr>
<tr>
<td>LA24</td>
<td>EA</td>
<td>County Lines Rescue and Response Ops Manager</td>
</tr>
<tr>
<td>SS25</td>
<td>IA</td>
<td>YOT Specialist Services Team Manager</td>
</tr>
<tr>
<td>SS26</td>
<td>N</td>
<td>Social Services Subject Matter Expert</td>
</tr>
<tr>
<td>VRU27</td>
<td>EA</td>
<td>Social Services in Violence Reduction Unit</td>
</tr>
<tr>
<td>VRU28</td>
<td>EA</td>
<td>Social Services in Violence Reduction Unit</td>
</tr>
<tr>
<td>VRU29</td>
<td>EA</td>
<td>Social Services in Violence Reduction Unit</td>
</tr>
<tr>
<td>CON30</td>
<td>N</td>
<td>Consultant and trainer on county lines</td>
</tr>
</tbody>
</table>
### Participants in the research

<table>
<thead>
<tr>
<th>ID</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>CON31</td>
<td>Consultant and trainer on modern slavery and county lines</td>
</tr>
<tr>
<td>LGL32</td>
<td>CPS Senior Legal Policy Advisor</td>
</tr>
<tr>
<td>HMG33</td>
<td>Modern Slavery Policy Researcher</td>
</tr>
<tr>
<td>HMG34</td>
<td>Modern Slavery Policy Researcher</td>
</tr>
<tr>
<td>HMG35</td>
<td>Ministry of Justice-Prisons Estate</td>
</tr>
<tr>
<td>VS36</td>
<td>St. Giles Trust</td>
</tr>
<tr>
<td>VS37</td>
<td>St. Giles Trust</td>
</tr>
<tr>
<td>VS38</td>
<td>Human Trafficking Organisation</td>
</tr>
</tbody>
</table>

#### 4.3.10 Data Analysis

King and Wincup (2008) encourage researchers not to relegate data analysis to the end of the research stage but for it be a constant consideration throughout its lifespan. They emphasise the importance of two key questions to which all researchers should pay close attention, the reliability and validity of the research data. Reliability is about consistency, where it would be reasonably expected another researcher conducting the same study and using an identical research instrument would produce the same results. This is easier to understand in quantitative research where positivist traditions mean the researcher is a neutral observer, though other factors influence qualitative research such as the nexus between the subject of research and its researcher (Brannick & Coghlan, 2007). In this case, the researcher does not impartially observe but is inextricably linked to the knowledge they produce (Gray, 2017). This means that qualitative researchers should recognise that “the knowledge they produce reflects their location in time and social space” (Bryman, 2016, p.387). Therefore, whilst in broad terms it may be possible to replicate some of the results of qualitative research it is by no means a given. The term validity is used to refer to the extent to which the research
construct reflects the phenomenon conceptualised; put succinctly, it is “the truthfulness of the results” (King & Wincup, 2008, p.36). Whilst data can be obtained reliably it does not follow that it is valid, whereas conversely valid data can be said to be reliable.

King and Wincup (2008) identified four key rules for data analysis. Table 4.4 shows how these rules in the design of the data analysis are managed in this study.

<table>
<thead>
<tr>
<th>No.</th>
<th>Rule</th>
<th>How managed in this study</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rule No. 1</td>
<td>Never include questions you, as the researcher do not know how to analyse.</td>
<td>All questions were identified as subsets of the main research aims. It was expected that the received data would be rich with unique insights to answer those questions. A qualitative paradigm was chosen and the researcher is familiar with the analysis of this type of data.</td>
</tr>
<tr>
<td>Rule No. 2</td>
<td>Piloting the research instruments to test for reliability and validity will help smooth the movement from data collection to data analysis.</td>
<td>Questions were piloted and amended considering feedback received.</td>
</tr>
<tr>
<td>Rule No. 3</td>
<td>Keep the analysis simple—complex analysis can distort the data.</td>
<td>The data was analysed using the thematic model of Braun and Clarke (2006) to identify themes that assisted in answering the research questions.</td>
</tr>
<tr>
<td>Rule No. 4</td>
<td>Pursue the analysis “ruthlessly”, step-by-step. This is not a contradiction of Rule No. 3 but by adopting a step by step process the researcher is encouraged to pursue further questions posed by the initial analysis as far as the data will allow.</td>
<td>The process used is outlined in this section coupled with systematic data gathering, organisation, and analysis, aided by NVivo, a qualitative data analysis software package.</td>
</tr>
</tbody>
</table>

Table 4.4: Data analysis rules adapted from King and Wincup (2008)
Data analysis is also data reduction to clarify it for the researcher (Bryman, 2012). The use of software programmes for qualitative data analysis such as NVivo has revolutionised this process and brings greater credibility to research findings to eliminate the potential for researcher bias caused by their values, influences and prejudices, sometimes referred to as their ‘inattentional blindness’ (Most et al., 2001; 2005: Most, 2010). Whilst there are several methods used in data analysis, for example, content analysis, discourse analysis, and grounded theory as identified by Braun and Clarke (2006), thematic analysis was the model used.

Thematic analysis, identifying patterns and themes, was chosen because it allowed the researcher to remain theoretically flexible and to identify datasets and group these into themes and patterns that could then be cross-referenced to identify those that recur as well as latent meanings (Ryan & Bernard, 2000). Theoretical data analysis is used in various epistemological paradigms and is not as theoretically constrained as grounded theory, which seeks to impose a theory on the data (Braun & Clarke, 2006). However, it is not an identifiable technique (Bryman, 2016) meaning that despite its adoption as a method of data analysis there are no clear processes that illuminate how themes are identified and how they interrelate.

Braun and Clarke’s (2006) model involves a recursive process of six steps. The first is whereby the researcher familiarises themselves with the data. In this instance, the researcher conducted all the interviews as well as the literature search and the transcription of the interview data. Through reading and re-reading the texts and interview scripts, they became fully acquainted with the data. NVivo software (version 12.7.0) was used which allowed for the uploading of data from several sources, and the ability to create and codify passages of text which proved very useful in managing the large amount of data captured in the interviews. It also added transparency to the process. Secondly, the initial coding identified 44 themes and sub-themes. Thirdly, in the search for themes, the initial coding was reduced to 17 themes and sub-themes. These were further revised in steps four and five where 11 themes and sub-themes were identified and named under the main headings linked to the research objectives, namely, the identification and recording of CCE in county lines, its current response and opportunities for future policy and practice. All mind maps are reproduced in
Appendix G. The first two of these three headings were used to record the literature review findings to ensure complementarity of the structure of this thesis. The sixth and final step is to produce a report; this thesis serves that function. These sub-themes formed the key findings from this research presented in the three Findings and Discussion Chapters, Five to Seven.

4.4 Limitations of This Research

This exploratory study benefited from the enthusiastic disposition of academics and practitioners to engage with the research. No criminally exploited children and young persons or their exploiters were interviewed. This is a limitation, but serious ethical implications arise from asking vulnerable children to re-live painful and distressing experiences that may conflict with the ‘do no harm’ principles of sound ethical research as promoted by the British Society of Criminology (2015). Therefore, the decision was made to use illustrative cases from the extant literature. The children and young person’s stories are also heard through the words of the participants in this research who have direct contact with criminally exploited children and their exploiters.

The focus of this research is on CCE in county lines in England and Wales. The results should not be over-extended to be of relevance to other forms of child exploitation that exist or to other countries. The findings make no claim to be of relevance to practitioners working with criminally exploited adults. This is because responses to criminally exploited adults are subject to different statutory and legal frameworks (Hudek, 2018; Ford, 2018).

While it is important to acknowledge these limitations, they should not be interpreted as undermining or negating the study’s original contribution to knowledge and practice as detailed in Chapters Seven and Eight.

4.5 Summary of Chapter and Conclusion

Table 4.5 provides a useful summary and reminder of the methodology and methods adopted for this research.
This chapter summarises the research process adopted for this study. As such, its intention is to complete the reader’s understanding of not only what has been studied, but how it was done (Dunne et al., 2005). The chapter followed a logical sequence from identifying the research problem to be addressed, to the design and limitations of the research. The choice of research design resulted from calculated decision-making that recognises those limitations whilst pragmatically satisfying the research aims. This was particularly relevant as the primary research was conducted during the restrictions imposed during the Covid pandemic. The next three chapters discuss the research findings through the analyses of the empirical data gathered in this study.

Table 4.5: Summary of methodology and method(s)

<table>
<thead>
<tr>
<th>Framework</th>
<th>Ontology</th>
<th>Epistemology</th>
<th>Axial</th>
<th>Paradigm</th>
<th>Method</th>
<th>Data analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Model</td>
<td>Constructivist</td>
<td>Interpretivist</td>
<td>Value laden</td>
<td>Qualitative</td>
<td>Semi-structured interview</td>
<td>Thematic</td>
</tr>
</tbody>
</table>

adopted

This chapter summarises the research process adopted for this study. As such, its intention is to complete the reader’s understanding of not only what has been studied, but how it was done (Dunne et al., 2005). The chapter followed a logical sequence from identifying the research problem to be addressed, to the design and limitations of the research. The choice of research design resulted from calculated decision-making that recognises those limitations whilst pragmatically satisfying the research aims. This was particularly relevant as the primary research was conducted during the restrictions imposed during the Covid pandemic. The next three chapters discuss the research findings through the analyses of the empirical data gathered in this study.
Chapter Five: Findings and Discussion - Identification and Recording of Child Criminal Exploitation in County Lines

5.1 Introduction

Chapters Five to Seven detail the findings of the qualitative semi-structured interviews conducted as part of this research. This chapter covers the results of the research identifying the challenges and controversies relating to how child criminal exploitation in county lines in England and Wales is constructed and understood by the police and the relevant statutory and non-statutory agencies with whom they engage (RO1). Proposals for the response to the challenges and controversies identified here are to be found in Chapter Seven and in the recommendations for future policy and practice made in Chapter Eight.

The research findings are discussed under the following four headings.

- Finding One: The HM Government (2018a) definition needs updating to reflect the changes to county lines
- Finding Two: Practitioner understanding of CCE in county lines remains limited
- Finding Three: The term county lines masks the criminal exploitation of children
- Finding Four: There are no national standards applied in the recording of CCE in county lines

5.2 Finding One: The HM Government (2018a) Definition Needs Updating to Reflect the Changes to County Lines

The first finding of the research described here is that HM Government’s (2018a) definition of county lines meant to guide law enforcement and those with whom they work, does not reflect the current model. County lines has evolved considerably since it first emerged around 2012 when, for example, children from London were found in Margate, and the initial thought was that they acted-

*like an urban street gang morphing into an organised crime group, you know, and actually it's just the police's job, that would have been our view (VS36).*
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

For the police, originally the presence of children and young persons in importing areas that did not fit the profile of local children made it relatively easy for them to identify those involved as the following comment indicates.

*We have seen 14, 15, 16 year-olds sometimes 300 miles away from home in locations where they don’t have any contacts. They have been sent and have no understanding of the geography, the layout, the demographic and they are fishes out of water effectively, so, in that sense it has been quite easy for us to get successes.* (LE10)

Since their emergence, perpetrators of county lines have shown themselves to be resilient and adaptive to law enforcement efforts to contain them. Recognising that out-of-town dealers (OTD) were comparatively easy for the police to spot, perpetrators started to use local children and young persons who were less likely to attract the same police attention (LE7). As the comment below shows, this change came about as a direct consequence of the police becoming more knowledgeable of county lines.

*I think we then started to get a bit more wise to that and then, you know, so it started to lead to the recruitment of local kids who wouldn’t necessarily stand out because, you know, they live in the area. They just happened to be in the street.* (LE1)

The restrictions placed on travel and to stay at home, where possible, imposed by the government during the Covid pandemic further stimulated the recruitment of local children. Recognising that OTD would stand out even more among small numbers of travellers, the perpetrators responded to the pandemic by accelerating the use of local children as indicated in this response.

*There’s a kind of a trend that’s cropped up post-Covid 19 of maybe more localised drug dealing happening. So, more young people in London, potentially, not travelling so far to be exploited to sell drugs and potentially local people in the counties being recruited instead of sending young people out on public transport.* (LA23)

The use of local children, especially in the counties mentioned in the comment above, means that the dealers have become harder for the police to identify. A further development in the use of children and young persons in county lines has been of youths not previously known to the relevant statutory authorities, referred to here as ‘clean skins.’ This change challenges many of the preconceived ideas that only children in gangs and other children in the care system or excluded from school were recruited into county lines. The following comment
indicates why those not previously known to the statutory agencies are becoming increasingly used.

_We see a lot more clean skins coming into the system, young persons with no footprint with the support services. So, the reason we see that change dynamic, a little bit of a trend, is because obviously when you have a young person who's got a lot of support from services, there's a lot of eyes on that young person and sometimes these older people, all the people involved in this might go, you know what, we're going to step back from this young person because they're so many eyes on him._ (VS37)

The county lines exploiters recruit through the attraction and glamour of earning fast money. There is a lack of awareness among children and young persons of the reality of working a line, as indicated in the following response.

_I live in a village, and the drug dealers will approach schools, primary schools, secondary schools in order to try to utilise those what they call clean skins. The awareness around this subject is not great. You know, people have seen and heard about county lines but there's still a bit of glamour attached to it for young people._ (HMG35)

The recruitment of children and young persons from comparatively stable family backgrounds is also reflected in the growing awareness of the recruitment of girls in the model. This may not necessarily reveal a new development but a reflection of long-held gender bias in the role of women in crime (e.g., Newburn & Stanko, 1994) and their low representation in the number of arrests for all crime types in England and Wales, remaining at a constant 15 per cent since 2015/2016 (Ministry of Justice, 2020).

_96 per cent are male, but there is probably a lack of understanding about female involvement because when we have arrested females, half of them approximately have been carrying drugs and/or weapons. We’re working on the hypothesis [that] they see it as part of the game that they’re going to get turned over. But if they are with girls [they] will travel with girls more anonymously._ (LE10)

St Giles Trust commented on the growing number of girls referred to their services too, and like their male counterparts, not necessarily from the traditional recruitment grounds such as the PRUs and looked after children.
We are seeing more influx of girls coming in for us, which for us is very positive because people recognise that girls is [sic] now involved. Predominantly between the ages of 11 and 17, across the board, all from various backgrounds. (VS37)

These changes in the evolution of the county lines model are not represented in HM Government’s (2018a, p.48) definition, replicated below.

[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.

The definition firmly links county lines to involving gangs and organised criminal networks in moving controlled drugs into one or more area in the UK, described as an importing area. The research findings would suggest that this definition does not adequately describe the current county lines model. These words of a participant who works in a Rescue and Response programme highlight one implication of this finding, that unless a potential victim fits the criteria linked to the current definition of county lines, they are unlikely to get the support they need.

Unless you tick the county line box, that conversation probably will not continue with us. It tends to come down to your resources and capacity as to whether or not how you want to define your problem, because if you change that definition slightly, all of a sudden, you’re unable to deal with the vast amount of young people coming through the front door. So, I think it is helpful to have that flexibility, but obviously, then when it comes to looking at a problem on a national level, if everybody’s defining things differently, then it can be more problematic when making comparisons. (LA23)

This has consequences not only in terms of the identification of the phenomenon but also where resources are linked to this definition and strict interpretations of it used, responding agencies may fail to identify potentially exploited children and young persons. The consequences of this are that they do not recognise the need to provide adequate safeguarding, meaning that a child or young person is likely to remain vulnerable to continued exploitation. The literature also identified that the lack of agreed definitions makes it difficult to identify victims (Hudek, 2018; Barlow, 2019). However, this finding also highlights that where different organisations use strict and distinct definitions, any attempt to draw national
comparisons becomes much harder, if not impossible. The impact of this on data recording is discussed in Finding Four but as the comment below shows, this research identified support among the participants for HM Government to provide a clearer definition of county lines.

The Home Office definition is unhelpful as it’s about moving across boundaries as well as I think the title [is] unhelpful as well, county lines because people immediately assume that you’ve got to be moving outside of an area. It’s possible to have a county line exclusively in Cardiff for example so, I think the definition from the Home Office could do with some tweaking to send out the right message. (LE21)

The question of whether there should be a legal definition of CCE as recommended by HMICFRS (2020) split participants with not all in favour but there was widespread support for a nationally agreed and adopted description of what CCE in county lines is, as this comment illustrates.

We do need a definition, but what we also need is a description that is agreed by all of the stakeholders because at the moment, you've got a description that the police recognise, a different one that local authority recognise and then a different one again that education and health recognise. (HMG35)

The following comment also supports the case for a description in addition to a definition. The difference between a definition and a description is subtle, but what became evident through this research is that the government’s definition no longer adequately describes the current reality of county lines.

Definitions are helpful, but they can sometimes be overly constricting and too tightly ‘boundaried’ [sic]. So, I welcome a definition, but I also welcome a description because a description is more fluid, and it is more nuanced and can be utilised in different ways by different practitioners. So, as long as people are agreed on fundamental concepts, descriptions can vary. (Harding)

A danger of descriptions could be that if too ‘fluid’ they leave room for interpretation and as identified earlier, make national assessments and comparisons extremely difficult. As mentioned in Chapter Two, Coomber and Moyle (2018) and Windle et al. (2020) previously suggested that the term out-of-town dealers (OTD) better described those involved in county lines rather than gangs and organised criminal networks. This research finding, however, goes further in saying that the original definition of county lines no longer reflects the current
model, nor does the term OTD. Urgently required is a nationally agreed and adopted new definition, along with a description, otherwise where strict adherence to the current HM Government (2018a) definition persists, there is a high chance that potential victims and offenders will not be identified, nor will they be dealt with appropriately.

5.3 Finding Two: Practitioner Understanding of CCE in County Lines Remains Limited

This research found that in general, the understanding of CCE in county lines remains limited to only those working directly in the field, i.e., those in bespoke county lines or missing/exploited teams. The participants interviewed for this research formed part of teams working on county lines. Whilst they claimed to possess a good understanding and knowledge of CCE in county lines, they identified that outside of their teams, the level of understanding was at best partial. The response below from St Giles Trust who work with the police on CCE and county lines indicates that outside of those dedicated teams, where they exist, the understanding of the phenomenon is indeed low.

I work with county lines teams, and they seem pretty clued up but people in the same force in the same town, less so. If you get picked up by them, you’re more likely to get treated differently, so it’s so arbitrary. (VS36)

This has consequences for identifying and recording the phenomenon because invariably the first officer at a scene is not someone working in a dedicated county lines team. It can lead to varied outcomes for potential victims, and the perpetrators of CCE in county lines as indicated in this real-life example of attending officers not having sufficient knowledge of CCE in county lines to make the right judgement.

The wider policing family doesn’t get it. As an example, a 15-year-old, high-risk misper. Police arrived, didn’t understand the situation, so arrested the person who was rescuing the child and the child was let go. We had let that boy get on a train and go because [the] police on the street didn’t understand the situation. Thankfully, we were able to recover it quickly but there’s a mass of learning for the patrol officers. (LE13)

In the case above officers from that force’s county lines team were able to remedy the situation but that is not always possible. The following response indicates that in the area
where this participant works, they are trying to raise the understanding of all staff regardless of their function.

*If on a murder team, this is not your bread and butter. We’re trying to get a baseline for everyone. We want it to become the automatic question to ask are they a victim of exploitation for a child in the criminal justice system. They’re not holding a machete for no reason, they see violence every day and want to protect themselves.* (VRU29)

An important discovery in this research is how victims of CCE in county lines are often perceived. Juveniles who commit crime are regarded as:

“Scrotes and thugs, and shits who by the fact that they were dealing drugs meant that they are not really very nice people and not deserving of sympathy.” (Harding)

Traditional masculine culture in UK policing is a key factor impacting the approach taken towards young offenders and those exploited. This research uncovered evidence of victim blaming, especially by those not working on the type of dedicated teams mentioned earlier. The comment below suggests that culture persists, although it can be changed.

*The culture that kids are little shits still exists, but we can change that concept. They are invariably running from or to something.* (LE11)

Victim blaming places the responsibility on the child or young person for their actions as shown in the next comment. Whilst previous research identified children working of their volition (Robinson et al., 2019) and with a degree of personal agency (Moyle & Coomber, 2017), no child or young person can consent to be criminally exploited. The impact of grooming scandals such as Rochdale, Rotherham and more recently Telford, whilst linked to CSE rather than CCE, have all highlighted the need for reform, especially among the police.

*There’s still a culture that kids are little shits in some areas while in others they will get called out. [It’s] still bit of a battle. I hoped that after the Rochdale report everyone would stop victim blaming but that is not the case. The whole language all comes back to the onus is on the child to keep themselves safe.* (VRU29)

The evidence from this research suggests that to date those lessons have not been fully learnt, although this response gives some hope that at least in this officer’s force progress in changing the toxic masculine culture was being made.
The police are more aware of grooming. They still view kids as though they are a little shit, but in general policing is more aware that something happened for them to be there. A problem is many children don’t see themselves as victims, this is part of the grooming. (LE15)

It became evident in conducting this research that CCE in county lines is challenging many of the preconceived ideas and traditional policing activities in a novel way. The comment below whilst expressing understanding for the vulnerability of an exploited child highlights the difficulties in responding to the needs of that child.

No child wants to be 200 miles away from home in a strange environment supplying drugs. That is not an active choice when it is so dangerous. But if you interact with them and consider them to be a victim they might tell you to fuck off and spit in your face, that’s quite likely. In fact, they don’t recognise they’re vulnerable but I am really uncomfortable with the thought of a 16-year-old that is carrying a knife and crack cocaine, lots of cash, really wants to be in a strange town in the middle of the night. When you keep seeing the same child, it is prison or death as the only way out and it’s terrifying. (LE10)

Responding to children and young persons who present themselves as in the case above brings a unique set of challenges for the responding agencies. Dealing with an exploited child who does not wish to engage and is outwardly antagonistic cannot be easy, but as the participant above identifies, the aggression masks the vulnerability, that remains hidden behind tough exteriors (Windle et al., 2020). Despite the limited youth services’ resources identified earlier in this thesis, those responding are urged to see the behaviour of those unwilling to cooperate in a wider context (Ofsted, 2018). The next comment from a social worker develops this theme, and also highlights how it is not just the police who may view exploited children as complicit in their exploitation.

I think that children have very good reasons why they’re not telling us and why they’re giving us a no-comment interview is not necessarily resistance or bravado or an indication that they’re not willing to or that they’re not frightened, all of those things. But I still think I’ve heard, you know, and probably would still hear, despite a lot of our work is it’s just a simple PWITS [acronym for possession with intent to supply drugs]. Don’t you be confusing it with anything because they seem very confident, they know what they’re doing. They know what they’ve got themselves into. And I would say we still hear that today and not necessarily just from the police either you know, what I
have heard in strategy meetings, education, people saying that and, you know, sometimes social workers. So, I don't think we've cracked it. (SS26)

It is adduced from this research that low levels of understanding of CCE in county lines together with cultural issues have led to examples of victim blaming within the police and other responding agencies with no consensus among them on how to engage with exploited minors. The finding adds weight to the argument that there should be a national framework for all the relevant agencies that prescribes how to recognise and respond to CCE in county lines. The response is covered in more detail in Chapter Six, but the culture still exists in some quarters where criminally exploited children are seen as responsible for their actions.

Comparatively, there has been little research into the attitudes of police officers toward youth although factors such as gender, age, race, social class, training, workload and views of the youth criminal justice system can influence police and young person encounters (Sanborn & Salerno, 2005). Organisational factors too such as a department’s culture and beliefs are reflected in its policies, procedures, and practices and these influence an officer’s decisions and actions (Skogan & Frydl, 2004). Toxic masculinity in the police is blamed on the high concentration of men as serving officers (Wolfe-Robinson & Dodd, 2021) although in this research, both male and female respondents highlighted the problem of victim blaming and spoke encouragingly of attempts to eliminate it.

This finding suggests that despite the best efforts of those officers spoken to, there is still some way to go towards a more universal understanding of CCE in county lines. It is well illustrated in the following recent case. Carswell (2022), the Director of Specialist Policing Consultancy was asked in August 2022 to review a county lines’ case and provide an expert witness statement on a 15-year-old boy charged with drug trafficking offences. At the age of 14, he had been recruited by a London street gang to sell class A drugs. Within days of his recruitment, he was told he owed money to the gang: money he could not repay. As a result, both he and his family were threatened. The police were called and told of the situation but took no action to protect his family. The boy felt he had to carry on dealing for the gang. He was later stopped by the police and arrested for possession with intent to supply (PWITS). He again disclosed his exploitation. Again, this was not investigated despite the clear allegation. The boy was not treated as a victim, instead the police charged him with PWITS. Both the
police and the CPS who continued with the prosecution, in contravention of their guidelines, failed him. Following Carswell’s report, the CPS has withdrawn the charges but the case further illustrates that achieving a more universal understanding of CCE in county lines is necessary if the police and CPS in particular are to improve outcomes in this area.

Finding Two supports an Ofsted (2018) report that many frontline police officers need the training to identify a vulnerable child and that changing the culture is required to recognise that a child in possession of a weapon or Class A drugs is a child protection issue. At this time, the broader re-contextualisation of the shape and role of policing more generally, especially following the CSE scandals previously mentioned and the criticism the police received in its wake, should mean that the police have to approach things differently. This research identified that the knowledge and expertise remain limited to those working in specialist teams, when given the scale of this national problem it needs to become embedded across all the police and the responding agencies who come into contact with children and young persons. This finding has been recently echoed in the results of other research (see Calouri et al., 2022). As found here, CCE in county lines is a new challenge and not one that all police, in particular, are comfortable with despite the presence of a national strategy for child-centred policing (CCP) endorsed by the NPCC (2016), trauma-based training, and the creation of a National Vulnerability Action Plan (NVAP) (NPCC & College of Policing, 2018). Chapter Seven includes research findings for future practice, some of which would help address the limited practitioner understanding of CCE in county lines.

5.4 Finding Three: The Term County Lines Masks the Criminal Exploitation of Children

The participants were asked about their experience of dealing with CCE in county lines and the types of violence and trauma inflicted on its victims. Participants spoke of the escalating level of violence, blackmail, and coercion associated with county lines as well as the level of exploitation as outlined in the following quotation.

_We’re talking about people using military-grade knives like Rambo knives. Beating people with bicycle chains, torturing people with hot water and beating people with baseball bats, stripping them naked, sexually exploiting them. But what comes with_
all that is trauma, potential loss of life, serious injury and constantly looking over your shoulder. (LE14)

The following response indicates that the scale of the use of violence is growing and incidents becoming more serious.

It's about the culture that they're involved in and that the normalising of violence is really high level. I mean, we've had some really serious incidents happen of attempted stabbings, threatening with knives, stabbings, then you know, it's becoming, unfortunately, a bit commonplace it feels. (SS25)

Given the scale of the violence, blackmail, and coercion involved, it is perhaps surprising that the problem remains described under the term county lines rather than child criminal exploitation. The former masks the exploitation that is taking place. Not wishing to diminish the impact that drugs have on the lives of users and those associated with them, to some extent there is an element of choice whereas children cannot consent to be criminally exploited. Once trapped in this lifestyle, they are on a downward spiral that as participant LE10 identified earlier frequently results in “prison or death.” It is perhaps not surprising then that among the participants there was universal support for use of the term CCE rather than county lines as indicated in the following two comments.

It is not a new concept. I disagree with the name county lines because the misconception is that it goes on outside of your force area. County lines is drug dealing with exploitation and vulnerability in the business model. (LE11)

I prefer it to be CCE to county lines as it has [a] wider breadth. (LE22)

As the comment below shows, there is confusion between the terms CCE and county lines with drug dealing seen by many as the priority when the exploitation of children and young persons should be.

You mention CCE and they automatically think drug dealing, you know, he’s dealing. And we see that not just professionals like social services youth justice, we also see it with police as well. You know, they think, you know, dealing. People think CCE and county lines are the same but in all fairness, county lines and CCE are quite separate. CCE falls under county lines. County lines is the mobile phone to set up the line, CCE falls out of that. (VS37)
However, one of the barriers identified in this research to the wider adoption of the term CCE to describe the phenomenon is that the term is neither well understood nor widely adopted as this response shows.

_I don't think it is well understood and that surprises me. In actual fact, it's a phrasing that is relatively recent to the entirety of this kind of criminal justice world. It's not a phrase that I've heard up until I would say, three years ago, it just didn't exist. We maybe phrased it, thought about it or conceptualised it in different ways, but it's relatively recent to our lexicon. And that's surprising to me._ (Harding)

In the comment below the NCA admits that it does not use the term CCE but is urging the ROCUs to use it as a marker. There is a disconnect between the two positions of not using the term but encouraging others to and expressing disappointment that they have not universally adopted the term.

_CCE is not well understood; it's a relatively new phrase although forces do have a reasonable understanding of the criminal use of children. The NCA doesn’t really use the term CCE. We are trying to get forces through their ROCUs to put CCE on as a marker, but it doesn’t happen uniformly across the country._ (LE16)

The finding echoes that of Olver and Cockbain’s (2021) study involving 11 participants from the West Midlands policing area that using the term county lines obscures the exploitation involved and hinders the understanding of it for both practitioners who are unfamiliar with it and the general public. This research finding goes further than that of Olver and Cockbain (2021) however, by saying that not only does the term county lines mask the CCE, but that the term CCE must be widely adopted and recognised as the national standard; until it is, the phenomenon will continue to be framed as a drug issue rather than exploitation of the most vulnerable in society. The NCA should lead the way here but unfortunately, none of its relevant publications (e.g., 2019a, 2020, 2021) use the term CCE, despite encouraging others to use it.

The lack of a national strategy for CCE in country lines and the framing of county lines as a drug problem has led to the adoption of responses geared towards containing drug supply rather than the criminal exploitation of children. It is debatable how successful this drug control strategy has been given the size of the UK drugs market mentioned in Chapter Two but when it comes to child criminal exploitation, this aphorism appears appropriate, “fighting
a war with inappropriate strategies and/or weapons hardly ever guarantees winning it” (Polomarkakis, 2017, p.401). The war in this context is described as county lines, when in fact it should be containing and reducing child criminal exploitation.

The failure to adopt the term CCE has implications too for the last finding of this chapter, the recording of data.

5.5. Finding Four: There are No National Standards Applied in the Recording of CCE in County Lines

A further implication of the failure to adopt the term CCE nationally or to agree on a common nomenclature for the identification and recording of CCE in county lines means that data is recorded under different classifications. This makes data analysis difficult, if not unreliable as indicated in the following comment.

I was required to write a strategic assessment, some sort of number for London and that was challenging to get the data as the police do not record what’s happening in the same way. County lines is not a flag. Forces use different systems and there is no one single unit, so some record data under Mispers, gangs, safeguarding. (LA24)

Coomber in his interview highlighted how the myriad of different reporting systems and the taxonomy of labels used to describe the phenomenon when recording in a computer system add to an already fragmented national picture. This has implications for understanding the problem and also in trying to assess its scale and changes.

The presentation of it in every county, it's in every police force, it just provides, evokes a picture of county lines, which is a web that just covers the country. I’m not saying it doesn't. I’m just saying, I don't know that it does because the data isn't being transparent. I’m actually trying to get certain arrest figures from the NCA actually going back 10 years to try and map the development of county lines, but not all police forces record everything in the same way. Not everything recorded as county lines in one force is recorded as county lines in another. This is also true for exploitation. (Coomber)

Speaking with a participant from the NCLCC highlighted the difficulty they face in trying to produce reliable data on CCE and county lines. Given that county lines is a national threat (HM Government 2016: NCA, 2017), it is disappointing that no one, including the NCLCC, can
accurately paint the picture of that threat with any degree of certainty. The data is recorded under various themes, if it is recorded at all, as the participant’s comments below illustrate.

*I laugh because it is the bane of my life trying to extrapolate county lines-related data. There is no ADR, automatic data recovery. Some forces use flags, others not. A lot is a manual return, and I cannot always determine what is drugs from county lines drugs, and what is CCE in relation to county lines or shoplifting for example.* (LE19)

This finding is surprising due to the national tasking that exists for all police forces to report on county lines. Under Section 5(1) and (2) of the Crime and Courts Act 2013, the Director-General of the NCA has the legal authority to demand that a police force or other law-enforcement agency in the UK carry out a task if they consider that its performance would benefit the NCA. At the time of conducting this research, county lines is the only such tasking in place for the police forces in England and Wales. The tasking requires Chief Constables to submit reporting around county lines and requires them to conduct operational activity against the phenomenon. It would be reasonable to assume, therefore, that there would be some agreement on national standards given that forces are required to migrate their county lines data onto the Police National Database (PND) (NCLCC, 2021). Despite the presence of the tasking, it is not universally accepted and adopted across England and Wales as the following comment from the NCLCC highlights.

*I do not feel the forces would respond if they weren’t compelled to and there’s still not full compliance. This needs to be seen as business as usual and it isn’t which is why the tasking still remains.* (LE16)

The impact of this finding is that despite the rhetoric that CCE in county lines is a national problem, the non-compliance of some police forces with the tasking does not reflect that position. No other tasking mechanism exists for the other agencies either despite the legislation and policy framework mentioned in Chapter Three advocating and supporting multiagency responses.

Linked to the previous Finding (Three), the failure to record instances of child criminal exploitation as CCE, instead using several other descriptors such as “MISPERS, gangs Safeguarding” (LA24), makes it impossible to assess the true scale of the problem and
whether criminal exploitation has overtaken labour and sexual exploitation as claimed by the NCA (2020).

Finding Four represents a challenge for the responding agencies to ensure they adopt universal data recording standards to enable meaningful data analysis to understand the scale of CCE in county lines. Required are greater data uniformity and transparency to plot the size and scale of the problem and to allow academics, policymakers and practitioners alike to identify whether it is growing and if so where and in what manner, so that they can formulate targeted policy and practical responses. The inability still to understand fully the scale of this phenomenon, despite its emergence in the academic and grey literature at least seven years ago, is both a challenge and a controversy. It would benefit greatly from the universal adoption of national standards for the identification and reporting of CCE in county lines captured in a national CCE strategy.

5.6 Chapter Conclusion

This chapter identified several challenges and controversies related to the identification and recording of CCE in county lines. Although described as four separate findings, they are intertwined and collectively mean that by leaving the recording and identification of the phenomenon to the local level there is a wide variance in practice and this impacts on the potential outcomes for those involved, as discussed in Chapter Six.

This research found that the highlighting of gangs and other criminal networks in the definition of county lines does not reflect the current use of children who are non-gang affiliated, especially the use of local children who are ‘clean skins.’ Consequently, the definition of county lines is outdated and in need of urgent revision, not least because service provision often depends on meeting the thresholds linked to the use of the extant definition. In this case it is feared that victims are falling ‘through the cracks.’

Despite claims that the use of the term child criminal exploitation is more commonplace to define this type of exploitation involving children (HM Government, 2018a), the findings of this research suggest that it is a term infrequently used. Continuing to use the term county lines, or other descriptions in preference to CCE represents a key challenge to the
understanding and the response to the phenomenon. Guidance for practitioners advises that language such as drug running is replaced with the nomenclature, child criminal exploitation (The Children’s Society et al., n.d.), but it has not been adopted nationally across England and Wales. The failure to adopt the term CCE nationally, and the recording of the phenomenon under a taxonomy of different titles means that analysing trends, scale and whether the situation is worsening or improving, becomes difficult if not impossible. This research has shown that where no existing consensual definition of an issue exists, professionals will adopt approaches that differ widely, as also suggested by Anderson (2017).

Both The Children’s Commissioner (2019) and HMICFRS (2020) have called for CCE to be recognised as a national priority with the latter urging the Home Office to enshrine the definition in law by the end of 2020. This would help remedy some of the issues revealed within these research findings. To date, a law criminalising CCE has not made it onto the statute books. In its absence, the findings of Chapter Seven call for, among other findings, a national strategy for CCE in county lines: this is carried forward to the recommendations for future practice in Chapter Eight.

The next chapter examines the response to CCE in county lines. A fundamental challenge and controversy highlighted in the findings of this chapter is that by leaving the identification and recording of CCE in county lines to local interpretation, there is no common national standard or understanding of to what it is the statutory and non-statutory agencies are responding.
6.1 Introduction

Continuing from Chapter Five, this chapter discovers how the understanding of CCE in county lines influences and shapes how the police and agencies with whom they work respond to criminally exploited children (RO2) and identifies what challenges and controversies the current response represents to both the police, and the agencies with whom they work (RO3). Chapter Seven includes proposals for the response to the challenges and controversies identified in this chapter. When read in conjunction with the recommendations for future policy and practice made in Chapter Eight, they form the original contribution to policy and practice from this research.

The research findings are:-

- Finding Five: There are organisational and regional variances in practice in the response to CCE in county lines
- Finding Six: Use of the Modern Slavery Act 2015 is not making a significant difference
- Finding Seven: The numbers of safeguarded children are exaggerated
- Finding Eight: Short-term funding has a detrimental impact on the response

6.2 Finding Five: There are Organisational and Regional Variances in Practice in the Response to CCE in County Lines

This research uncovered widespread variance in practice among the responding agencies, both at an organisational and regional level. This finding is discussed under four separate headings that lay bare the varied practice in existence through looking at the participants’ comments on the NCLCC, data systems and regional variations. It begins with the organisational issues.
This research finding asserts that variance in practice at an organisational level is having a detrimental impact on the response to CCE in county lines. To support this claim, in the first of several comments, a participant from social services who works with the police commented on what they saw as a variance in practice at a national level and the threshold levels at which criminally exploited children can access services.

*I think we definitely see national variation in practice, both from Home Office forces and local authorities in that response. We see a difference in threshold decision-making.* (SS26)

One of the reasons for variation in practice highlighted above could be the primary purpose of an organisation with the police generally treating an exploited child as an offender whilst the local authority is more willing to see them as a victim first.

*There's definitely a clear difference in the police response to the local authority response, which the local authorities being much more likely to see that individual as a victim of exploitation, and the police probably more reluctantly willing to treat that person as a victim. And for me, that is one of the biggest challenges we face.* (LA23)

The response above from a participant working in Rescue and Response identifies what they perceived to be one of the biggest challenges faced when dealing with CCE in county lines, one of organisational cultural patrimony. The following excerpt also identifies a siloed structure unsuitable to deal with national issues such as this. The comments indicate that county lines is testing the current organisational structures and exposing that they are not adequate to deal with this modern-day phenomenon.

*County lines is a 21st-century problem and we're trying to fix it with 19th-century town hall structures that put everything into silos. So, we've got the health silo, the housing silo, we've got the youth services silo and then the youth offending silo and the police silo. And these silos have got, practically got, physical walls next to them. So, until all of this is changed up, we're going to really struggle. It's rearranging the chairs on the Titanic because it's not going away.* (Harding)

Siloed working within HM Government and within the same department in government also drew comment from this participant from social services.

*So, you've got the Home Office with their side, and we've got the Department for Education with their side from the serious case reviews from their side of things and*
The children’s side. So, I guess the potential different silos working within the Home Office obviously, you’ve got the modern slavery, you’ve got the exploitation, you’ve got the organised crime and the drug element, and so, again, I suspect a lot of silo working within those departments as well. (SS26)

The consequences of siloed working practices are that there is a lack of cohesion in the response to CCE in county lines. What this means in practice was spelt out by this social worker highlighting the potential to miss the risks that a vulnerable child might present to others.

The children's services lens will look at it very much about that child needs safeguarding and then will respond in that way. But what they might do if they work in a silo is miss that child does have potential risk issues towards others in the community. (SS25)

6.2.2 The National County Lines Coordination Centre (NCLCC)

In August 2018 the NCLCC was created as a partnership between the police and the NCA due to the difficulties experienced by law enforcement in tackling county lines as a drugs model that operates across force boundaries. The NCLCC is the only national structure in place focused on county lines.

The three exporting police forces of the MPS, Merseyside and West Midlands have all benefited from extra funding from the Home Office along with the BTP who’s parent organisation is the Ministry of Transport, which “don’t normally get Home Office funding unless something is a national issue” (LE10). As this participant from the NCLCC reports here, the importing forces can also bid for extra funding although the funding is not enough to fund all 43 police forces in England and Wales.

Historically, exporting forces were oblivious to the problem they were exporting and importing forces felt helpless to resolve. They are not equipped to deal with it as it is a big drain on their resource. We have Home Office funding of three key exporting areas. We have a reciprocal surge fund for the importing counties to respond but cannot fund 40 forces, but they can bid in for operational activity. (LE19)

In addition to NCA assessments, there are monthly tasking meetings chaired by the Home Office. The NCLCC collate all current intelligence and disseminate it to ROCUs (LE11).
Generally, law enforcement views the NCLCC as a positive development as the following comments indicate.

_I think as far as county lines we have a good grip of what is going on and we’re seeing a reduction in county lines._ (LE11)

_What’s good about NCLCC is there is a helicopter view. We can see where kids are going to and from and can escalate that niche capabilities through the NCA and ROCU to tap into. I can contact my equivalent in another area and get things done._ (LE22)

The NCLCC also supports the police forces through the use of deep-dive peer reviews. These include partner agencies, though led by the police who may request a review by writing to the NPCC lead who can then authorise it. They are an opportunity to “See what the force is good at and where they need assistance and share best practice” (LE19). The responsibility rests with the police force to request a peer review and there is no obligation for them to accept any of the findings or recommendations. It is nonetheless an example of the expanding role of the NCLCC.

However, the NCLCC recognises that despite their coordinating function, the structure of the policing landscape in England and Wales has a detrimental impact on their ability to share best practice and information as illustrated below.

_Forces should share best practice much better than they do at present. We’re hampered by boundaries. Young people cross borders but [the] police do not. There are too many forces in England and Wales. Information sharing is not there although [it is] better._ (LE6)

Not all respondents were convinced of the merits of the NCLCC. Criticism included that it is a ‘black hole’ for information indicating that it will need to do more to convince some police officers of its usefulness.

_We pump a lot in, but I don’t see what comes out. Sod all comes out. They just regurgitate the intel that we gave them._ (LE13)

St Giles Trust also highlighted what they saw as a missed opportunity for the NCLCC to perform a national coordination role for all partner agencies, not just the police.
And what I hoped it would be doing would be taking intel in and feeding briefings out. But if it feeds it out, it feeds it to the police. You know, it's a police-led initiative. And, you know, we'd hoped there would be stuff coming out for the likes of us that would be useful. (VS36)

The research findings suggest that despite an improving role for the NCLCC there is still some way to go to convince partners in the police of its merits. Furthermore, despite the involvement of partners in the peer-reviews and intensification weeks this research shows that the NCLCC will need to focus more attention on its relationship with partner agencies who currently still view it as an organisation “by the police, for the police” (VS37).

6.2.3 Data Systems

Adding to the siloed picture emerging from the response is the lack of a national data system and the absence of connectivity of local information systems. The following comment bemoans the lack of access to data systems even for personnel working within the same organisation as well as nervousness around data sharing between the partner agencies and understanding of the Data Protection Act 2018, the UK’s application of the General Data Protection Regulation (GDPR).

There are borders between police and other partners, multiagency data sharing is not inadequate but relies on a human to share that data. Ideally, we need a national system to connect many people. PND is not accessible to many, I don’t have it, operational cops don’t have it, not all the intel team so no quick sharing of information-so, we’re trying the PNC [Police National Computer] flag. I think the police share information, but it is not two-way with other agencies. There’s nervousness of data sharing with GDPR often blamed and non-integrated systems. (LE19)

A further issue identified in the sharing of data is that often those convicted of exploiting children and young persons are not identified as such when sent to prison or youth custody. Their involvement in an exploitative model remains hidden beneath a conviction for an offence under the Misuse of Drugs Act 1971 or Offences Against the Person Act 1861, as indicated by this respondent.

There are a lot of complex needs for these young people, and they don't come in for county lines, as you know, that's not an offence per se. So, they come in for drugs and violence and the fact that they have been involved in this exploitative business model
of county lines is often not highlighted. How that information gets to the secure state is a problem. (HMG35)

What this means is that across various areas of the response to CCE in county lines there are sizeable gaps in the sharing of data with partner agencies in a timely fashion and the lack of access to a national database. Wherever an exploiter or exploited person may be, their case history and their antecedents should be readily available to ensure that decisions on how best to respond are made with knowledge of the full facts. Access to a shared national database forms one of the recommendations in Chapter Eight.

Information sharing issues within organisations (e.g., not all police officers have access to PND), and nervousness caused by a lack of understanding of GDPR hinder outcomes. Urgently required are dynamic intelligence and data sharing agreements. A Government Agency Intelligence Network (GAIN) sits on the ROCU but their remit is organised criminals and many offenders may not reach this threshold plus, their focus is on the perpetrator rather than acting as a national system to identify and safeguard victims of exploitation. No participants mentioned the Tackling Organised Exploitation Programme (TOEX), possibly because it is new, but it aims to provide a more holistic approach to tackle organised exploitation. Whether those who criminally exploit children in county lines meet that threshold is unknown.

This finding echoes those of the Police Foundation Strategic Review of Policing (2022) which also identified reluctance to share data was often down to risk-averse attitudes toward the data protection laws. Their report also highlighted how outdated and unfit for purpose both the Police National Computer (PNC) and Police National Database (PND) are, lacking interoperability with other forces, let alone safeguarding partners. The recently enacted (April 2022) Police, Crime, Sentencing and Courts Act 2022 requires local authorities, police, and other specified agencies and health authorities to collaborate on evidence-based analyses of serious violence and linked problems, and to implement a strategy that will act as a national framework for data sharing. Whilst directed specifically at serious violence rather than tackling CCE in county lines, it might aid better information sharing. Placing the duty on a statutory footing, could lead to improved data sharing by clarifying the legal basis for information sharing, reducing the nervousness around GDPR mentioned earlier in this section.
6.2.4 Regional Variations

In addition to the impact of organisational structure on practice, this research also uncovered regional variations in practice, meaning that children and young persons are dealt with differently across England and Wales, as suggested in the following comment.

*Do you get dealt with differently or safeguarded? Definitely, in some regions of the country, the answer to that is almost certainly a resounding yes. I was talking to a DCI from [xxx] this morning and she said they’ve got 11 stand-alone local authorities and it’s like herding cats. They’ve all got their own practices and procedures, which are different so that’s within a single force area, a huge force. So is it being dealt with on a national perspective no, it needs to be. You know, a Birmingham boy found in Plymouth—what’s local there? Plymouth authorities and Birmingham authorities should absolutely be on the same page and they’re not. (LE10)*

This research also uncovered that some areas do not wish to acknowledge CCE in county lines meaning that exploited children are treated differently from one geographic region to another. The result is that criminally exploited children are not properly identified as the quote below illustrates.

*There are a couple of outliers who are still very resistant, and they will doggedly maintain they’ve got it sorted, whereas the evidence suggests that’s not the case or they are simply in denial. There are still some small places that just want to treat this as a criminal activity, and we just nick them and don’t really do anything else. We see people nicked down the road and it’s obviously exploitation. The same kid nicked out of the force area is treated completely differently. It is so arbitrary. (VS36)*

Notwithstanding the severe cuts to youth services (Black, 2020), a social worker interviewed identified that in their view there is a lack of cohesion in many areas. Economies of scale might be possible by the pooling of limited resources, but their remarks indicate this is not currently done.

*I have no desire to be critical of people that don't have the funding and resources to do their job. That’s not the idea. But it does seem to me that it's not particularly well knitted together really in a number of areas. (SS26)*

The disjointed, siloed and uncoordinated response as identified in the previous excerpts highlights the need for a uniform national response, offering the same level of service in one
area of England and Wales as another. Currently, this is not the case, often with a fragmented response within one policing area, served by several local authorities.

A participant from St Giles Trust makes the case below for a nationally agreed response to counter those areas that still deny they are experiencing CCE in county lines, either through a lack of knowledge or due to resourcing difficulties.

*I know it's quite tough to try to achieve, but there's got to be a system or a way where collectively we all can come together as one to really try and tackle this because other local authorities tackle it differently to everybody else. So, in terms of nationally, yeah, I think it's a problem because some areas are moving forward with this and some areas are like, well, we don't think there's a problem.* (VS37)

### 6.2.5 Finding Five Summary

What the findings of 6.2.1 to 6.2.4 inclusive have in common is that they identify that leaving the response to the local level means that exploited children and young persons are often at the mercy of the vagaries of the local system, understanding, priorities and resources. The need for a nationally agreed response, accepting that service delivery will be at the local level, as suggested by Pitts (2019) and Harding (2020) is the main theme emerging from this finding.

The organisational and regional variance in practice identified here echoes the findings of an earlier Ofsted (2018) inspection of children’s social care teams that criticised the apparent lack of professional curiosity to appreciate the needs and risks of MISPERS locally from other areas. The report blamed failures to recognise CCE resulting in vital information not being shared that would have helped and protected children.

What also emerges from Finding Five is a picture of continued silo working despite efforts made, such as by the NCLCC, to coordinate a response to county lines. Its critics however argue that it does not go far enough in supporting multiagency responses to CCE in county lines and that it is a body ‘run by the police, for the police’ (VS37). The responding agencies have already been warned of the dangers of working in isolation (e.g., Ofsted, 2018; Barlow, 2019; Mills & Unwin, 2020; Shaw & Greenhow, 2020; Pitts, 2021) but this research indicates that the warning has not been heeded.
Harding in his interview criticised the ‘town hall’ structures in place as inappropriate to deal with national phenomena such as CCE in county lines. The finding from this research that children and young persons who are subject to CCE experience a variety of responses resonates with The Children’s Society report blaming inconsistent safeguarding practices at a national and local level (Turner et al., 2019). Finding Five also echoes that of the Police Foundation report (2022, p.64) which identified a “Cluttered patchwork of partnership structures that requires rationalisation.” So too, this research’s finding that the identification and understanding of the exploitation of children and young persons varies considerably across geographical areas and within organisations supports previous findings from Hudek (2018) and the HASC (2019). It is disappointing that in the intervening years limited progress appears to have been made.

In summary of Finding Five, the absence of a coherent national multiagency strategy means that organisational and regional variations in practice continue to represent one of the key challenges and controversies in responding to CCE in county lines.

6.3 Finding Six: Use of The Modern Slavery Act 2015 is Not Making a Significant Difference

Whilst progress in the use of the Modern Slavery Act 2015 has been slow, likened to “turning the Titanic with a paddle” (LE6), under Op Orochi, the MPS claimed in an 18-month period to have shut between 460-470 lines through working in partnership with some of the police counties. They have achieved a 98 per cent conviction rate and over 80 per cent early guilty plea rate (LE18). However, when asked how effective the legislation had been in tackling CCE in county lines this participant replied-

I think that we probably haven’t done enough of it nationally to have to say one way or another, you know. (LE18)

The participant below, an ex-law enforcement officer and now consultant on human trafficking and county lines explains how low the level of understanding in the application of the Act is.

This is child criminal exploitation as opposed to just young criminals doing their thing but there is a massive lack of understanding that in itself is human trafficking, and I
find that frustrating. That lack of understanding is amongst everyone involved. There are some charities and academics who understand it and there are some exceptions, like St Giles Trust but generally, in my experience, I haven’t seen much evidence of professionals grasping what it is. (CON31)

The comment above highlights the apparent lack of understanding that the criminal exploitation of children is the key problem, not the supply of drugs, and supports the premise that it represents a form of human trafficking/modern slavery.

The CPS also confirmed the limited use of the Modern Slavery Act (MSA) 2015: only seven of the 43 police forces in England and Wales have used the Act to prosecute exploiters, due in their view, to the resource intensive investigation and prosecution, as conveyed here.

About 75 per cent of case referrals from the police come from only about seven police forces. Seven police force areas out of 43. And they will tend to be the larger areas because they are massively resource intensive. So, often, they take three years to actually sort of investigate and put together. They can completely swamp a small police force area. (LGL32)

The BTP also found that they have had to take on investigations for other forces concerned that if they did not the exploiter would go unpunished, and the victim left without adequate safeguarding as this respondent remarked.

We have investigated some of these modern slavery offences, but technically they are offences that are happening within a Home Office jurisdiction. So, the rights and wrongs of that, that sometimes we've done it because we worry that if we don't do it, nobody will. And, you know, that doesn't feel a very comfortable position. So, I know we've kept some investigations because of that view. The Home Office force didn't seem they were interested in pursuing it because the victim wasn't willing to support or make disclosures. (SS26)

The response above that the MSA 2015 has been used by less than 16 per cent (i.e., seven out of 43) of the available police forces in England and Wales highlights how unprepared the other forces are to pursue exploiters as human traffickers. Convictions remain low at only 331 in the rolling year October 2020 to September 2021 for all modern slavery offences, although higher than the previous year’s figure affected by court closures due to the Covid pandemic (Independent Anti-Slavery Commissioner, 2022). Across England and Wales there have been just over 60 prosecutions under the MSA 2015 linked to county lines in total.
(NCLCC, 2021). Given the scale of CCE in county lines, this figure is not particularly high and could be explained by the following reply when participants were asked why convictions remain low. The reason given implies that often pleas for drug offences are accepted in return for dropping the charges for modern slavery.

*One of the things we’re finding is actually quite difficult to get them right through to even prosecution. And if they’re pleading to a conspiracy or supply, the modern slavery element is getting dropped, whether that’s our evidence or whether that’s the whole criminal justice system and time and the whole decision-making processes CPS are [sic] taking about when to proceed with a trial or not to take a guilty plea on other charges. So, I personally think some national framework, a national response is needed.* (SS26)

What further compounds this picture are the remarks from the CPS below, indicating that often the penalty imposed by a judge under the Misuse of Drugs Act 1971 is higher than that provided for by the Modern Slavery Act 2015. Under the former, sentencing guidelines suggest that an offender over 18 who supplies drugs at or near schools or uses a person under 18 to deliver a controlled drug to another person are statutory aggravating factors (Sentencing Council, 2022).

*In virtually every case, even if the court has convicted on all offences, the sentencing tends to be sort of more serious for the Misuse of Drugs Act offences with a concurrent offence for the Modern Slavery Act offences.* (LGL32)

What the comment above illustrates is the mismatch between government and NCA promotion of the MSA 2015 with the practicalities of an independent judicial system. The situation is also adversely affected by the limited capacity of the criminal justice system to manage the cases. The following comment about the National Referral Mechanism (NRM) illustrates this point and whether it is likely a person is a victim of modern slavery (known as a conclusive grounds decision) and the backlogs caused by the Covid pandemic.

*There are more than 10,000 cases in the NRM awaiting a decision and there’s a deteriorating picture of more serious weapons and the NRM being misused. It looks like it’s about two years to wait for a conclusive grounds decision. And then if you look at that again, it’s the massive, massive backlogs that are at the moment as a result of Covid. And although we’ve got extended sittings and Nightingale courts, I think there’s something like almost 60,000 backlog of Crown Court cases awaiting trial.* Youth
courts obviously were youths who are involved in county lines offending, that’s even worse. (LGL32)

Given the comment above and the claim of one respondent that “the NRM is on its knees” (LE10) as well as the huge backlogs due to the pandemic, then it is surprising that the NCLCC still promotes its use in cases of CCE in county lines. It is axiomatic that if the system is already buckling under the weight of existing pressures, encouraging greater use of the Act will only exacerbate those pressures. In addition to the lengthy process mentioned earlier in this section, Covid has severely impacted the courts’ ability to process cases, although part of the delay is also due to the length of time it takes for a conclusive grounds decision. To further illustrate this latter point, the delays between an initial reasonable grounds and a conclusive grounds decision are reported to be on average 15 months in Q1 of 2022 (Calouri et al., 2022). Victims of CCE in county lines are being failed by the system intended to help protect them and until this is addressed more victims will be left waiting, unprotected and vulnerable to further exploitation.

In contrast to the study conducted by Olver and Cockbain (2021), therefore, this research did not find universal support for the continued use of the MSA 2015, nor the NRM. Instead, several respondents called for separate legislation, as shown here.

*The NRM is being used more and more for county lines and this is building in huge delays for all forms of trafficking. It needs separate legislation and court process for CCE as modern slavery but separate to [sic] unstable immigration status.* (VRU29)

The CPS also raised concerns that the exploiters misuse the NRM whilst at the same time providing nothing tangible in terms of benefits for the exploited child that wouldn’t be available under child protection legislation. In the following extract, they state that there are no tangible benefits for exploited children to go through the NRM as they are automatically entitled to certain service provision under the Children Act 1989.

*Section 48 of the Children’s Act already makes provision for them. And in fact, if they're referred through the NRM, they will be referred to the local authorities anyway for sort of the same in the same way that they would have been had they not been referred through the NRM.* (LGL32)
The same participant also argued that the use of the NRM in such cases is making children more attractive to the exploiters as they explain here.

"[it] has two consequences. One, it enables the many who go through the NRM to continue committing crime with impunity. And it is sort of I mean, there was an example of a case, I think it was last year, where they had already been identified by one police force area and the level of seriousness of the offending was just escalating. Each time they were picked up, referred to the NRM instead of being arrested and then released, then they'd go to another part of the country. But at least now, I know he's in custody for murder. But that's how far it's got to. Had another intervention been available other than just the NRM, then it may not have escalated to the same extent. But I think more worrying, and it is sort of what I'm telling the government, is that it also acts as a pull factor for more serious criminals to recruit kids and, you know, for whatever means, whether that's coercion or force or it has sort of in inducing them to commit crimes on the basis that they will not be criminalised." (LGL32)

An intended consequence of the NRM is not to raise the likelihood of a child being exploited but from these comments, this is the reality. Despite the ambition to promote the use of the Modern Slavery Act 2015 as a means to deal more effectively with those who criminally exploit children, this research highlights significant factors that demand a rethink of this policy. At only 16 per cent, this research has shown that few police forces have used the legislation. This means that it is yet to be seen as an effective tool to combat CCE in county lines. The blame for the low uptake could lie with the fact that conviction rates are low and the courts’ ability to deal with prosecutions under the Act is hindered, in part through the backlog created by Covid but also through the number of cases awaiting a conclusive grounds decision through the NRM. This research also discovered that in the case of criminally exploited children the NRM brings no tangible benefit other than support for an S45 defence. This finding resonates with that which suggests the delays incumbent with the use of the NRM leaves children waiting for an effective resolution when at their most vulnerable (Calouri et al., 2022). Instead, the statutory authorities including the CPS could make the conclusive grounds decision as they have access to the same material. A pilot scheme of local NRM decision-making may provide a better service and was recommended in an earlier report (Calouri et al., 2020). There are just ten pilot sites in total: seven pilot sites in England, two in Wales and one in Scotland (HM Government, 2022). It was not mentioned by any of the participants in this research possibly due to its ‘newness’ and its results are still awaited.
The results of earlier research found that the MSA 2015 was yet to lead to significant improvements in the police’s response (HMICFRS, 2017). This research indicates that the situation has not improved: in fact, over the five years since the publication of their report it has significantly worsened. The conclusion drawn from this research when viewed in tandem with other research (e.g., HMICFRS, 2017, 2020; Turner et al.; 2019; NSPCC, 2020) is that the Modern Slavery Act 2015 is not the right legislation to deal with CCE in county lines. If the ambition is to place a stain on a perpetrator’s image through use of the Act (Spicer, 2019a; Harding, 2020) and thereby make the criminal exploitation of children less desirable, then it has consistently failed. Finding Eleven in Chapter Seven makes the case for new bespoke legislation to tackle CCE in county lines.

6.4 Finding Seven: The Numbers of Safeguarded Children are Exaggerated

Throughout the year periodic coordinated activity across the police forces in England and Wales takes place in so-called intensification weeks. They represent the most visible part of a national response to tackling county lines and were discussed in Chapter Three. The NCLCC argues that such activity is important to showcase the pursue element for central government for confidence in policing as well as confidence in the community around county lines (LE6).

The weeks are an opportunity for the police to work collaboratively with partner agencies but as this comment from VRU29 indicates they are manpower intensive and not sustainable the whole year through.

*It stimulates phenomenal networks and relationships and motivates. All arrests and safeguarding reports are sent to me and are shared with the local authority exploitation leads so they are up to date with the previous day’s activities to ensure no one falls through the gaps. They want it every day of the year, not just in the intensification period but capacity and funding means it cannot be done. Sharing of info on arrests and safeguarding in a timely manner is something that needs to be done every day of the year for all forms of exploitation.* (VRU29)

What this comment highlights is the need for sharing the reports daily and not only during an intensification week but this is unsustainable with current resources. Ideally, the sharing of such information with partner agencies should not only occur three or four times a year during a police crackdown period but regularly. That would represent a better response.
The literature on the use of such crackdown operations, such as intensification weeks, described them as a form of symbolic policing (Coomber et al., 2017) as covered in Chapter Three. They were critiqued by some of the respondents to this research for only arresting the lower levels of the drug dealers and exploiters, the so-called ‘low hanging fruit’ as the following two comments indicate.

*A lot of the dealers who are nicked are not the middle or upper tier, they are the street level people and they are replaced within 24 hours. And if a line is shut down, it’s open again in 24 hours. And in that level, in that way, there is a revolving door which makes the utility of policing those almost negligible. You know, it’s unfortunate, but that’s just the way it is.* (Harding)

*They’re coming into the secure estate, and I would say a lot of them are low-hanging fruit. You know, they’re not really the real instigators, so it’s not having an effect because they are immediately replaced.* (HMG35)

Alongside the claims of large numbers of arrests, the intensification weeks also result in claims of large numbers of children safeguarded. When questioned as to what safeguarding means in this context, the following replies paint a different picture in the experience of these participants.

*We haven’t got a clue because these are often happening in areas where we are delivering the county line support service for those victims, and we have not had one referral. So, what have they done? I think they’ve filled a form in.* (VS36)

*A police officer going into a school and delivering an assembly to 250 children and then putting down that 250 children have been safeguarded. How can you evidence they have been safeguarded, you just spoke at them for 45 minutes.* (VRU27)

This over-exaggeration of the numbers safeguarded as a result of such crackdown operations is symptomatic of a wider misuse of the term contextual safeguarding as a social worker states here.

*So, what you often find, you’ll hear the term contextual safeguarding and we’re doing contextual safeguarding. And when you dig under the surface a bit of a glossy brochure. You can’t actually see, well, what real difference it is making other than that they’ve got a strategy or something like that because, again, it requires quite a lot of investment and effort from a number of organisations and a different way of working that you’ve got to have good coordination around. And if you haven’t got somebody*
This finding resonates with that of previous research where out of 1500 reportedly safeguarded during an intensification week in 2019, only 69 NRM referrals were made, i.e., less than five per cent (Calouri et al., 2020). This may be because, as this research found, there is no consensus nor a national standard defining what counts as safeguarding. This finding highlights again that without a national framework to define safeguarding standards, wide variance in practice and, in some cases, continued exaggerated claims will prevail. It is surprising that given the importance placed on safeguarding, no national strategy exists for extra-familial harm, a finding that accords with that of Firmin et al. (2019). The results of this research add renewed urgency to calls for a defined national standard, universally adopted in England and Wales.

6.5 Finding Eight: Short-Term Funding Has a Detrimental Impact on the Response

This finding from the research highlights the impact of the short-term nature of the funding made available to tackle CCE in county lines and the detrimental impact it has on the ability of the responding organisations to recruit and retain staff.

The following three extracts from the interviews illustrate this point and the ability of organisations to recruit and retain staff meaning that often they leave for more secure opportunities creating a vacancy that takes time to fill. The responses came from law enforcement, VRU staff and social workers, indicating a commonality in the finding. This first response illustrates the impracticalities of a one-year contract and the time taken to constantly recruit replacement staff.

*People start to leave in January if there's no confirmation they've got jobs from April quite understandably. A bit more of a longer-term funding cycle is just common sense. You know, the reality is it takes time to recruit, to get things going and start. We're really talking six months of effective work, which is not the best use of public money. Whereas if you have three years, you know, you get better candidates as well. Short-term contractors aren't good quality because a lot of people can't afford to take a risk on a year's contract.* (SS26)
The following response highlights how impactful the loss of staff can be when working in a small team.

*It’s damaging to service delivery having funding decisions made so late. In [xxx] we lost two-thirds of the workforce of a team of six. We had to close cases and transfer people to other services. This also causes damage to reputation when trying to establish credibility. Sometimes, we only discover in February or March that we’re ok for funding for the first of April.* (VS36)

As highlighted above, often funding is not available until the second quarter of the financial year, leaving little time to execute the activity for which the money was originally awarded as this response also shows.

*You’re due to get the money in March but from my experience before you hear it’s June, July. You’ve then got quarter one reporting when you haven’t done anything. We haven’t had the money to do anything, and you get six months to deliver and then the last part you’re busy reporting what you’ve been doing.* (LE4)

The next comment illustrates that whilst staff may wish to stay, without the security of a longer-term contract they are unlikely to. This has implications for the relevant services to attract quality staff and secure their commitment.

*It’s a nightmare. We have got people who want to carry on but are not told if they have a job so leave a resourcing gap. We need consistency, longevity. In the next spending review, a three-year commitment would help. It’s a very large frustration and difficult attracting the right people when there’s no guarantee of a job six months down the line.* (LE19)

Furthermore, the short-term nature of the funding and a lack of clarity on whether the funding would be approved does not allow the responding agencies to deal with criminally exploited children adequately as this response shows.

*It’s the short-term nature of it. And the difficulty is really making inroads when you don’t have that long-term security of funding.* (SS25)

Others in law enforcement shared this viewpoint, who whilst grateful for Home Office funding, complained that-

*It’s always cliff-edge funding, year on year. To get partners involved and sustainability and longevity, we need to be able to plan and fund for the future.* (LE11)
Often, the issues are complex and require dedicated time and resourcing, which the short-term nature of the current arrangements does not support as outlined by this respondent.

*I think it needs to be sitting around a table with the same people that are talking about CSE, the same people that are talking about gang violence, substance misuse. And it needs to be a long-term plan. You know, the public health approach model needs to be 10, 20 years. And it’s kind of the fundamental issue here that nothing’s ever really funded or thought about at that kind of scale, yet they still want a solution to the problem.* (LA23)

The response above does not single out CCE in county lines but promotes a more holistic and long-term approach to help solve these societal issues. If there are no quick-fix solutions to CCE in county lines (Harding, 2020) then the planned response has to be for the medium to longer term. Constantly changing staff and/or the withdrawal of services is not conducive to resolving the complex needs of exploited children. The complaints about short-term funding were ubiquitous across all services. They are of sufficient concern to be included as one of the key challenges and controversies identified when dealing with CCE in county lines.

The solution according to the following comments is to have a national framework with services mirrored from one area to another. This would also help to resolve the organisational and regional variance in practice identified in Finding Five.

*You have got to have some national drive around this. You’ve got to make sure that the government are [sic] investing well in youth services.* (LE1)

The following comment also presses for similar structures across England and Wales to ensure uniform practices that ensure safeguarding are in place nationally.

*Not enough funding, enough support to get those organisations in at a national level. That is what we need. Rescue and Response exist in London and recently piloting it in West Midlands. It should be in every force area, on the same system and all joined up to avoid missing arrests for county lines offences and then lack of safeguarding when released from custody.* (VRU28)

The impact of this finding is illustrated not only in the inability of the responding services to plan for the medium to long term but also that despite growing awareness and understanding of CCE in county lines, opportunities to move from a reactive response to the prevention of further victims are not pursued sufficiently as shown in the following two comments.
We’re not necessarily identifying the next generation of young people that might be the ones to be exploited in years to come. So, it does feel a bit like we’re placing a plaster over the wound of county lines exploitation and we’re managing that, you know, we managed to deal with those numbers coming through the door. I think that now that we’ll have three years’ worth of data that’s very specific to this cohort of young people that have been exploited. I really think that now is the time to start thinking how we can use that information to more proactively safeguard against vulnerable children that [sic] might be the next ones to be exploited. (LA23)

The response suggests that with the opportunities afforded by more secure funding and resources the data collected by various agencies could be used to identify and adopt preventative strategies rather than focusing solely on responding to those already exploited. The following comment also makes the case for earlier intervention but highlights the need for time, something that short-term funding does not permit.

We need to be trying to get involved in those young people at an earlier stage. And we need better parenting provision that is around crime prevention specifically. But also, we need to be in schools because the links between proper structured education and schools, is really a significant link. So, I think if we were having a prevention, we need to build in a bit more time to do that. (SS25)

It is perhaps interesting that whilst youth services have seen significant cuts, these were not the main area of concern for the participants. Instead, their comments centred on the short-term nature of funding and its impact on their ability to plan strategies, engage partners and be more proactive. This finding echoes concerns raised by HMICFRS (2021) when inspecting the ROCUs. It found that the complexity and short-term nature of their funding had a significant detrimental effect on how they operated the business leads and in particular, the difficulties it exposed for staff who face uncertainty about the tenure of their posts. This resulted in ROCUs struggling to attract and retain staff based on fixed-term arrangements. The inspection described it as neither effective nor efficient and called on the Home Office, NPCC and APCC to provide long-term clarity and certainty to their financial position for the identification of a sustainable funding model. There are clear parallels to draw with the short-term nature of funding for all agencies engaged in tackling CCE in county lines and safeguarding vulnerable children and young persons.

6.6 Chapter Conclusion
This chapter identified several challenges and controversies related to the response to CCE in county lines. Though detailed under four findings, collectively they suggest that leaving the response to local, rather than a national framework has led to inconsistencies in practice and the level of service that victims receive. Perpetrators too are treated differently from one geographical area to another and, often, within the same organisation. Additionally, the application of the Modern Slavery Act 2015 has been beset with problems of backlogs caused by the Covid pandemic as well as the time it takes for a conclusive grounds decision through the NRM. The numbers of children who are safeguarded are often exaggerated, especially when linked to the so-called intensification weeks creating a false impression that it is both easy for the responding services to identify those in need of safeguarding as well as the capacity of those agencies to effectively safeguard large numbers of children at the same time. There is a pressing need for an honest dialogue on this subject with parents, guardians and communities. This theme is explored in the next chapter. Lastly, this research identified the detrimental impact of short-term funding has on the ability of the responding organisations to provide a quality service, recruit and retain the right staff and to make best use of the available data to do more to prevent children from becoming victims of criminal exploitation in county lines.

The impact of these findings when viewed alongside those of the previous chapter on the identification and recording of CCE in county lines show that despite a growing awareness of the phenomenon and the best efforts of those involved in dealing with CCE in county lines, the response is not uniform, effective nor delivering adequate safeguarding for victims, or sufficiently punishing their exploiters. Something different is called for and that is examined in the next chapter. Chapter Seven, the final Findings and Discussion chapter, examines the implications for future policy and practice in identifying and dealing with child criminal exploitation in county lines (RO4).
Chapter Seven: Findings and Discussion - A National Response

7.1 Introduction

The previous two chapters highlighted several controversies and challenges in identifying and dealing with CCE in county lines at the local level. This chapter offers solutions to those challenges and controversies through the inclusion of the participants’ views on what is missing from the current response and what the implications for future policy and practice would be when identifying and dealing with child criminal exploitation in county lines (RO4).

The research findings are discussed under the following headings.

- Finding Nine: Why a national strategy is required
- Finding Ten: CCE in county lines as a community issue, not just a policing problem
- Finding Eleven: There is a need to make it harder to exploit children and young persons
- Finding Twelve: Children and young persons must be engaged in the solution

7.2 Finding Nine: Why a National Strategy is Required

Many participants saw the absence of a national strategy to tackle CCE in county lines as harming the ability of agencies to provide a coherent and coordinated response. The following comment highlights that despite existing strategies for drugs and CSE, for example, there is no commensurate national framework for CCE. Consequently, it does not receive the attention or the resources that it requires.

*I get passionate that this is still not a national objective for this country. Drugs are by far the most serious driver of serious violence and homicide, and our networks exploit our children and vulnerable people, and they do harm to our communities. The cost to our society is estimated at £19.2 billion and yet it is still not a national strategy. We have a national strategy for CSE, why not CCE? County lines is a lucrative business model. The children are at the bottom of the pyramid of control.* (VRU27)

A national strategy could define the standards for all agencies to work at the local level to ensure parity across England and Wales so that those on the frontline know what to expect from each other no matter where located as this comment suggests:-
For me to work effectively with Norfolk, I have to have a system in place which is pretty much the same as the one I would have to have in Avon & Somerset, for example. So actually, there does need to be a single approach. Maybe it would make life a lot easier if we had one national sort of police, but then again, I feel that way, probably a lot about policing generally. (LE18)

The response above also highlights how the current policing structure of 43 police forces plus the BTP contributes to the lack of cohesion in a uniform response to this national problem. What exists in its place is oversight from organisations such as the College of Policing whose role is to ensure some standardisation of processes across the police forces of England and Wales through the use of Authorised Professional Practice (APP), the official and most up-to-date source of policing practice (College of Policing, 2022). A check of the college’s website (conducted July 2022) revealed a range of themes from armed policing to stop and search but no obvious mention of CCE, nor county lines as indicated below.

We haven’t got an APP for county lines, a helpful white paper guidance or legislation. What is it we want to do? How do we want to tackle it? There is research that we can tap into, practitioners we can tap into, VRUs, but I think we need that commonality and say this is a national priority, a national issue and this is what we need and what we are going to do. (LE22)

The following comment from a social worker supports the need for consistency at the national level to identify the best response to criminally exploited children regardless of whether they see themselves as a victim. As they say here, children cannot give their consent to be exploited. This respondent felt that a national framework advising how to respond to CCE in county lines would be of benefit.

The reality is that they’re children who can’t consent to their own exploitation, quite rightly. And on that basis, what can be done to keep them safe? What's the best system and the best response? Otherwise, we’re into kind of attributing responsibility or saying they’re to blame in some way. It would be helpful to have that more national-driven framework, how are we going to work with these children and young people? (SS26)

In summary, there was a broad consensus among participants for a national strategy to drive the response to CCE in county lines but this is missing, as is support to drive that strategy
forward, “it needs some real life and support, doesn’t it? Really, we need a vociferous MP” (SS26).

The national strategy should cover the elements identified in Findings Ten to Thirteen that follow. This is not an exhaustive list but reflects the key themes that emerged from this research. The first obligation would be to ensure there is a collective obligation among the statutory and non-statutory bodies as well as the community to provide a response to CCE in county lines, rather than seeing it primarily as a policing issue to resolve.

7.3 Finding Ten: CCE in County Lines as a Community Issue Not Just a Policing Problem

7.3.1 Partnership Working

Finding Three highlighted that the term county lines masks the criminal exploitation of children. The framing of county lines as a drug distribution model first and foremost meant that the criminal exploitation of children and vulnerable adults remains obscured. The research findings show that this places the responsibility for dealing with the problem firmly on the shoulders of law enforcement agencies. It is perhaps, therefore, unsurprising that at present the only national coordinating body is the NCLCC housed within the NCA and the ROCUs. However, CCE in county lines is a national problem (HM Government 2016; NCA, 2017), not a problem that is the responsibility of the police to provide an effective response as stated below.

I think in terms of what’s missing the position of everything being a police problem—we cannot arrest the way out of it—in terms of the gap, the focus is on it being a crime issue rather than the mechanisms that bring children into that system in the first place and I don’t think this is a police issue. (LE15)

This social worker argued that whilst in their view the police with whom they worked had a good understanding of the problem, often, they felt compelled to act on behalf of partner agencies.

I think the police actually understand it. The frustration isn’t now with the police if you like. They don’t necessarily want to arrest and lock up young kids per se. They get this whole exploitation thing, but they’re having to do things to get people off the street
order to protect them and sometimes, arrest is the only way to do that, and they can’t rely on social workers. (SS26)

The comment above echoes a previous finding where police in one area recognising a child had been criminally exploited found that the lack of an adequate response from other agencies meant they resorted to innovative tactics to cover the failure of the partners to safeguard the child. According to an Ofsted (2018) report, other agencies in the partnership had not been curious enough about this group of children and had failed to share or analyse intelligence they had about highly vulnerable minors that would have helped them to see patterns of exploitation. Not only did they not recognise and respond to the risks to local children, but they failed to safeguard adequately those victims of trafficking and at risk of CCE who had come into the area.

Whilst the law enforcement officers included in this research felt that they were on an upward trajectory in terms of how they were responding to CCE in county lines, frustration with partner agencies was also expressed despite recognising that funding cuts are in part responsible as this participant states.

I think [XXX] police step up to the plate, but, you know, if all statutory partners stood up to the plate we wouldn’t be in this position. I would say it is quite complex to say what the actual reasons are for it, and I’ll say it is multi-layered as well. I think resource cuts in services had a massive impact. Yeah, but, you know, it’s also the communities across the country. They have to step up to the plate and just realise that statutory partners, police and the government cannot deal with all these issues. They have got a level of responsibility within themselves to stand up and to be counted as well. (LE14)

The comment above also highlights there is scope for greater community engagement. One of the key informants shared this view, expressing that CCE in county lines is still regarded largely as a policing problem.

It has to be policed effectively. When I say policing, I don’t just mean the police. I mean society. I mean the partnership, etc. And it worries me. It concerns me that this is seen as an issue for the police rather than for everybody else. It will only be solved through partnership. In fact, it may not be solved at all. But if anybody’s going to have anything effectively done on it, it has to be done through partnerships and they never, ever talk about that. They only ever articulate this to uniformed policing. And that is wrong. And it conveys the wrong message, and it overemphasises enforcement, whereas there are
many other things that are equally, if not better, at dealing with this than enforcement kicking down the doors for the BBC, Sky News and so, you know. Excuse me, there are things that work, can work far more effectively. (Harding)

Harding’s comment on the prioritisation of enforcement responses are also linked to Finding Seven and the media coverage surrounding intensification weeks and other such crackdown operations. The NCLCC too, in the comment below, identify that CCE in county lines is a shared responsibility, in a similar manner to how the terrorism response and public campaigns such as the See it, Say it, Sort it have engaged the wider public in staying safe and reporting suspicious activity.

It needs to find its place within society where criminal exploitation is everyone’s responsibility. Unless we collaborate with local authorities, public health, education and law enforcement all combined. Unless we collaborate on the children we’re dealing with whether a victim or not, how do you know whether they are vulnerable and that’s one of the biggest challenges we have at the moment. So, it’s just changing those hearts and minds I see as one of the biggest challenges. (LE6)

These comments suggest that despite the statutory obligations under the Children Act 2004 covered in Chapter Three and Section 6 of the Crime and Disorder Act (CDA) 1998, the recognition of CCE in county lines as a shared responsibility is not working to full effect. The CDA 1998 places a statutory duty on the responsible authorities, referred to collectively as a community safety partnership, to collectively write and implement strategies to tackle crime and disorder in their area: it remains on the statute books but is not used to tackle CCE or county lines. Harding indicated that one of the reasons for this is that a Labour Government introduced the legislation and that the current Conservative Government is replacing the Act rather than capitalising on extant legislation, as he states here.

I have a 25-year career in community safety and that is all over partnership working. So, I know that the only way to solve these things is through partnership working. It’s the one good thing, I think, that came out of the Blair administration back in 1998, the Crime and Disorder Act, that refocusing around partnerships was absolutely critical. It’s still there in the legislature, and I can sense the government and in London, the Mayor and other people trying to kind of re-inflate it. And we have some of that trying to be re-inflated with the new Bill, the Police and Crime Bill, but it’s already still in place.
This research discovered that despite the rhetoric and the ambition, there is scope to develop further multiagency working and community engagement, using existing legislation to tackle this phenomenon. To stimulate this activity, colocation featured dominantly in the response to the question of how to promote shared responsibility. In some areas, this already occurs but there is no standard model. This respondent sees a multiagency hub as necessary to deliver better outcomes.

*We have monthly meetings on missing/trafficked persons, develop strategic plans and appoint policy leads from the agencies represented, but we need a multiagency hub delivering on a day-to-day basis. We do a monthly risk assessment, but we need to be sitting in the same room with others on a daily basis.* (LE9)

This finding identified that CCE in county lines is a community issue, not simply a policing problem. How to engage communities better is discussed in the next section as Finding Eleven. Finding Three identified that framing the issue as county lines masks the exploitation of children and young persons. The formation of the NCLCC in 2018 has furthered this dialogue rather than making the case for the problem to be viewed as a wider societal problem requiring a collaborative response. This research identified that unfortunately until this occurs, the government and others will continue to look to law enforcement for solutions. This last comment in this section argues for a national coordinator, not from the police and not driven by the NCLCC, to lead the way to shared responsibility.

*It needs someone at the front. The police is not going to bring together all the local authorities, NHS, etc. and other partners despite being the only organisation with a national coordinating structure.* (LE19)

### 7.3.2 Improving Community Awareness of CCE in County Lines

This research revealed a picture of a low level of awareness of CCE in county lines among the communities across England and Wales possibly linked to the framing of CCE in the county lines more as a drug dealing issue than criminal exploitation of children (as identified in Finding Three). The comment below highlights how this respondent and his peers view drug dealers pitched against fellow drug dealers as inconsequential to those who exist outside of the drug dealing milieu.
Friends who are not PCs don’t see it. It’s a hidden crime, druggies dealing with druggies, especially the stabbings. Friends don’t believe it’s happening, it’s not their world. (LE9)

The comment below highlights another reason why communities remain unengaged. It builds on the previous comment and shows that any child is vulnerable to exploitation, not just those from deprived or disadvantaged backgrounds, originally the favoured recruiting ground for the exploiters.

It's not talked about because maybe it's not in the mainstream media or it doesn’t, or people perceive that it doesn’t, affect the middle classes. But I think is going on quite a lot, and it's something that, you know, we talk about it as professionals but is it recognised amongst communities or is it something that people don't really want to talk about? (LE14)

This research identified that preconceptions persist at the community level that it is only those in the drug scene who are affected by CCE in county lines. But as highlighted here by this respondent working in a Violence Reduction Unit, every child is vulnerable, especially as exploiters are able to connect with potential victims through the use of social media and messaging Apps.

Every child under 18 is vulnerable, but what enhances the vulnerability is the ACEs - puts them at risk, but every child can be vulnerable to exploitation due to the internet. Due to these devices [showing a mobile phone]. The content on Apps e.g., TikTok, Twitter, Instagram-where abusers will target children-whether deprived or affluent backgrounds and that is not being shared with our society. ITV and BBC news when they talk about county lines, they talk about kids who come from neglect or domestic abuse or from deprived areas-what about any child that lives in affluent areas who have even more access to the internet? In [xxx] we have more children at risk or entrenched in exploitation from affluent backgrounds and this is not getting out nationally. It’s a glass house. ‘it won’t happen to my kid because I work full time.’ It could happen to any child because of the internet. (VRU27)

The participant’s comments show that it is the children from stable families living in affluent areas that can be just as vulnerable to exploitation since in many cases the exploiters have switched to ‘clean skins’ as identified in Finding One. The words of this participant below illustrate how children are exploited under the watch of their parent(s) or guardian(s).
We've had a young chap in [xxx], 15 years old, young white lad, red hair who’s a runner for county lines. Comes from a not even middle-class, I’d say an upper middle-class family, and they were completely unaware that their child was involved in it, and they just thought he had met new friends and he wanted to associate with them. The mum’s picking him up from home and taking him to meet his new friends. She felt embarrassed when he got arrested. She was mortified because she said she realised that he had a phone with him. He was leaving the house at different times during the day, but she didn’t know what he was doing and when she challenged him on it, he would say to her, have you got a problem with my new friends? Obviously, she didn’t want to offend her child, so she stuck with it. (LE14)

The responses above suggest that parents need educating to recognise their offspring is being criminally exploited, but as the following response suggests, many are not engaged enough in their children’s lives outside of the family home to know what their children are doing.

We spend a lot of time educating kids but zero time educating parents. I would love to tell them how it is. Some have parents who are present but they are absent working and providing for the family but don’t know what is going on. Do you have any idea what you are up against? The people you are going up against, they are good. (LE13)

Social media makes it easier to target children within the relative safety of their homes. The sites are not mandated to block messages from exploiters in this area in the same way as they are for CSE. The Online Safety Bill (Department for Digital, Culture, Media and Sport, 2022), at the time of writing delayed due to the election of a new Prime Minister, does not mention CCE. However, the response below also suggests that the exploiters do not need to try too hard to recruit children and young persons who, in some cases, approach the exploiters.

One of the groups that I speak with is a group of lived experience, and they will say regularly, we don’t approach kids, we’re not grooming and targeting kids. Kids are approaching us and saying, yeah, I’ll do it. I’ll often say, how do you recruit? Is it social media? And they would say, we don’t have to recruit and they come to us. So that’s why I say it’s the messaging at a young age that we need to get to because there is the still the kind of glamorisation of this because it’s still seen as the respect, the money the goods all of that, that there’s, you know, there’s an apprenticeship to it. But it’s only when they really get involved and then they’re in debt that’s when they suddenly go, oh, what a mistake to make. (HMG35)

A survey commissioned by the Children’s Society of 2000 parents, foster parents and legal guardians found that 84 per cent of parents and carers are worried about children being
exploited to sell drugs in their local area. The survey identified a miasma of knowledge with 40 per cent claiming not to have heard of the term CCE. It shows the need to raise awareness about CCE, with parents, children and the wider public in addition to professionals, according to Mark Russell, Chief Executive at the Children’s Society (Eichler, 2021).

One of the challenges involved in raising community awareness is the difficulty in reaching into communities that are accustomed to high levels of crime. As highlighted here through a campaign run in Merseyside that gives practical advice on recognising the signs (Eyes Open, 2021).

Communities impacted by it are tolerant of crime. We try to get them to understand through an Eyes Open booklet to raise awareness. There is a slight increase in public knowledge locally but not nationally. (LE11)

Whilst the campaign seeks to increase the level of knowledge and understanding of CCE, the gains are local, not national. There is no equivalent of the See it, Say it, Sort it campaign seen on public transport for the national response to terrorism.

Harding articulates the consequences of not conveying a similar message for CCE in county lines at a national level below, using a market town in Oxfordshire to illustrate the point and raise concerns about the likely consequences if communities remain unengaged in the response.

We must communicate and engage with communities. This idea that it's happening somewhere else, is a fantasy and a fallacy. It's happening everywhere. And the one Middle England town I would point to is Banbury. Banbury has become a hotspot of cuckooed properties, stabbings, fights, all kinds of nonsense that I'm sure the local community are just aghast at. Because it's a pivotal point for the distribution of drugs. So, it's county line central now. And it's that kind of Ye Olde England locality that is facing these issues. So, I can't imagine what it must be like to live in a place like that, because it's kind of like Downton Abbey meets Game of Thrones. You know, it's a shock for local people because of what's happened. But they need to be told. You cannot pull a veil over people's eyes, pretend it's not happening or we're better than they are in that town because it's not happening here. But it's happening over there. So, community engagement is absolutely critical because even in the most deprived communities, community engagement is not happening anymore. And community engagement is a central plank of community safety. It was all about involving
everybody. And when you have good community engagement, you have a better understanding. (Harding)

Educating and involving communities is key to building a national response to this phenomenon. Needed is some honest messaging, but, as the response below highlights, it would require the government to admit to the failings of the current response.

The message is we’re losing, and we need your help. You know, that’s really what our message should be politically. It’s a bit of a kind of suicide tablet, you know, just for them to publicly admit that. But that’s where it needs to go. Because, you know, another problem [is] that the work that I do is around parents and the parental understanding of this is really, really flawed. This is young black lives from broken families, so I don’t need to be worried about that. That’s the perception. I think you know, educating them on some of the signs and signals and behaviours to look out for will be very easy in a public message. But it’s not done. So, parents see a young person stabbed, and they want to hear ‘linked to gangs.’ And then they go, but that’s not my Johnny or Sally. People think it’s happening to other people. We need the message that here is a young person, A style grades, mum and dad at home, they’re linked into it because they’ve been actively targeted. You know that I think it’s those sort of messages, but they’re difficult messages because the government will go, we don’t want people worrying about it because they’ll be saying, so what are you going to do about it? (HMG35)

This finding shows the need for the engagement of parents/guardians and communities in understanding CCE in county lines. The low level of engagement has possibly originated from the framing of the issue as a drug problem under the title of county lines rather than CCE, a term that as previously stated is not well known among parents, children and the wider public. There are some uncomfortable messages to be conveyed if the reality of CCE is to be more accurately portrayed but this should not deter us from finding solutions to this societal problem. The Police Foundation’s recent report (2022) stated that the police are a part of a public safety system and that there should be a broad social response to crime, not just a policing response. Finding Ten encourages greater engagement and information sharing with the public, who despite some limited efforts such as the Eyes-Open campaign (2021) to stop criminal exploitation in Merseyside have largely been left out of the discussion.
7.4 Finding Eleven: There is a Need to Make it Harder to Exploit Children and Young Persons

Finding Six of this research showed that efforts to protect children from criminal exploitation using the Modern Slavery Act (MSA) 2015 are not currently delivering the number of successful prosecutions expected. If the intention of the government and others in promoting the use of the Act is to add a stain on the reputation of the exploiter, then this research has shown that not to be the case. A more specific Act should be considered that better safeguards children and young persons from exploitation and increases the sanctions for those that criminally exploit them to make it not less, but wholly undesirable. The following comment suggests that naming and shaming those who exploit children could be one option but the police would only be able to do this for convicted perpetrators and as the participant says, as those exploiters do not get their hands dirty finding the evidence to convict them would not be easy.

I want to go to the press and call them out. The criminals don’t want to get their hands dirty. They want the notoriety of being a big criminal, but they want to use exploitable, expendable people to be on the receiving end of police tactics. (LE11)

In response to the question of what was needed to reduce the criminal exploitation of children and young persons, the responses centred around two key themes. Firstly, attempting to classify exploiters as human traffickers under the MSA 2015 has not produced the intended consequence of making CCE less attractive to exploiters. Secondly, bespoke legislation is required that changes how the public, media and the criminal justice system see the exploiters. Dealing with the former first, the following comment is indicative of those that felt the current legislation failed to act as a disincentive for the exploiters. It argues that the use of children should be an aggravating factor that automatically adds to a sentence.

We need proper legislation. Modern Slavery is not fit for purpose. We have to investigate without victim testimony. Legislation that says if you run a drug enterprise and as a result of that, you use a child under 18 you are culpable and that is an aggravating factor and we are going to add to your sentence. There is no disincentive otherwise. It’s all about the money for them. They are wasting an entire generation of people. The kids have no chance. They are expert manipulators. (LE13)
This research identified almost universal support for the introduction of new legislation directly linked to CCE. This is in contrast to the research conducted in the West Midlands by Olver and Cockbain (2021). Bespoke legislation to tackle CCE rather than relying on existing legislation that, according to this participant is not fit for purpose.

*I think we need that commonality and say this is a national priority, a national issue and this is what we need this is what we are going to do. Drug threat groups are always on the agenda, but we want is government advice, legislation. Trafficking offences are hard to prove so get released. A bigger conversation is needed, more joined up legislation for what we want to do rather than bastardise what we have.* (LE22)

The response below was by far the most enthusiastic advocate for new legislation: it is included because it articulates what so many of the respondents said. It emphasises that if new legislation is introduced, then it needs to promote a thorough understanding within the criminal justice system of what CCE is and to make it as undesirable an offence to commit as practicable.

*100% let’s get it done now. Get it in. The understanding of human trafficking is flawed-it does not involve foreign travel. The number of successful prosecutions is dismal. So, if we’re going to create an offence of exploitation, we need to ensure it adds quality and we make our criminal justice system respect and understand what CCE is. We currently don’t have that with the Modern Slavery Act (VRU27)*

Building on this theme of making CCE as socially unacceptable as CSE, several participants supported the labelling of exploiters as ‘child abusers.’ Such a move would, in the view of these participants, act as a deterrent in a way that a conviction under the MSA 2015 has not. The following response illustrates that whilst there is no predicative offence of sexual exploitation, sex offenders are seen as abusers, unlike criminal exploiters who are often convicted for drug offences as identified in Finding Six.

*We can’t charge criminal exploitation like we can’t charge sexual exploitation, but we label them paedophiles, sexual abuse. We arrest under the Sexual Offences Act and that’s dirty they go to prison and don’t have a very nice time—that’s what the public perception is. For criminal exploitation, they’re Gucci drug dealers, driving beautiful cars, designer clothes. Any drug dealer who makes a 13-year-old child insert crack cocaine into their anus or vagina is a sex abuser. Any perpetrator who forces a child*
to take drugs from A to B is a child abuser and we do not reflect that in the language we use. (VRU27)

Stop and Prevent Adolescent Criminal Exploitation [SPACE] (2021) argue that the problem is not viewed through the lens of the potential fatality should the drugs burst internally or as CSE despite the Department for Education definition stating that there does not need to be physical contact from exploiters. They argue that social media police accounts are plentiful with images of plastic Kinder egg toy containers, coupled with flippant references to ‘Kinder egg surprises’ in arrests of children. A further indication of entrenched victim blaming and that the police see this drug dealing by children as a lifestyle choice.

The NSPCC (2020) has previously described the phenomenon as child abuse, a term normally associated with child sexual exploitation (CSE). The reply below also stresses the need to change the public’s perception of the exploiters of children. Making the public more aware of CCE through sharing real-life stories is one suggestion.

Make the public aware. Tell them the truth, share stories. We need to get CCE in legislation. Once labelled a nonce, they will soon drop it. It’s a label no criminal would want. Our legislation is old and dated, not fit for 2021 and the impact on local communities. (LE11)

A change in the nomenclature used by the media would also help make the criminal exploitation of children and young persons in county lines less attractive to their exploiters.

We need the media to stop calling them gang lords and call them child abusers. It has to change when we tell society what we have done. (VRU29)

The following comment also supports that child criminal exploiters are child abusers and there should be harsher penalties and more restrictions placed on perpetrators to protect criminally exploited children.

I’m desperate to get this looked [at] as child abuse and put controls around offenders. We change the status potentially, put them in a different prison add 5, 6, 7 years to the sentence and then you’re in a situation where it’s not so cool to be a mid-tier drug dealer (LE10)

A conviction under the legislation brings with it the opportunity to impose associated civil Orders such as Slavery Trafficking Prevention Orders and Slavery Trafficking Risk Orders on a
A convicted person once they leave prison, placing restrictions on their personal life as the following response covers.

You come out of custodial, out of custody with an Order that says you can’t go near children because you’ve been convicted. Now, that’s quite a powerful thing and you can’t associate in this particular area you can’t have two mobile phones. If we use those licences and Orders better, that could be, you know, from a secure estate. That’s a bit shutting the door after the horse has bolted, but that would be really effective, and they’re really poorly used at the moment. (HMG35)

Compounding this emerging picture of the unsuitability of using modern slavery legislation is what happens to exploiters convicted under the Act once they enter the prison estate. The following comment suggests that despite a conviction for human trafficking, offenders are still dealt with as having committed a drug offence. If the legislation is to be effective then it needs to be part of an end-to-end solution, as this is where current responses consistently fail. If the exploiters are labelled as ‘child abusers,’ then this would need to be consistent throughout their punishment, i.e., when they enter the secure estate too. The words from this participant suggest that is currently not the case with modern slavery.

You know that even if they’re convicted of modern slavery, and they come in, the reception is still as a drug dealer, not as a child exploiter. And only so it just doesn’t quite work really like that in prison. And so, I think really, when you look at how the county line business model is growing all over the UK, we should be thinking, you know, so, what’s the most appropriate piece of legislation for that? And I have to say something that looks at criminal exploitation and I think it would be quite helpful. (HMG35)

HMICFRS (2020) called for child criminal exploitation to be enshrined in legislation by the end of 2020. To date, that has not happened. This research has shown widespread support for bespoke CCE legislation that labels exploiters, ‘child abusers.’ This is a term also coined by the NSPCC (2020). What is also needed is legislation that not only increases the sanctions for those who criminally exploit children but ensures that when convicted they enter the secure estate as an exploiter, rather than hide behind being a drug dealer. It is only through the consistent application of national legislation and practice that means no matter where you commit the offence in England and Wales your treatment is the same, can change be effected.
The sanctions would be the same and if robustly applied, could make the criminal exploitation of children less attractive to criminals.

### 7.5 Finding Twelve: Children and Young Persons Must be Engaged in the Solution

The Introduction Chapter highlighted the case of Jake and Jaden, both criminally exploited through county lines to sell and move drugs. The subsequent Serious Case Reviews (SCRs) identified a series of failings but a common denominator was the inability of the responding agencies to recognise the need for and provide adequate safeguarding to prevent their continued exploitation with tragic consequences. These words from a social worker express frustration with the apparent lack of progress since those cases.

> We've had about how many SCRs just reading some of the London ones recently saying how many more? And they're all saying similar things in terms of recommendations. Actually, the whole national panel is saying we do need to do something systemically that is different. But it's frustrating the pace with which it doesn't seem to be a particular focus given the delay. I know that a working group is being formed to talk about that national panel recommendations, but when is that going to start? (SS26)

A report by the Child Safeguarding Practice Review Panel (2020) found that those who required state protection from criminal exploitation did not always get the help they needed and made recommendations for how services could be improved to work more effectively, respond quicker and more flexibly. It also found gaps in strategic understanding and practice at the local level.

Training in ACEs in response to scandals such as Rotherham, Rotherhithe and Telford and the introduction of new policing models to respond better to vulnerable persons such as child centred policing previously mentioned, are changing how the police, in particular, identify and understand CCE in county lines. However, this research identified that an important element of the training that is missing is listening to the experience of children caught up in CCE. It is an important oversight as commented upon here.

> We work to make our officers a little more trauma aware of ACEs within the family home, inter or extra familial harm. We can then understand the push and pull factors
within CCE. I believe our officers are doing everything they possibly can but there is a huge gap in their education, awareness, and training. Exploitation in relation to victims’ voices is not a mandatory training module for any Special Constable or PC within any force up and down the country. When I brought in a survivor to train police, there was good feedback. So many of my children were failed by the police, social, own family, education, because those professionals did not see the wider vulnerability wrapped around that child’s behaviour. (VRU27)

This next response also adds strength to the importance of involving the voices of children and young persons who have experienced exploitation as well as those that have been exploiters.

The voices of the young people who have gone through that experience are key. The people making the decisions have never experienced what goes on, never spoken to a young person or gone through the same experience so how can they put something in place? The voices of young people need to be part of that experience, both victims and perpetrators. (VRU28)

Finding Two showed that, in some cases, victim blaming still exists, because selling and distributing drugs such as heroin and crack cocaine meant that the victims were not really very nice people and undeserving of sympathy. Harding, who has spent time with gangs and gang-affiliated children as part of his research, encourages a rethink on how society views such children, as he states here.

They’re quite often good kids doing bad things and that they’re doing bad things because of this particular way the world works either in the gang or drug dealing. So, they’re being used. They don’t know they’re being used. They don’t think they’re being used. They don’t see they’re being used, but they’re being used because somebody older, wiser, smarter, more experienced, more thuggish or more controlling is using them in a particular way. (Harding)

In particular, his comments add weight to those above that engaging with children as part of the training of frontline staff would help improve the understanding of CCE in county lines and help find answers that to date have eluded policymakers, academics, and practitioners alike on how best to respond to the phenomenon. Reproduced below are Harding’s further comments in support of this argument.
We've got to stop pathologising young people and looking at them as a thug, bunch of ne'er do wells and scrotes and thinking they're ruined. We can't do anything with them. We've got to start thinking more productively. I sometimes lecture on this and finish with the statement, saying we have to find solutions with young people, not solutions to young people. And, you know, for me that conveys it all. You know, it's so important to do that. They've got a lot of the answers. (Harding)

Practitioners working in the field should adopt a children first, offenders second (CFOS) philosophy as a system of positive youth justice enabling both a child-friendly and a child-appropriate system that enables children to access and actualise their rights (Haines & Case, 2015). The scandals mentioned on page 20, indicate that in the context of CSE this is still not the case with victim blaming a recurrent theme identified in both enquiries (Jay, 2014: Crowther, 2022). The title 'offender' is a label that according to Labelling Theory leads to a self-fulfilling prophecy (Becker 1963) and the focus hitherto has been to place the responsibility on the child first, rather than interpreting their actions as part of a wider social or government responsibility. Promoting a childhood removed from the criminal justice system and encouraging their active participation, inclusion and engagement and prioritising the best interests of children is at the heart of a child first strategy (Youth Justice Board, 2022).

This research identified that victims of criminal exploitation do not form part of the current training landscape. The comments from Harding supplemented with those from other participants suggest there would be benefit in including their voices in the training. Moreover, the experiences of children either as exploited victims or as exploiters would be of immense benefit when framing responses to a phenomenon that quite clearly, from the evidence provided, needs fresh ideas.

7.6 Conclusion

This chapter identified that what is missing from the current response is a national strategy with identified national standards and a national coordinator. The current responsibility for CCE in county lines rests with the Home Office who have no child protection or safeguarding remit. Hence, the response to date has been largely law enforcement led and as such ineffective. The proposal for a national coordinator made by this research as part of its contribution to practice states that person should not come from the law enforcement
agencies. Participants argued that the phenomenon should be reframed as a societal issue with shared responsibility across statutory, non-statutory and communities rather than defined as a drug issue with the police as the lead. This would mean removing lead responsibility from the Home Office and, possibly as in the case of CSE, assigning the Department for Education as the lead.

Also required is bespoke legislation for CCE to safeguard better children and young persons, where perpetrators are labelled as child abusers, a mark no self-respecting drug dealer would want. Training should include the experiences of victims and perpetrators of exploitation to help improve understanding across the responding agencies and within communities. By listening to their experiences, they would help form part of the solution to the phenomenon in a way that currently they are not engaged. Raising parental/guardian knowledge of CCE in county lines is of paramount importance if they are to feel better equipped to protect their offspring/wards.

Chapter Eight concludes this thesis with a review of the chapters and the key findings. It highlights the original contribution to theory and practice this research makes and offers recommendations for future practice and suggestions for further research.
Chapter Eight: Conclusion

8.1 Introduction

This thesis set out to answer the research question as to what are the challenges and controversies when dealing with a national problem at a local level in relation to child criminal exploitation in county lines in England and Wales. The next section summarises the key findings from the research conducted to answer that question. It begins with a reminder of the research objectives (ROs).

8.2 Key Findings

Chapter One outlined the research objectives. They are replicated here in table 8.1.

<table>
<thead>
<tr>
<th>No.</th>
<th>Research Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>RO1</td>
<td>To establish how child criminal exploitation is constructed and understood in county lines in England and Wales by the police and those agencies with whom the police engage when dealing with criminally exploited children.</td>
</tr>
<tr>
<td>RO2</td>
<td>To discover how this understanding influences and shapes how the police and those agencies respond to criminally exploited children.</td>
</tr>
<tr>
<td>RO3</td>
<td>To identify what challenges and controversies the current response represents to both the police and the agencies with whom they work.</td>
</tr>
<tr>
<td>RO4</td>
<td>Based on the findings from ROs 1-3, what the implications for future policy and practice would be when identifying and dealing with child criminal exploitation in county lines.</td>
</tr>
</tbody>
</table>

Table 8.1: Research Objectives

The research objectives (RO) framed the design of the thesis. Chapters Two and Five relate to RO1. Chapters Three and Six to RO2 and RO3 and Chapter Seven was designed around RO4 as illustrated in table 8.2. The key findings linked to those objectives and their chapter are also included for ease of reference.
<table>
<thead>
<tr>
<th>Research Objective (RO)</th>
<th>Literature Review Chapter</th>
<th>Findings and Discussion Chapter</th>
<th>Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>RO1</td>
<td>Chapter Two</td>
<td>Chapter Five</td>
<td>Finding One: The HM Government (2018a) definition needs updating to reflect the changes to county lines</td>
</tr>
<tr>
<td></td>
<td></td>
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<td>Finding Two: Practitioner understanding of CCE in county lines remains limited</td>
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<td>Finding Three: The term county lines masks the criminal exploitation of children</td>
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<td>Finding Four: There are no national standards applied in the recording of CCE in county lines</td>
</tr>
<tr>
<td>RO2 &amp; RO3</td>
<td>Chapter Three</td>
<td>Chapter Six</td>
<td>Finding Five: There are organisational and regional variances in practice in the response to CCE in county lines</td>
</tr>
<tr>
<td></td>
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<td>Finding Six: Use of the Modern Slavery Act 2015 is not making a significant difference</td>
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<td>Finding Seven: The numbers of safeguarded children are exaggerated</td>
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<td>Finding Eight: Short-term funding has a detrimental impact on the response</td>
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<tr>
<td>RO4</td>
<td>Chapter Seven</td>
<td>Finding Nine: Why a national strategy is required</td>
<td></td>
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<tr>
<td></td>
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<td>Finding Ten: CCE in county lines as a community issue, not just a policing problem</td>
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<td></td>
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<td>Finding Eleven: There is a need to make it harder to exploit children and young persons</td>
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<td>Finding Twelve: Children and young persons must be engaged in the solution</td>
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Table 8.2: Summary of research findings

**Chapter Five** identified that the current HM Government (2018a) definition of county lines does not reflect the growing use of local children and young persons, many of whom are not gang or gang affiliated. The current definition is injurious to seeing the problem as existing
outside those caught up in the drugs milieu. It means that practitioners, parents and guardians alike fail to recognise the signs or even consider that a child/their offspring could be a victim of this exploitative model. Practitioners have called for an updated definition and for a better description, agreed upon at the national level, as currently different descriptions are used by the police, local authorities, education and health organisations.

Also identified through this research was that the understanding of the CCE in county lines remains limited to those working directly in the field. Evidence suggests there is some degree of victim blaming despite the adoption of child-centred policing and a greater focus on recognising vulnerability. Many frontline officers who are often the first on the scene lack the necessary training and knowledge of the signs to recognise. This finding echoes that of an earlier Ofsted (2018) report and suggests that there is still more to be done to ensure the benefits of such learning translate into better identification of and outcomes for criminally exploited children.

This research also identified that the name county lines masks the criminal exploitation of children. A failure to adopt the use of the term CCE as the nationally accepted nomenclature to describe criminally exploited children in county lines means that the exploitation can remain hidden behind the framing of the issue as county lines and therefore, drug dealing.

The review of literature in Chapter Two identified previous research that found children working of their own volition (Robinson et al., 2019) and with a degree of personal agency (Moyle & Coomber, 2017). Whilst in these circumstances it is unlikely that they will see themselves as victims of CCE, the responding agencies should be reminded that no child or young person can consent to be criminally exploited. For over-stretched practitioners, it is accepted that this will present a challenge but guidance urges agencies to remain in contact with children who are unwilling to engage and to see their behaviour in a wider context (Ofsted, 2018).

The NCLCC also highlighted the difficulty they face in attempting to produce reliable data on the phenomenon despite the presence of national tasking and that county lines is a national threat (HM government, 2016: NCA, 2017). This is linked to not adopting the term CCE, meaning that data is recorded differently by the police and organisations involved. This then
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

...affects the quality of the data analysis and understanding of the scale of the problem. Similarly, tracking progress towards targets (if they exist beyond the tired metrics of arrests and seizures of drugs, money and weapons) is impossible nor can the responding agencies establish, with any confidence whether they are having an impact on the problem. The inability to fully describe the phenomenon supported by accurate data some seven years after county lines first emerged in the academic literature, is both a challenge and a controversy when dealing with CCE in county lines at the local level.

Chapter Six covered the over-exaggeration of safeguarding interventions, symptomatic of a wider misuse of the term contextual safeguarding. The lack of a national standard as to what should count when measuring what safeguarding an exploited or potentially exploited child or young person means, highlights the need for the adoption of a nationally agreed framework and standards.

This research also identified the widespread variance in practice in the response to CCE in county lines among responding agencies both at an organisational and a regional level. The current structure of 43 police forces plus the BTP and 355 local authorities and a patchwork of other statutory and non-statutory bodies presents a real challenge in terms of coordination of their activity. The NCLCC, formed in 2018, has worked hard to bring greater cohesion to the identification and response to county lines. However, critics argue that it’s an organisation ‘by the police for the police’ and that as such it fails to provide a national coordinated multiagency. Furthermore, its focus is, as the name suggests, primarily on county lines, not child criminal exploitation.

CCE in county lines has exposed the inadequacies of the current organisational architecture. Until addressed, varied and arbitrary practices across England and Wales between the responding agencies, and often within the same organisation will continue to exist.

Previous research has warned of the dangers of siloed working, for example, Ofsted (2018), Barlow (2019), Mills and Unwin (2020), Shaw and Greenhow (2020) and Pitts (2021). The results of this research suggest that the agencies are yet to respond sufficiently to that criticism. An inability to share information in a timely fashion and nervousness around GDPR further encourages siloed working.
This research found that the use of the Modern Slavery Act 2015 has failed to make any quantifiable inroads into reducing the use of children and young persons in county lines. This research identified that 75 per cent of all case referrals came from just seven police forces in England and Wales. Convictions remain low and often the penalty imposed by charges under the Misuse of Drugs Act 1971 is higher. This questions why Modern Slavery Act 2015 charges are also added, especially if the perpetrator is then not treated as an exploiter in the prison system. The use of the National Referral Mechanism has also resulted in long delays. The Covid pandemic situation has exacerbated the situation and because of the backlog of cases, perpetrators are pleading for an offence under the Misuse of Drugs Act 1971, entering the prison system as drug dealers, not child exploiters. When considered alongside that in the case of minors, the NRM brings no additional benefit to Section 48 of the Children Act 1989, these factors are significant enough to call for a rethink of the continued advocacy of using the Modern Slavery Act 2015.

The last finding in this chapter concerned the short-term nature of the funding of the response to CCE in county lines. This has resulted in an inability to attract the right people or retain staff. Funding was also often late arriving, leaving little time for planned activities to take place. This also impacted the ability of the services to adopt more proactive as opposed to reactive activities.

Chapter Seven identified the case for a national strategy to combat the identified problems listed above. CCE in county lines needs a collective response to tackle it rather than it being a police problem. This requires effective partnership working. Whilst MASH arrangements exist, they need to go further with functioning community safety partnerships as were once envisaged under the Crime and Disorder Act 1998. The colocation of partner agencies is also a key ingredient.

The research identified the apparent low level of awareness of CCE in county lines among parents/guardians and within the communities of England and Wales. This is possibly linked to the framing of it as a drug dealing issue but as this research has highlighted all children are vulnerable to CCE, not just those linked to gangs and/or the drugs world. Educating and
involving communities is key to building resilience as part of a national response to CCE in county lines.

This research also discovered support for labelling the criminal exploiters of children and young persons, *child abusers*, similar to how society views paedophiles. This research also identified near universal support for bespoke legislation tailored to CCE in county lines, rather than the manipulation of existing legislation. Participants wanted to see increased sanctions for perpetrators who criminally exploit children and for them to enter prison as *child abusers* rather than hide behind the label of a drug dealer, a badge of honour for many offenders.

The research findings lend weight to the argument that a serious national problem such as the criminal exploitation of children and young persons requires a national response. Whilst this research accepts that service delivery needs to be at the local level (as suggested by Pitts, 2019; Harding, 2020), it identified that missing is a national policy framework. Lead responsibility should not rest with the law enforcement agencies although they have an important role to play. Linking bespoke legislation, effective partnership working and full community engagement would help successfully and effectively safeguard children and young persons from criminal exploitation and deal effectively with their exploiters.

The next section makes several recommendations for future practice related to CCE in county lines based on the findings of this research.

### 8.3 Recommendations

This section is similarly structured to Chapter Three. It covers the recommendations from the research findings using the headings of the theoretical framework adopted for this study: the *policy framework, legislation, and operational*. The recommendations are linked to their relevant research finding(s). The section forms the original contribution to practice from this thesis.

#### 8.3.1 The Policy Framework

There should be a distinct and separate national policy for CCE in county lines. It could include other forms of CCE to avoid perpetuating a threat-based approach and more siloed activity.
The policy needs to make it clear this is not a policy to reduce drug offending, or drug taking but to counter the criminal exploitation of children and young persons (Findings Two, Three and Nine).

To facilitate this, what is urgently required is a nationally agreed and adopted definition and description of CCE in this context so that the relevant organisations and agencies are clear on both how to define the activity but also the thresholds for intervention. The term CCE should be adopted as the national nomenclature to describe the criminal exploitation of children and young persons, not county lines: which is merely the vehicle through which it occurs but does not adequately describe the exploitation. Whilst service delivery will always be at the local level, stopping the criminal exploitation of children and young persons is the national priority. (Findings Three and Four)

A national policy should identify the role of statutory and non-statutory partners and set minimum national standards for those organisations. This would link in the identification of measures of success that go beyond the tired metrics of numbers of arrests and drugs and other commodities seized: these are not relevant to tackling criminal exploitation. The strategy would also define the national minimum standards for safeguarding not only to ensure that those exploited or at risk of exploitation are adequately safeguarded, but that exaggerated claims that lead to a false impression do not skew the national data on safeguarding. (Findings One, Three and Seven)

A national coordinating body should be established led by a national coordinator accountable to the government. This person should not be drawn from the policing agencies. The Home Office who have led on CCE to date have no safeguarding or child protection remit and this accounts for why responses to date have been enforcement focused. The Police Foundation (2022) has called for a National Crime prevention Agency arguing that by placing the primary responsibility on the criminal justice system, the focus is on reactive responses to crime and disorder rather than preventative measures. The national coordinating body proposed in this research could form part of that agency. (Finding Ten)

The strategy would have as its aim to deliver a coordinated and cohesive national understanding and response to CCE to minimise siloed working and the negative impacts of
organisational and regional variance. It should recognise that there are no short-term solutions to CCE in county lines as previously identified by Harding (2020). It will also ensure national minimum standards for training of all relevant statutory and non-statutory bodies. Involving the lived experience of victims and perpetrators of criminal exploitation alongside that of the work of charities such as St Giles Trust would help to end the victim blaming that persists in some quarters. (Findings Two and Five)

8.3.2 Legislation

The Children’s Society report (Turner et al., 2019), The Children’s Commissioner (2019) and HMICFRS (2020) have all called for a legal definition of CCE and for CCE to be a national priority. This research lends its voice to that call. As yet, a legal definition still alludes academics and practitioners alike. The legislation should identify those who criminally exploit children and young persons as *child abusers*, not drug offenders, not human traffickers. The prosecution of alleged offenders under this legislation would remove the need for a referral through the National Referral Mechanism (NRM) for a conclusive grounds decision as to whether a minor is a victim of modern slavery. Prosecutions under the new Act must not be plea bargained away to lesser charges under the Misuse of Drugs Act 1971, for example, and those convicted must enter the prison estate as child abusers and not as drug addicts to ensure an end-to-end strategy. (Findings One, Four and Eleven)

In the interim, there is no need to refer children and young persons through the NRM. Section 48 of the Children Act 1989 covers sufficient safeguards. The police, their partners, and the CPS who have access to the material can decide whether the evidence supports that a child or young person is a victim of modern slavery. (Finding Six)

8.3.3 Operational

The current structure of 43 Home Office police forces, the BTP and 355 local authorities is not conducive to the provision of a national response. This is a theme from previous research (Harding, 2020). The Chair of the NPCC, Martin Hewitt has also argued that the current structure is not fit to meet 21st-century threats. Despite his call made over two years ago, the policing model has not changed (Police Professional, 2020). More recently, the Police
Foundation (2022) also identified that the current policing structure fails to provide a strong strategic centre to meet future challenges and when dealing with crimes that transcend county and national borders. The economies of scale from a reduction in the number of separate authorities and police would help fund the combatting of CCE in county lines as well as help remove the short-term nature of the current funding structure. (Findings Five and Eight)

Colocation of the responsible agencies in a multiagency hub working together daily with effective partnerships driven by the national strategy would aid better and more effective partnership working. (Finding Ten)

Linked to the above, the responding organisations should have access to a shared national database. This would cover relevant information including the daily reports only produced during the intensification weeks. Wherever an exploiter or exploited person may be in England or Wales, their case history and their antecedents should be readily available to ensure that decisions on how best to respond are made with full knowledge of the facts. (Findings Five and Seven)

A national campaign to raise community awareness and better inform parents/guardians and the public that child criminal exploitation in county lines is not only about gangs, and that it is not happening elsewhere, but across England and Wales. It should involve children and young persons who must be seen as children first, offenders second (CFOS) as a system of positive youth justice. The campaign should aim to reach the same level of national awareness that exists as the See it, Say it, Sort it public safety awareness campaign for terrorism. (Finding Eleven)

There needs to be a better understanding that the legislation permits data sharing in this context. Dynamic intelligence and data-sharing agreements should be in place. The impact of the recently passed Police, Crime, Sentencing and Courts Act 2022 may provide some of the answers, but it is too early to say at this juncture. (Finding Five)

There is also a pressing need for agreed data recording standards so that recording CCE in county lines uses the same nomenclature across England and Wales. This would help promote
greater confidence in the analysis of the scale of the problem and the impact of the response. There should be an expansion of GAIN, or a similar system to cover CCE as this type of CCE may not meet the thresholds of serious and organised crime (SOC). (Findings Three and Four)

Consideration should be given to repurposing some of the money dedicated to the law enforcement response to non-enforcement activities that include medium to longer-term planning and preventative strategies. There are no quick fixes and short-term, cliff-edge funding restricts the ability of the services to be more proactive in preventing exploitation and recruiting and retaining the right staff. (Finding Eight)

8.4 Original Contribution to Knowledge

This research involved a unique evaluation of child criminal exploitation in county lines in England and Wales by examining the challenges and controversies of dealing with a national problem at the local level. From this novel perspective, this thesis makes a valuable contribution to the limited knowledge base of CCE within county lines.

It is particularly timely because the number of children and young persons criminally exploited shows signs of increasing (HM Government, 2016) while at the same time, HM Government’s (2021) Drugs Strategy sets goals for not only reducing the number of county lines operating but increasing the number of children safeguarded. However, if this is to be achieved then this research found no consensus on what safeguarding actually means, and how it is measured. It is, therefore, a matter of conjecture leading to overly inflated claims of children being safeguarded when, in many cases, little more than a referral has been made.

It has also shown there are gaps in our collective knowledge of how county lines is defined and understood, as well as how it is measured considering it is recorded under a taxonomy of terms. It means that where there is strict adherence to HM Government’s (2018a) outdated definition of county lines it is likely that neither victims nor offenders are properly identified with the result that they continue to be exploited and/or exploit others.

The failures identified through this research in the identification and recording of CCE in county lines impact negatively on the responses to the phenomenon. Responses vary at a regional and organisational level highlighting the need for a national strategy that prioritises
responses to the exploitation of children and young persons over the current short-term funded responses to the problem aligned more to tackling the supply of drugs, and therefore with primary responsibility resting with the police.

Use of the Modern Slavery Act (MSA) 2015 to prosecute exploiters as human traffickers is beset with problems caused by limited adoption across the police forces in England and Wales (at just 16 per cent), low levels of successful prosecutions, plea bargaining for the charges to be dropped in preference for a conviction under the Misuse of Drugs Act 1971, entrance into the prison system as a drug dealer, not a human trafficker, severe delays caused from awaiting conclusive grounds decisions through referrals made to the National Referral Mechanism and court delays due to the impact of the Covid pandemic. This research found therefore that perseverance with the use of this legislation is unlikely to deliver the intended consequences of making the criminal exploitation of children less attractive to exploiters who would not want the stain on their reputation of being labelled a human trafficker. This original contribution to knowledge contrasts with other studies that either highlight use of the MSA 2015 as a potential solution (e.g., Spicer 2019a who made the inference regarding the unwanted stain above) or shows recent continued support for use of the Act in these circumstances (e.g., Olver & Cockbain, 2021).

Lastly, this research indicates that greater awareness of CCE in county lines is required among parents/guardians and communities who have largely been left out of discussions both on the topic and responses to this societal problem. The voices of affected children and young persons too have not been incorporated in finding solutions and this represents a missed opportunity to safeguard and protect better this vulnerable group within our society.

The contribution to knowledge this research makes, either as original knowledge or in support of the findings of previous research, has been translated into the recommendations made in section 8.3 to improve both policy and practice. This thesis also makes recommendations below for continued research to add to the policy, practice and knowledge-building discourse needed in England and Wales to identify and respond better to CCE in county lines.

8.5 Further Research
Despite the increased focus on county lines since its emergence in the academic literature in 2015, the current volume of literature on CCE remains low. The data issues discovered in this research highlight the need for more research using what data is available to understand the impact of arrests, especially during the so-called intensification weeks on levels of exploitation. Research is needed to identify what effective safeguarding would look like for this cohort of criminally exploited children and young persons to avoid tokenistic or regional variances in practice. Furthermore, a study conducted nationally on the impact of the range of the current responses would help provide a larger body of evidence of their utility and help shape the formation of better plans and tactics. The list of harms exploited children may experience as Adverse Childhood Experiences (ACEs) is yet to receive sufficient policy, media or academic attention (Windle & Briggs, 2015b) and yet if we are to understand better the complex needs of this cohort then this would be a good place to start.

Despite the ethical difficulties inherent in conducting research with exploited children and young persons and their exploiters, there is a need to engage with them and to hear their voices directly. As Harding said in his interview, “we have to find solutions with young people, not solutions to young people.” He told the researcher of his experience of studying gangs in London where he had to spend considerable time riding around on the back of a motorbike with them to gain their trust. Few researchers may be able or willing to do that but more research to identify the factors that cause some young people to engage with county lines whereas others do not would be enlightening. The data could inform a public health response aimed at reducing the youth violence linked to the exploitative county lines model (Bonning & Cleaver, 2021). The use of children under the age of criminal responsibility exploited in county lines (The Children’s Society. (n.d.). although at present limited to one reference represents a worrying dynamic if repeated. There is a lacuna of information on the use of very young children in this context and represents a significant gap in the knowledge highlighting the need for urgent research in this area. There is, therefore, a pressing need to hear directly the voice of criminally exploited children to understand better their lived experiences (Windle et al., 2020) with the ambition to reduce the harm they suffer and to inform discussion on policy as suggested by Robinson et al. (2019).
8.6 Concluding Comment

Returning to the words at the very beginning of this thesis from Nelson Mandela (1995) “there can be no keener revelation of a society’s soul than the way in which it treats its children.” This research has highlighted that there are significant challenges and controversies in dealing with CCE in county lines in England and Wales at the local level. The continued criminal exploitation of children and young people remains a stain on the soul of our society: it requires a national response in the form of policy, legislation and operational practice. This research recognises that drug dealing and drug abuse have become entrenched in our society. However, CCE in county lines is not about that, it is a dangerous and toxic world of exploitation, violence and coercion that is severely impacting the youth of today and thereby both their and our future. The results of this research show that Identifying and responding to CCE in county lines needs to be everyone’s responsibility, not just that of the police or the statutory and non-statutory organisations. It is a societal problem that requires a societal response. As this police officer says:-

If we can stop them from exploiting kids and sending kids out on these lines, if you can stop the violence associated with these people, I think that’s a real victory. (LE18)


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National County Lines Coordination Centre [NCLCC]. (2021). *County Lines Strategic Assessment 2020/21*. PRGloo: [https://cdn.prgloo.com/media/a814c42e66be436298757f5099bd3fd6.pdf](https://cdn.prgloo.com/media/a814c42e66be436298757f5099bd3fd6.pdf)


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NCA. (2019c, May 21). *Hundreds arrested and more than £310k cash seized as part of national activity targeting County Lines drug gangs.*


NCA. (2020). *National Strategic Assessment of Serious and Organised Crime.*

https://www.nationalcrimeagency.gov.uk/component/finder/search?q=National+Strategic+Assessment+of+Serious+and+Organised+Crime&Itemid=101&Itemid=101


https://www.nationalcrimeagency.gov.uk/component/finder/search?q=National+Strategic+Assessment+of+Serious+and+Organised+Crime&Itemid=101&Itemid=101


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The Children's Society. (2015, November). *Old enough to know better? Why sexually exploited older teenagers are being overlooked*. BASW: [https://www.basw.co.uk/system/files/resources/basw_110109-1_0.pdf](https://www.basw.co.uk/system/files/resources/basw_110109-1_0.pdf).


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guidance-for-youth-justice-services/youth-justice-plans-guidance-for-youth-justice-services

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## Appendices

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Table A.1: List of Appendices
Appendix A: Literature Review Strategy

A.1 Search Strategy

The literature search sought to identify all relevant materials that met the inclusion criteria below. To do this, search strings were developed (see A.6) with a wide range of search terms associated with child criminal exploitation in county lines. Other methods employed to ensure all relevant studies were identified included snowballing, where additional sources were found through the reference list of sources identified through the search strategy. Following the full execution of the search strategy, the researcher engaged in hand searching, particularly in areas where the search strategy had produced limited results.

A.2 Inclusion Criteria

The inclusion criteria for the literature review below recognises the contemporary nature of child criminal exploitation in county lines.

<table>
<thead>
<tr>
<th>Criteria type</th>
<th>Inclusion criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time period</td>
<td>As a contemporary issue the literature review focussed on material published between 2000 and 2022 (up to the production of the thesis)</td>
</tr>
<tr>
<td>Language</td>
<td>English</td>
</tr>
<tr>
<td>Publication form</td>
<td>Peer-reviewed journal articles, Book or book chapter, Grey literature to include law enforcement assessments (not protectively marked), Workshop or conference report, Other reports, including programme documents, Media reporting</td>
</tr>
<tr>
<td>Publisher type</td>
<td>Academic organisation, Think-tank, Multilateral or inter-governmental organisation, National government organisation, including international development cooperation, Non-governmental organisation, Charities</td>
</tr>
<tr>
<td>Geographical scope</td>
<td>England and Wales</td>
</tr>
<tr>
<td>Research design</td>
<td>Experimental or quasi-experimental, Observational, Secondary review (systematic or other literature reviews)</td>
</tr>
</tbody>
</table>

Table A.2: Search strategy for literature review: Inclusion criteria
### A.3 Databases for Search

Several databases were searched, using a mixed strategy of applying search terms and strings, and for smaller repositories, applying hand searches. These databases comprise major academic literature databases (EBSCO Discovery, Web of Knowledge and Google Scholar), specific academic journals, grey literature from professionals working in the field, and publication databases from those think-tanks that actively work on criminal exploitation in county lines and its related offences.

<table>
<thead>
<tr>
<th>Database</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EBSCO Discovery</td>
<td>Searches across all areas for electronic resources</td>
</tr>
<tr>
<td>Web of Knowledge</td>
<td>Search terms are matched with the articles’ keywords and abstracts. <a href="#">1</a></td>
</tr>
<tr>
<td>JSTOR</td>
<td>An extensive academic journal archive</td>
</tr>
<tr>
<td>SocINDEX</td>
<td>Recommended for sociology and criminology topics.</td>
</tr>
<tr>
<td>Google Scholar</td>
<td>Contains journal articles and grey literature and displays citation counts.</td>
</tr>
<tr>
<td>Royal United Services Institute</td>
<td>Open access repository of research, studies and policy briefs produced by RUSI- includes organised crime (OC) and related topics.</td>
</tr>
<tr>
<td>Chatham House</td>
<td>Open access repository of reports, research papers, briefings and books produced by Chatham House on OC and related areas.</td>
</tr>
<tr>
<td>Institute for Security Studies</td>
<td>Open access repository of publications produced by ISS from its own research.</td>
</tr>
<tr>
<td>United Nations Office for Drugs and Crime (UNODC)</td>
<td>Open access repository of global OC research and trend analysis produced by the UNODC.</td>
</tr>
<tr>
<td>British and Irish Legal Information Institute (<a href="http://www.bailii.org">www.bailii.org</a>)</td>
<td>Search case law for England and Wales Criminal Division especially for legislation/appeals against the application of the Modern Slavery Act 2015</td>
</tr>
</tbody>
</table>

Table A.3: Databases

### A.4 Academic Journals
While it was expected that EBSCO Discovery, Web of Science and Google Scholar would capture a large proportion of academic sources, the following journals were also accessed to ensure comprehensiveness of the search strategy.

<table>
<thead>
<tr>
<th>Academic Journal</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Criminology</td>
<td>Articles on criminology and criminal justice.</td>
</tr>
<tr>
<td>British Journal of Criminology</td>
<td>Articles and reviews on delinquency and deviant social behaviour.</td>
</tr>
<tr>
<td>Critical Criminology</td>
<td>Presents alternative perspectives.</td>
</tr>
<tr>
<td>European Journal of Criminology</td>
<td>Research and scholarship on crime and criminal justice institutions.</td>
</tr>
<tr>
<td>Journal of Criminal Law and Criminology</td>
<td>The most widely read and cited criminal law journal</td>
</tr>
<tr>
<td>Crime, Law and Social Change</td>
<td>Crime and deviance at the global, national, regional and local level.</td>
</tr>
<tr>
<td>Trends in Organised Crime</td>
<td>Original research and excerpts of significant government reports. Analysis and commentary on OC.</td>
</tr>
<tr>
<td>Cambridge Journal of Evidence-Based Policing</td>
<td>Research on Evidence-Based Policing.</td>
</tr>
<tr>
<td>Elsevier</td>
<td>For scientific, technical, and medical research.</td>
</tr>
<tr>
<td>Journal of Youth Studies</td>
<td>Focuses on young people within a range of contexts including involvement in crime and consumption.</td>
</tr>
<tr>
<td>Sage Journals: Youth Justice</td>
<td>Analyses of global juvenile/youth justice systems, law, policy and practice.</td>
</tr>
<tr>
<td>British Journal of Sociology</td>
<td>Covers all aspects of sociology, including theory.</td>
</tr>
<tr>
<td>Sociology</td>
<td>Covers a broad range of sociology topics.</td>
</tr>
<tr>
<td>Sociological Review</td>
<td>Covers all branches of sociology.</td>
</tr>
</tbody>
</table>
### Table A.4: Journals

<table>
<thead>
<tr>
<th>Journal of Gender Studies</th>
<th>Includes articles relating to gender and sex from a feminist perspective.</th>
</tr>
</thead>
<tbody>
<tr>
<td>College of Policing Digest</td>
<td>For contemporary police law, operational policing practice and criminal justice.</td>
</tr>
<tr>
<td>The Police Journal</td>
<td>Theory, research and practice to advance knowledge in different areas and diverse aspects of policing.</td>
</tr>
<tr>
<td>Police Quarterly (PQ)</td>
<td>Publishes empirical studies on issues related to policing.</td>
</tr>
<tr>
<td>Policing: A Journal of Policy and Practice</td>
<td>Covers wide range of law enforcement related policies and practice.</td>
</tr>
<tr>
<td>Policing and Society</td>
<td>For police policy, legal police powers and management of police organisations.</td>
</tr>
<tr>
<td>Police practice and research</td>
<td>Global police research and operational/administrative practices.</td>
</tr>
</tbody>
</table>

### A.5 Websites

<table>
<thead>
<tr>
<th>Relevant Websites</th>
<th>URL</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Government Sources</strong></td>
<td></td>
</tr>
<tr>
<td>College of Policing</td>
<td><a href="https://www.college.police.uk/Pages/Home.aspx">https://www.college.police.uk/Pages/Home.aspx</a></td>
</tr>
</tbody>
</table>
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<table>
<thead>
<tr>
<th>Website</th>
<th>Link</th>
</tr>
</thead>
</table>
| The Children’s Commissioner | [https://www.childrenscommissioner.gov.uk/?s=county+lines](https://www.childrenscommissioner.gov.uk/?s=county+lines)  
[https://www.childrenscommissioner.gov.uk/?s=child+criminal+exploitation](https://www.childrenscommissioner.gov.uk/?s=child+criminal+exploitation) |
| Parliament | [https://websearch.parliament.uk/?q=county%20lines](https://websearch.parliament.uk/?q=county%20lines)  
[https://websearch.parliament.uk/?q=child+criminal+exploitation](https://websearch.parliament.uk/?q=child+criminal+exploitation) |

### Non-Government Sources

<table>
<thead>
<tr>
<th>Website</th>
<th>Link</th>
</tr>
</thead>
</table>
| Police Federation Papers | [https://www.polfed.org/search-page/?query=county+lines&x=0&y=0&p=0](https://www.polfed.org/search-page/?query=county+lines&x=0&y=0&p=0)  
[https://www.polfed.org/search-page/?query=child+criminal+exploitation&x=18&y=20&p=0](https://www.polfed.org/search-page/?query=child+criminal+exploitation&x=18&y=20&p=0) |
| St. Giles Trust | [https://www.stgilestrust.org.uk/search?content=county+lines](https://www.stgilestrust.org.uk/search?content=county+lines)  
[https://www.stgilestrust.org.uk/search?content=child+criminal+exploitation](https://www.stgilestrust.org.uk/search?content=child+criminal+exploitation) |
| MOPAC | [https://www.london.gov.uk/search?s=county%20lines](https://www.london.gov.uk/search?s=county%20lines)  
[https://www.london.gov.uk/search?s=child%20criminal%20exploitation](https://www.london.gov.uk/search?s=child%20criminal%20exploitation) |
| Safer London | [https://saferlondon.org.uk/about-us/](https://saferlondon.org.uk/about-us/) |
| Abianda | [http://abianda.com/services/](http://abianda.com/services/) |

Table A.5 Websites

### A.6 Search Terms and Search Strings
Several keywords based on child criminal exploitation in county lines have been identified as relevant search terms. These search terms were used in various configurations depending on the limitations of the database used. For databases that allow for more comprehensive Boolean strings, the search strings included combinations of the following categories of search terms:

[Person] + [Influencing Agent] + [Mechanism] + [Responding Agent] + [Geographic focus]

For example, Web of Science has a less restrictive search function, allowing for use of more comprehensive Boolean strings. The complete search string is reproduced below; it was adapted according to the restrictions of the various other databases.

("child*" OR "young person*" OR "teen*" OR "young*" OR "kid") AND ("gang*" OR "organised crim*" OR "organised crim* groups" OR "organised crim* gangs" OR "crime" OR "OTD" OR "out of town dealer*" AND ("exploit*" OR "crim* exploit*" OR "vulnerable*" OR "vulnerable* young person*" OR "traffick*" OR "traffik*" OR "human traffick*" OR "people traffick*" OR "abuse*" OR "misuse*" OR "mistreat*" OR "at risk" OR "coerce*" OR "pressur*" OR "manipulate*" OR "expose*" OR "weak*" OR "susceptible*" OR "helpless" OR "defenceless" OR "enslave*" OR "slave*" OR "modern slave*" OR "county line*" OR "going county") AND ("Police*" OR "law enforcement" OR "NCA" OR "National Crime Agency" OR "SOCA" OR "Serious Organised Crime Agency" OR "National County Lines Co-ordination Centre" OR "Charity*" OR "Local Authority" OR "multi-agency*" OR "multi-agency*" OR "Youth offender* service*" OR "youth offender* team*" OR "child* Service*" OR "safeguard*" OR "child* protect*" OR "place of safety" OR "NRM" OR "National Referral Mechanism" OR "Independent Child Trafficking Advocate*" OR "ICTA*") AND (England OR Wales OR Great Britain OR Britain OR UK OR United Kingdom).

In the case of repositories for non-academic sources such as RUSI, in-site search functions are often basic and rarely accept complex Boolean strings. To increase comprehensiveness, a generic search engine (for example, Google) was used to complete more complex search strings. The search string configuration used via a search engine was as above.

Where databases only allow for a restricted character length for the search configuration then the use of the same search terms was applied but using the following short sub-strings to capture all the keywords:

[Person] + [Mechanism] + [Geographic focus]

For example-
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

(“child* OR “young person*”) AND (”exploit*” OR “county line*” OR “crim* exploit*”) AND (England OR Wales).
Appendix B1: Research Questions for Key Informants

General

Q. We have discussed the research, the purpose of this interview and the details disclosed in the information sheet. We have also covered other important considerations to include the need for your written consent, your rights to withdraw from the research and how your response will be anonymised in order to protect your identity and that of your organisation. Is there anything you wish to discuss or clarify before we start?

Aim 1: To understand how child criminal exploitation (CCE) is constructed and understood in England and Wales by the police and some of the agencies with whom the police engage when dealing with criminally exploited children.

Q. What definition(s) are you aware of in relation to CCE?
Q. Do you have a definition that you use in your research? How did it change over time?
Q. How do you identify and assess vulnerability?
Q. What factors make someone vulnerable to criminal exploitation?
Q. What are the signs of CCE? How easy are they to spot?
Q. In your experience, do the agencies use the same definition of CCE and vulnerability?
Q. If not, what are the implications of using different definitions?
Q. What would be the benefits/disadvantages of adopting a universal definition and/or legal definition?

Aim 2: To establish how this understanding influences and shapes how the police and those agencies respond to criminally exploited children.

Q. How does the use of definitions impact the way the police and relevant agencies identify and deal with CCE?
Q. Has their response evolved over time? If so, how?
Q. Are there differences in how some potential victims are identified and subsequently treated? If so, what factors influence this?
Q. Has this changed over time? If so, what factor(s) have influenced that change?

Aim 3: To establish what challenges, controversies as well as opportunities the current response represent to both the police and the agencies with whom they work.
Q. In your research have you identified practices adopted by the police and/or other agencies that you feel are particularly effective in identifying and dealing with CCE? (i.e., results, innovation, impact). Have the practices been adopted elsewhere?

Q. Have you identified any practices, legal constraints or other influences that are counter-productive to the agencies achieving their aims when identifying and dealing with CCE?

Q. Taking each in turn, at a local, regional and national level how effective do you think the current response is by the police and other agencies?

Q. What criteria do you use to define effectiveness?

Q. In your research have you identified local, regional, or national variations that necessitate individually tailored response(s)? If so, what are they?

Q. What challenges, if any, do you think the police and other agencies face from the adoption of their current response?

Q. What benefits, if any, have you identified that stem from the current response?

**Aim 4: To establish what the implications for future practice would be of adopting a more nuanced approach to child criminal exploitation, examining whether there is a case for the adoption of a national response, whether the response should remain intrinsically local or whether a hybrid model mixing both national and local responses is required**

Q. How coordinated is the current response to CCE at the local, regional and national level?

Q. Do you believe there could be a different way of dealing with CCE at the local, regional & national level?

Q. Are there practices/policies/levels of understanding that would benefit from wider adoption by the relevant organisations and agencies that deal with CCE?

Q. How do you think this might lead to a different response? What would be the benefit(s) and/or disadvantages of wider adoption?

Q. How easy or difficult would it be for these policies/practices to be adopted nationally?

Q. What would it take for this to happen, i.e., how could it be achieved?

Q. What are the inhibitors to wider adoption?

**General**
Q. Is there anything else about the subject area that you would have expected to be covered and wish to talk about?

Q. Is there any answer you have given you wish to return to in order to clarify or amend?

Q. Are you willing for me to contact you again if there is anything that needs clarification or updating considering this is a contemporary issue and developments in this area are constant?
Appendix B2: Research Questions for Police and Other Agencies

General

Q. We have discussed the research, the purpose of this interview and the details disclosed in the information sheet. We have also covered other important considerations to include the need for your written consent, your rights to withdraw from the research and how your response will be anonymised in order to protect your identity and that of your organisation. Is there anything you wish to discuss or clarify before we start?

Aim 1: To understand how child criminal exploitation (CCE) is constructed and understood in England and Wales by the police and some of the agencies with whom the police engage when dealing with criminally exploited children.

Q. What definition, if any, does your organisation use for CCE?

Q. What is your personal understanding of CCE? Does this differ from above?

Q. How do you identify and assess vulnerability?

Q. What factors make someone vulnerable to criminal exploitation?

Q. Do the agencies/individuals with whom you work use the same or a similar definition of CCE and vulnerability?

Q. If not, what would be the benefits/disadvantages of adopting a universal definition and/or legal definition?

Aim 2: To establish how this understanding influences and shapes how the police and those agencies respond to criminally exploited children.

Q. How does the definition of CCE and vulnerability that you use influence the way you identify and deal with CCE?

Q. How has this evolved over time?

Q. How easy is it to spot the signs of CCE?

Q. Are there differences in how some potential victims are identified and subsequently treated? If so, what factors influence this?

Q. Has this changed over time? If so, what factor(s) have influenced that change?

Q. What practices do you/your organisation adopt that you feel are particularly effective in identifying and dealing with CCE? Are they adopted elsewhere?
Q. Have you identified any practices, legal constraints or other influences that are counter-productive to achieving your aims when identifying and dealing with CCE?

Q. What guidance, training, mentoring and/or advice have you received to help equip you with identifying and dealing with CCE?

Q. In your opinion has this been enough to equip you with the skills and knowledge to conduct your work? If not, what more would you like to see?

**Aim 3: To establish what challenges, controversies as well as opportunities the current response represents to both the police and the agencies with whom they work.**

Q. What national/regional and local structures exist to tackle CCE?

Q. In your response to CCE have you identified or made use of (a) response(s) that you feel is (are) producing good results? If so, why is this? What criteria do you use to judge success?

Q. Taking each in turn, at a local, regional and national level how effective do you think the current response is by your organisation and, where relevant, the other organisations with whom you work?

Q. What criteria do you use to define effectiveness?

Q. Are there local, regional, national variations that necessitate individually tailored response(s)?

Q. If so, how do you think this might affect the result(s) of your response to CCE?

Q. What challenges, if any, have you identified that stem from the current response?

Q. What benefits, if any, have you identified that stem from the current response?

**Aim 4: To establish what the implications are for future practice of adopting a more nuanced approach to child criminal exploitation, aggregating some of the local responses to the national level, whilst retaining others to be delivered locally.**

Q. What role does your agency/organisation/charity perform in relation to CCE? Is it a statutory obligation?

Q. Which agencies do you regularly work with?

Q. Does one agency have primacy?
Q. In your opinion, how coordinated is the current response to CCE at the local, regional and national level? Why is it so?

Q. Are there practices/policies that are counter-productive to cooperation amongst the agencies, if so what are they?

Q. Do you think there is a different way of dealing with CCE at the local, regional & national level?

Q. Are there practices/policies/levels of understanding that would benefit from wider adoption by the relevant organisations and agencies that deal with CCE?

Q. How do you think this might lead to a different response? What would be the benefit(s) and/or disadvantages of wider adoption?

Q. How easy or difficult would it be for these policies/practices to be adopted nationally?

Q. What activities should only be delivered at the local level?

Q. What would it take for this to happen, i.e., how could it be achieved?

Q. What are the enablers and inhibitors to wider adoption of uniform practices?

**General**

Q. Is there anything else about the subject area that you would have expected to be covered and wish to talk about?

Q. Is there any answer you have given you wish to return to in order to clarify or amend?

Q. Are you willing for me to contact you again if there is anything that needs clarification or updating considering this is a contemporary issue and developments in this area are constant?
Appendix C: Invitation Letter

Institute of Criminal Justice Studies. University of Portsmouth. St. Georges Building (Room 5.11), 141 High Street, Portsmouth. PO1 2HY.

Researcher: Keith Ditcham lcj90540@myport.ac.uk
Supervisor: Dr Leah Fox Leah.fox@port.ac.uk

Invitation Letter

Study Title: Child criminal exploitation in County Lines in England and Wales: challenges and controversies of dealing with a national problem at the local level

REC Ref No: FHSS 2020-067

Dear XXX,

I would like to invite you to participate in the above research study.

My Name is Keith Ditcham I am an ex Kent Police and NCA employee, spending the vast majority of my service in investigation both within the UK and as an International Liaison Officer. I am pursuing a Professional Doctorate through the University of Portsmouth and am the only researcher on this project. I have chosen the subject of dealing with child criminal exploitation, partially because it really has come to the fore as a contemporary issue at this time through the County Lines drug supply model.

XXX has identified that you might be a suitable participant in my research.

I attach an information sheet (dated January 2020, version 2.7) that provides more details of the research as well as addressing issues of confidentiality and data storage. I also attach a consent form. If having read the information sheet you are content to participate in the research please email me at the address above.

I wish to stress that participation is voluntary and you remain free to withdraw at any stage up to the point of the data being analysed.

I would like to thank you, regardless of your decision for taking the time to consider my request.

Yours sincerely,

Mr. Keith Ditcham MSc.
PARTICIPANT INFORMATION SHEET

Title of Project: Child criminal exploitation in County Lines in England and Wales: challenges and controversies of dealing with a national problem at the local level

Name and Contact Details of Researcher(s): Keith Ditcham, icj90540@myport.ac.uk

Name and Contact Details of Supervisor (if relevant): Dr Leah Fox, leah.fox@port.ac.uk

Ethics Committee Reference Number: FHSS 2020-067

1. Invitation

I would like to invite you to take part in my research study. Joining the study is entirely up to you, before you decide I would like you to understand why the research is being done and what it would involve for you. I will go through this information sheet with you, to help you decide whether or not you would like to take part and answer any questions you may have. I would suggest this should take about 10 minutes. Please feel free to talk to others about the study if you wish. Do ask if anything is unclear.

I am Keith Ditcham, an ex-Kent Police and NCA employee, who spent the vast majority of his service in investigation both within the UK and as an International Liaison Officer. I am pursuing a Professional Doctorate through the University of Portsmouth and am the only researcher on this project.

2. Study Summary

This study is concerned with child criminal exploitation in England and Wales, which is important because of how it has come to the fore as a contemporary issue through the county lines drug distribution model. I am seeking participants who are working in this subject area, from the police and the NCA as well as charities and other relevant agencies. Participation in the research would require you to agree to be interviewed, most likely remotely due to the current pandemic. I will take approximately one hour of your time.

3. What is the purpose of the study?

I am pursuing a Professional Doctorate through the University of Portsmouth. As part of my studies I am required to conduct a substantial research project and submit a written thesis of 50,000 words. The study
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

involves a mixture of literature analysis and the collection of primary data through interviews (more on this below). I hope through the conduct of a number of interviews to identify and evaluate a number of multi agency working arrangements paying particular attention to what factors might have an impact, i.e., funding, resources, and skillset. The purpose of the study is therefore two-fold. Firstly, to make a unique contribution to the field of study and secondly, to successfully meet the standard to be awarded the title of Doctor of Security Risk Management.

4. Why have I been invited?

You were chosen through XXX who has acted as an independent third party (a gatekeeper) as someone known to them who might be able to assist with the research given your role within your organisation and the responsibility you have in relation to dealing with child criminal exploitation. The study aims to interview a maximum of 30 persons from within the police service, the NCA and other agencies/organisations with knowledge of the subject area.

5. Do I have to take part?

No, taking part in this research is entirely voluntary. It is up to you to decide if you want to volunteer for the study. We will describe the study in this information sheet. If you agree to take part, we will then ask you to sign the attached consent form, dated February 2021 version number 1.

6. What will happen to me if I take part?

The research consists of a semi-structured interview (SSI). The length of time the interview will take place very much depends on how much information you have and are willing to share with me. As a rough approximation, I would have thought it would take approximately one hour. Due to current restrictions it is highly probable that the interview will be conducted over the telephone or using a medium such as Zoom, Teams or Skype and be recorded. The recording will be solely for the purposes of assisting me in writing up the findings from the research and will allow a free-flowing interview, more so than were I to make written notes. All material will be securely stored in a locked cabinet. I will destroy any such recordings once I have harvested the data.

I do not envisage you will be required further unless I need to clarify a point.

Only I know your identity. It will not appear in the research findings, nor will the name of your Force/organisation unless you give your written consent for this to happen. I have included more detail on how your identity will be protected in the section headed Will my data be kept confidential?

Lastly, there is a duty placed on researchers to share their knowledge. Therefore, it is highly probable that I will either publish the results of the research or at the very least share it with those with a relevant interest. In both cases, I wish to reassure you that there will be no requirement for your personal details to be included.

7. Expenses and payments

As the research will be conducted remotely I do not envisage that participants will incur travel or other related out of pocket expenses. Participants are kindly asked to give their time for free. Should you agree to participate in the research your contribution would be highly valued and I welcome and am grateful to you for the richness of data that you would bring to the research.

8. Anything else I will have to do?

N/a

9. What data will be collected and / or measurements taken?

The data to be collected will be your knowledge and experience of dealing with child criminal exploitation.
10. What are the possible disadvantages, burdens and risks of taking part?

None identified.

11. What are the possible advantages or benefits of taking part?

I cannot promise the study will directly help you as an individual but the information I get from the study will help to increase the understanding of the topic, it will raise its profile and hopefully lead to opportunities for enhanced performance, possibly through helping to attract further funding as well additional related research in this key area.

12. Will my data be kept confidential?

Yes, unless you inform me that you wish to be named and associated with your data, which will require you giving me written consent to that effect.

If you join the study, it is possible that some of the data collected will be looked at by authorised persons from the University of Portsmouth. Data may also be looked at by authorised people to check that the study is being carried out correctly. All will have a duty of confidentiality to you as a research participant and they will do their best to meet this duty.

- Your data will be collected in an interview.
- It will be stored securely. Your interview will be anonymous and given a research code, known only to myself as the researcher.
- A master list identifying participants to the research codes data will be held on a password protected computer accessed only by myself.
- Paper files and any tape recorded data (if applicable) will be stored in a locked cabinet, within locked premises. It can only be accessed by myself.
- Electronic data will be stored on a password protected computer, the password is known only to myself and regularly changed in line with standard security measures for keeping electronic data secure.
- The data will be primarily used for completion of the assignment set by the university.
- Anonymous data, which does not identify you, will be publicly shared at the end of the project and made open access. A CC-BY licence will be applied to this publicly shared data. This will allow anyone else (including researchers, businesses, governments, charities, and the general public) to use the anonymised data for any purpose that they wish, providing they credit the University and researcher as the original creators. For example, the data, when made anonymous, may be presented to others at academic conferences, or published as a project report, academic dissertation or in academic journals or books. No restrictions will be placed on this shared anonymised data limiting its reuse to only non-commercial ventures.
- The raw data, which would identify you, will not be passed to anyone outside the study team without your express written permission. The exception to this will be any regulatory authority which has the
legal right to access the data for the purposes of conducting an audit or enquiry, in exceptional cases. These agencies treat your personal data in confidence.

- The raw data will be retained for a minimum of 10 years. When it is no longer required, the data will be disposed of securely (e.g., electronic media and paper records / images).
- As the sole researcher, only I will have access to view identifiable data (authorised persons from the University of Portsmouth such as my supervisor may request access in order to monitor the quality of the research).
- All data will from research activities will be digitised and stored on the University of Portsmouth’s system (called University Electronic Data Management) for ten years before secure destruction in line with their published policy.
- As a participant you have the right to check the accuracy of data held about you and correct any errors.

13. What will happen if I don’t want to carry on with the study?

As a volunteer you can stop any participation in the interview at any time, or withdraw from the study at any time before the end of July 2021, without giving a reason if you do not wish to. If you do withdraw from a study after some data have been collected you will be asked if you are content for the data collected thus far to be retained and included in the study. If you prefer, the data collected can be destroyed and not included in the study. Once the research has been completed, and the data analysed, it will not be possible for you to withdraw your data from the study.

14. What if there is a problem?

If you have a query, concern or complaint about any aspect of this study, in the first instance you should contact the researcher(s) if appropriate. If the researcher is a student, there will also be an academic member of staff listed as the supervisor whom you can contact. If there is a complaint and there is a supervisor listed, please contact the Supervisor with details of the complaint. The contact details for both the researcher and any supervisor are detailed on page 1.

If your concern or complaint is not resolved by the researcher or their supervisor, you should contact the Head of Department: Paul.norman@port.ac.uk

If the complaint remains unresolved, please contact:  

The University Complaints Officer  
023 9284 3642  complaintsadvice@port.ac.uk

15. Who is funding the research?

This research is not funded by anyone other than the researcher himself.

16. Who has reviewed the study?

Research involving human participants is reviewed by an ethics committee to ensure that the dignity and well-being of participants is respected. This study has been reviewed by the Humanities and Social Sciences Faculty Ethics Committee and has been given favourable ethical opinion.

Thank you
Thank you for taking time to read this information sheet and for considering volunteering for this research.
CONSENT FORM

Title of Project: Child criminal exploitation in County Lines in England and Wales: challenges and controversies of dealing with a national problem at the local level

Name and Contact Details of Researcher(s): Keith Ditcham, icj90540@myport.ac.uk

Name and Contact Details of Supervisor (if relevant): Dr Leah Fox, leah.fox@port.ac.uk

University Data Protection Officer: Samantha Hill, 023 9284 3642 or data-protection@port.ac.uk

Ethics Committee Reference Number: FHSS 2020-067

1. I confirm that I have read and understood the information sheet dated January 2020 (version 2.7) for the above study. I have had the opportunity to consider the information, ask questions and have had these answered satisfactorily.

2. I understand that my participation is voluntary and that I am free to withdraw at any time prior to the analysis of the data I supply without giving any reason.

3. I understand that data collected during this study will be processed in accordance with data protection law as explained in the Participant Information Sheet (dated January 2020, version 2.7)

Please answer the following questions YES/NO
4. I consent for my interview to be audio recorded. The recording will be transcribed and analysed for the purposes of the research. Once the recording has been transcribed it will be deleted. Up to the time of deletion recordings will be kept in a locked filing cabinet to which only the researcher has access. Similarly, transcripts of the recording will be held on a password encrypted computer to which only the researcher has access.

5. I consent to verbatim quotes being used in publications; I will not be named but I understand that there is a risk that I could be identified.

6. I agree to the data I contribute being retained for any future research that has been given a favourable opinion by a Research Ethics Committee.

7. I understand that should I disclose any concerns with regard to my own, or others’ professional practice in the course of the interview, the researcher might be duty bound to refer the matter to relevant agencies.

8. I agree to be named as a participant and referred to accordingly.

9. I agree to take part in the above study.

Name of Participant: ___________________________ Date: ______________ Signature: ___________________________

Name of Researcher: Keith Ditcham Date: ______________ Signature: electronic

Note: When completed, one copy to be given to the participant, one copy to be retained in the study file.
Appendix F: Ethics Application and Approval

Application for Ethics Review – Staff and Postgraduate Students

1. Study Title and Key Dates

1.1 Title

Child criminal exploitation in England and Wales: challenges and controversies of dealing with a national problem at the local level

1.2 Key Dates

Date of original submission to ethics committee: 08/12/2020
Version number of original submission: v2
Ethics Committee Reference Number:

Intended Start Date of Data Collection: 01/01/2021
Expected Finish Date of Data Collection: 31/01/2022

When resubmitting an updated application (e.g., in response to ethics review, or an application for substantial amendment):

Date of resubmission to ethics committee: N/a
Version number of resubmitted documents: N/a

2. Applicant Details

2.1 Chief Investigator

Name: Mr. Keith Ditcham, student, undertaking the Professional Doctorate in Security Risk Management (DSyRM)
Department: ICJS Faculty: Humanities and Social Sciences
Telephone: +44 (0)7564 228501 Email: icj90540@myport.ac.uk

Has the chief investigator attended a training session in the graduate school (for students) or researcher development programme (for staff) on research ethics? No. Booked on the next available research ethics, integrity and
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

2.2 Supervisor (If Chief Investigator is a student or a research assistant)

Name: Dr Leah Fox Title /Role: Principal Lecturer in Criminal Investigation
Department: ICJS Faculty: Humanities and Social Sciences
Telephone: +44 (0)239 284 3911 Email: leah.fox@port.ac.uk

Names and email of any other supervisors:
Second Supervisor: Dr Moufida Sadok moufida.sadok@port.ac.uk
Third Supervisor: Dr Andy Williams andy.williams@port.ac.uk

Has the supervisor attended the researcher development programme research ethics training session (NB this is not mandatory)?

Y 23.05.2017

2.3 Others involved in the work/research including students and/or external collaborators (name, organisation/course, role in the project)

N/a

3. Details of Peer Review

The research proposal and the methodology employed has been peer reviewed by fellow students and teaching staff in a presentation made as part of the Publication and Dissemination course in February 2020. It was also reviewed by Marika Henneberg as a second marker to Dr Leah Fox when submitted for the assignment Proposal for Professional Research and Development Project in May 2020.

The feedback stated

- The background section was informative as it demonstrated awareness of the research area in which the research project is being situated.
- The aims and objectives of the proposed project were articulated clearly.
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

- The literature review section included the key areas for examination.
- The research methodology section was appropriately structured and demonstrated the engagement with the literature. It would have benefitted from an enhanced discussion on the method of analysis.
- The ethics section addressed the key ethical considerations.
- The key stages of the project life cycle were considered in great detail.

4. **Funding Details**

The researcher will be financially supporting their own work and is independent of external funding.

5. **Sites/Locations**

Given the restrictions imposed by Covid 19, for health and safety reasons and to also follow government and UoP guidelines no site visits are planned at this time with all research conducted remotely via telephone or via video link. This situation will be regularly reviewed and if it can be safely achieved, then consideration will be given to the conduct of face-to-face interviews in some cases. This will be subject to the additional considerations of logistics and expense of travel versus the perceived benefit and a clear articulation of why this would be preferable to conducting the interview remotely.

6. **Insurance/indemnity Arrangements**

Having reviewed the information available, the University of Portsmouth Insurance Policies are sufficient to cover the proposed research. Namely-

- Liability to research participants in most research studies is covered under the University’s Public Liability insurance.
- Legal Liability for breach of professional duty by reason of any negligent act or accidental error or omission is covered under the University’s Professional Indemnity Insurance.

The proposed research does not fall into the special categories listed requiring referral to the University’s insurers.

7. **Aims and Objectives/Hypothesis**
7.1 Aims

The research aims of this proposal are:

To understand how child criminal exploitation and vulnerability is constructed and understood in England and Wales by the police and some of the agencies with whom the police engage when dealing with criminally exploited children.

To establish how this understanding influences and shapes how the police and those agencies respond to criminally exploited children.

To understand the challenges and controversies the current response represents to both the police and the agencies with whom they work.

To identify opportunities for improvement to help enhance knowledge that can also be translated into practice. For example, the research seeks to establish whether there is a case for the adoption of a national response, whether the response should remain intrinsically local or whether a hybrid model that mixes both national and local responses could provide a framework for a standardised approach to help improve knowledge and understanding of the above issues with the potential to enhance overall performance in this area.

7.2 Primary Objective

With reference to the extant academic and grey literature, conceptualise CCE and vulnerability to identify what it means, where the understanding of CCE by the agencies and organisations overlaps or diverges, and how this understanding influences and shapes decision making and organisational response.

7.3 Secondary Objective(s)

- Through the conduct of interviews identify and evaluate a number of multiagency working arrangements to identify what other factors might have an impact. For example, funding, resources, organisational priorities and skills.
- Critically evaluate the above responses to CCE for their effectiveness (defining what this means for this study and universally applying the same criteria) to identify what works, in what circumstances and for whom.
- Conduct a meta-analysis of the relevant findings from both the primary and secondary data to identify where a coordinated national response and where a local response are the best means of improving the situation for vulnerable children and young persons, and what a refocusing of the current landscape might mean for policing and the organisations with whom they work.
8. Justification/Summary of Study (no more than one side)

The research conducted for the ART pilot study identified that invariably the term child criminal exploitation (CCE) is used to describe both a criminal act on a child, for example, as in child sexual exploitation (CSE), as well as an act where a child is forced or coerced into carrying out a criminal act, i.e., deliver drugs as in the case of the neologism County Lines. It is this more recent form of CCE, County Lines to which this research primarily refers. Profit maximisation and market control (Coomber & Moyle, 2018, p. 1338) are two of the defining features of the County Lines model that relies on criminal exploitation and child sexual exploitation (Becket et al., 2013) in order to achieve these twin goals. Chief Constable Shaun Sawyer, the National Police Chief’s lead for modern slavery recently described the level of CCE as nearing Victorian levels and a form of modern slavery that has overtaken sexual and labour exploitation (Dodd, 2020). With 88 per cent of all police forces in England and Wales reporting cases of CCE in the form of County Lines (NCA, 2017, p.8), this appears to represent a nationwide problem for the police and relevant authorities with whom they work. Despite this though there is a paucity of academic research in this area (Windle and Briggs, 2015), meaning that with the exception of National Crime Agency (NCA) assessments and media reporting little is known about the phenomena (Robinson McLean, and Densley, 2019, p.695). Although there has been some recent attention from some academics (e.g., Windle, Moyle and Coomber, 2020; Harding, 2020; Spicer, 2019; Andell & Pitts, 2018), there is a pressing need for more research indicating the nascent level of knowledge regarding this phenomenon. To date, the focus on child exploitation has almost exclusively concentrated on child sexual exploitation (CSE), modern slavery, human trafficking and organised immigration crime (NCA, 2019, p.11). These findings suggest that despite its prevalence, the understanding of County Lines as a form of CCE is not at an equitable level with these other crime types and given the pressure on police resources there is a danger that the subject does not receive the attention nor the resources the statistics above indicate it should.

What makes the County Lines drugs model different from other forms of drug supply is the use of vulnerable populations, i.e., children and young persons to distribute the drugs. Despite the fact that an increasing amount of the police’s time is spent in identifying and dealing with issues of vulnerability such as County Lines (House of Commons Home Affairs Committee, 2018), there is little evidence of a standard approach to the definition of vulnerability, nor its identification or understanding and this, it is argued has had a detrimental impact on policing responses. According to Coliandris (2015, pp. 27-28), the lack of a standard definition of a vulnerable person has resulted in a limited understanding of the concept of vulnerability within policing and consequently a lack of effective and sustainable responses delivered by the police and other agencies. The response to CCE from the agencies involved has been described as “very variable” across and within different geographical areas and organisations within the U.K (Hudek, 2018, p.2). This means that in one area a child is treated as a victim, in another as an offender (HMICFRS, 2017). On initial inspection, deciding a child’s fate based on geography and/or local organisational response is inconsistent and lacks fairness but it warrants further research to understand more fully. It is also argued that the current siloed approach to child criminal exploitation, child sexual exploitation, and County Lines hampers existing responses (Hudek, 2018, p.23). In particular, by focussing on these as single strand threats, there is a lack of clarity of understanding what works (Vulnerability Coordination Centre, n.d.). For example, one of the most frequently used police responses is the use of so-called ‘crackdown operations’ whereby large numbers of suspected dealers are arrested and often even larger numbers of vulnerable children are reported to be safeguarded. However, the effectiveness of such operations has been questioned by some academics who have described it as ‘symbolic policing’ (Bacon, 2016; Coomber, Moyle & Mahoney, 2017), indicating this may not be an effective tactic but without further research there is a lack of empirical data to support or contradict its effectiveness.

It is evident from the research conducted in the ART study that the subject would benefit from further research but on a larger scale than was possible due to the restraints of that assignment. This research hopes to make a unique and
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

9. Description of Method/ Protocol and Risks

9.1 Please describe your main method(s) or describe your protocol here, although ensure you do not replicate sections 11, 12 or 13.

In order to answer the research question ‘What are the challenges and controversies of dealing with child criminal exploitation in England and Wales, a national problem at the local level?’, the experience of the ART assignment confirmed this type of study requires use of the qualitative paradigm. One of the main reasons is because sound descriptive analysis is of more benefit to policy makers than experimental or quantitative approaches (Lösel, 2008, p.153) and one of the objectives of this research is to influence policy and practice in addition to contributing to the extant knowledge on the phenomenon of CCE.

A constructionist approach in its ontological research philosophy will be adopted as the researcher hopes to construct meaning through the interpretation of the words of the research participants, with theory generated in an inductive process rather than through use of data to test an extant theory, as explained in the academic literature (e.g., Cresswell, 2003, p.9; Bryman, 2012, p.710; Ormston, Spencer, Barnard, & Snape, 2014, p. 12).

Epistemologically the position adopted by the researcher will be interpretivist as opposed to positivist. This is because the aim of the research is to focus on the interactions of a group of participants in order to establish how social phenomena, here CCE, occur using a qualitative approach (Silverman, 2013, p.9). In order to meet the aims of the research as articulated above, it will be necessary to interpret the understanding and interactions of the participants. These participants are drawn from law enforcement as well as other agencies and charities with whom they work.

By adopting an interpretivist research philosophy, the researcher hopes to answer the what and how questions set out in the research aims without reference to predefined variables (Silverman, 2013, p.18). Namely, how child criminal exploitation is constructed and understood in England and Wales by the police and some of the agencies with whom the police engage. To establish how this understanding influences and shapes how the police and those agencies respond. To understand what are the challenges and controversies the current response represents to both the police and the agencies with whom they work, and to establish what the implications for future practice would be of adopting a more nuanced approach to child criminal exploitation, examining whether there is a case for the...
adoption of a national response, whether the response should remain intrinsically local or whether a hybrid model mixing both national and local responses might provide a better response.

Semi-structured interviews will be used as the main research method as they offer more flexibility than the more rigid design of a structured interview. In this case when answering questions, respondents can give as much detail as they want and the researcher can ask them to amplify their response(s) where necessary in order to elicit additional information as suggested in the literature (e.g., Bryman, 1989, p.124; Gray, 2017, pp. 215-217).

Appendix A contains the interview schedule. These questions have been reviewed by Dr Leah Fox as well as Tony Saggers, a consultant on CCE (see 11.1) and amended in line with their recommendations and comments.

9.2 Anticipated Ethical Issues

Autonomy

The information sheet (Appendix B) details participant’s right to choose, that there is no obligation to take part in the study, and that they do not have to answer every question. The researcher does not have a relationship with any of the anticipated participants in this research. A gatekeeper, acting as an independent third party, has accepted the responsibility to identify potential respondents. It is entirely up to that potential respondent whether they chose to contact the researcher and whether they agree to take part in the study. As the researcher will not know their identity until they make contact this will protect their autonomy. After describing the study and what is required, potential participants will be asked whether they wish to voluntarily take part in the research. Both the invitation letter (Appendix C) and Participant information sheet (Appendix B) stress that participation is voluntary.

Non-maleficence

The research data will not be used to compare performance in one police force or agency or by one individual against another. The data is property of the UoP and cannot be used for any other purposes than prescribed in this ethical review application.

Beneficence

There are no direct benefits to participants coming from participation in the research. This point is made clear in the Participant Information Sheet (Appendix B).

Justice

Although the research population will be drawn largely from practising police officers, they will not be asked to disclose any material subject of jurisprudence or that could potentially compromise an ongoing investigation.

9.3 Anticipated other Risks or Concerns
### Have all risk assessments as required by relevant Health and Safety policies been completed?

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### Risks to participants:
The research pool consists of serving police officers and other organisations’ staff with experience in dealing with child criminal exploitation and in particular, vulnerable persons. The research asks questions about their experiences to date rather than expose participants to new information that might have a detrimental effect on their psychological well being. Nonetheless, respondents will be offered the opportunity to talk through any concerns with a professional person, either within their own organisation in the first instance where one exists or through the NHS. The NHS website [www.nhs.uk/conditions/counselling](http://www.nhs.uk/conditions/counselling) offers guidance on how to access services either through the NHS or privately.

### Risks to researchers:
The researcher is an experienced investigator having served for 32 years in the police and NCA. Whilst some details of how County Lines exploits vulnerable persons may be uncomfortable to hear they will not be anything that he has not encountered before in his time as a Senior Investigating Officer responsible for murder investigations and other investigations involving, *inter alia*, serious sexual assault, serious injury, kidnap, extortion and other forms of exploitation and coercive behaviour.

### Reputational risks:
The research is not intended to be critical of any organisation. In order to protect organisational identity, in addition to that of the participant all responses will be anonymised and the identity of the individual as well as any material that could lead to their identification or that of their organisation will be sanitised to remove any likelihood that they could be identified. In the unlikely event that this cannot be satisfactorily achieved then the data will not be used.

Whilst conducting the research the researcher will remain cognisant that they represent the University of Portsmouth and will conduct themselves accordingly, maintaining the highest ethical standards as well as remaining courteous and fair-minded in all their dealings with others.

### Security risks:
None of the data will be at a level that requires handling under the Government Protective Marking Scheme. Sensitive law enforcement data and other personal data will not be sought, nor used. Results of criminal cases, where appropriate, will be taken from publicly available sources and identities of convicted persons only used where this is a matter of public record.

### 9.4 Medical Cover (if applicable)

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### 10. Compliance with Laws, Codes, Guidance, Policies and Procedures
The research will comply with all legal requirements and in particular, the Data Protection Act 2018 and GDPR.

The researcher works for RUSI, an independent Think Tank where all research is subject to ethical review. He is a standing member of RUSI’s Ethical Review Committee and has undertaken relevant in-house training.

The researcher has also previously submitted successful ethical applications to UoP for the ART Assignment in 2019 and Master’s Degree in 2011.

11. Recruitment of Participants

11.1 Who are the Research/ Participant Population?

- Professor Ross Coomber, University of Liverpool and Professor Simon Harding, University of West London and Director of the National Centre for Gang Research have agreed to act as ‘key informants.’ Both have published extensively on the subject of County Lines and more generally on drug markets. The advantages of using a ‘key informant’ in the study is that they enable the researcher to obtain quality data in a shorter time frame than were they to interview a larger number of respondents and this should prove particularly valid when used in conjunction with other qualitative methods (Marshall, 1996, p.96). ‘Key informants’ can also help facilitate the researcher’s access into areas where they have none, help translate findings and usefully serve as a check on information obtained (Rieger, 2007, cited by Ritzer, 2013, p. 92).
- Tony Saggers, a former NCA employee as head of Drugs Threats and ‘expert evidence’ consultant with relevant experience who currently offers training in recognising and responding to County Lines. Tony was a participant in the ART pilot study and has agreed to act as Gatekeeper providing access to a rich source of contacts from relevant agencies including the organisations listed below.
- Officers from Police Forces in England and Wales as well as from the NCA. Pool size anticipated to be between 15-30 participants.
- Local Authority, youth and charity workers (some of whom were participants in the ART assignment) that work with the police and other agencies in dealing with CCE.

11.2 Inclusion/Exclusion Criteria

Inclusion Criteria:

- Those with a practical knowledge in the relevant field and dealing with CCE or have been working in this area with recent knowledge and experience such as the police, NCA (especially the National County Lines Coordination Centre), local authorities, social workers, youth workers, charities such as St. Giles Trust and education.
- Participants from the police and a charity worker who have already indicated their interest in participating further in the research from when the researcher conducted the ART pilot study. Their knowledge and experience of ‘what works’, projects aimed at safeguarding vulnerable children and contacts would be extremely useful to this research.
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

- Those with an academic knowledge of the subject matter to be used as ‘key informants.’ Their role in research is explained in section 11.1 above but for this research it is envisaged that in addition to their specialist knowledge they will most usefully facilitate access to relevant participants they have encountered in the course of their own research.

**Exclusion Criteria:**

- Those whose experience is not relevant to the study, i.e., not related to experience of CCE in England and Wales
- Anyone with a vested interest in pursuing their own agenda for commercial reasons or to promote their own exposure.

### 11.3 Number of participants (include rationale for sample size)

See answer to 11.1 above for further details.

No sample size has been selected at the outset. Rather the sample size will be determined by saturation; the point where no new information or themes are identified in the data. The exact number for this study depends on the richness of the data from the respondents rather than the number of respondents but as a guide it has been identified that in one study this number was as low as 12 interviews (Guest, Bunce and Johnson, 2006).

### 11.4 Recruitment Strategy (including details of any anticipated use of a gatekeeper in host organizations to arrange/distribute participant invitations)

A gatekeeper will be used to grant independent access to potential respondents to speed up the recruitment process through negotiation directly with potential participants and will act as guarantor of the researcher’s legitimacy within the pool of potential participants (de Laine, 2000). The use of a gatekeeper for research that involves sensitive subjects has been shown to be particularly useful (Eide & Allen, 2005). The proposed research is focussed on the criminal exploitation of children (albeit no children or young persons will be direct participants to the research) and would appear to fit that description supporting the use of a gatekeeper. The gatekeeper (see section 11.1) is someone who through their role has daily access to potential respondents in law enforcement and relevant partner agencies. His confirmatory email is attached at Appendix E along with those of the key experts together with a sample of police, National County Lines Coordination Unit and other agency staff.

The sampling strategy will include a number of participants from the ART assignment who indicated their willingness to contribute to the thesis research during their interviews. This pool includes the police and charity workers. Their willingness was recorded in the interview notes but as those notes are confidential they are not appended to this ethics application. Nonetheless the participants will still be required to give their written consent to participate in this research, as is the case for all respondents.

The researcher will also use snowball sampling by requesting, where appropriate, one respondent provides the name of another they know who may have relevant information and so on (Vogt, 2005, p. 300). This method has been shown...
to be particularly useful in research in marginalised groups where it may prove difficult to obtain a representative sample (Cohen and Arieli, 2011, pp. 426-7). The ART assignment highlighted the limited number of policing and multiagency resources dedicated to dealing with CCE and would appear to fit the description of a marginalised group.

11.5 Payments, rewards, reimbursements or compensation to participants

There are no plans to pay participants for their time or contribution to the research. It would be reasonable to reimburse participants for any out of pocket expenses incurred but due to Covid 19 it is envisaged the interviews will be conducted remotely and therefore there will be no travel or other associated expenses incurred.

11.6 What is the process for gaining consent from participants?

In accordance with the principles of giving informed consent (Israel & Hay, 2006, p.60) to assist potential respondents in deciding whether to participate in the research they will be fully informed about the study, its aims and objectives, what their participation would actually involve, and any other relevant information so that they might make a reasoned and informed decision as to whether they wish to participate. There will be no pressure applied nor detriment, implied or actual, in declining to participate. Consent will be voluntary and participants will be informed of their right to withdraw their consent at any stage prior to analysis of the data. Prior to giving their consent to the study all potential respondents will be provided with an invitation letter (Appendix C), participation information sheet (Appendix B) and consent form (Appendix D). Potential respondents will be additionally sent a copy of the interview schedule (Appendix A). This has two benefits. Firstly, it ensures that potential participants have all the information available to be able to make an informed decision and secondly, if they give their consent, time to prepare their answers to the questions.

Potential participants will be given a period of two weeks to consider the above information and then asked to forward completed consent forms prior to the arrangement of a mutually convenient time to conduct the interview.

Should the researcher receive a request for feedback, the participant’s consent to use their contact details for this purpose will be obtained. All communication will be conducted using the researcher’s university email address.

11.7 Has or will consent be gained from other organisations involved (if applicable)?

Staff from charities as well as officers from police forces and others will need to have the consent of their parent organisation to participate in the research. This will be ensured either by requiring the participant to forward an email or other written communication that covers this point or to furnish a contact point where the researcher can check and confirm the consent.

Save for when permission has been given in writing, in order to protect the confidentiality of respondents, data that is not already in the public domain will only be used providing it can be sufficiently anonymised so that it does not identify the person who gave it nor their organisation. Additionally, no data will be used if it is likely to identify names/locations/personal data. The type of data sought does not include sensitive material that would normally attract a classification under the Government’s Protective Marking Scheme.

11.8 Arrangements for translation of any documentation into another language (if applicable)?
11.9 Outline how participants can withdraw consent (if applicable), and how data collected up to this point will be handled. Also stop criteria for specific tests (if applicable)?

- Upon receipt of a request from the participant, they will be free to withdraw from the study at any time up to the point of the data being analysed. An explanation of this point is included in the participation information sheet (Appendix B).

- If on the decision of the researcher (and / or supervisor) it is believed the research is causing or is likely to cause physical or mental distress to the respondent then their participation will cease. They will be referred to an appropriate person or organisation professionally qualified to deal with such distress (see 9.3 Anticipated other Risks or Concerns).

11.10 Outline details of re-consent or debrief (if applicable)?

N/A

12. Data Management

12.1 Description of data analysis

The data (both primary and secondary) will be analysed using a thematic model, such as that identified by Braun & Clarke (2006) supported through the use of NVivo. The model was chosen as a useful tool that assists the researcher to remain theoretically flexible and to identify data-sets, categorisation, and grouping into themes and patterns that can then be cross-referred to identify recurring themes and patterns as well as latent meanings (Ryan & Bernard, 2000). The results of the data analysis will help identify key emergent themes that fulfil the aims of the research and assist in answering the research question.

12.2 Where and how will data be stored DURING the project?

- The interview data will be recorded on a portable device and will be transferred as soon as practicable to a password protected computer to which only the researcher has access. The researcher will periodically back up all research data to an encrypted external hard drive to which they are the only user. Prior to use of the above mentioned recording device participants will be asked if they consent to its use. Where no such consent is forthcoming then contemporaneous notes will be made.
Paper files and any tape recorded data (if applicable) will be stored in a locked cabinet, within secured and locked premises that can only be accessed by the researcher.

Electronic data will be stored on a password-protected computer; the password is known only to the researcher and regularly changed in line with standard security measures for keeping electronic data secure. If a pen drive is used it will be encrypted and data transferred to a more secure password protected computer at the earliest opportunity in accordance with the guidelines.

12.3 Destruction, Retention and Reuse of Data (often AFTER your project has finished)

- The results of the research will be made publicly available, either through access to the thesis itself or from the publication of academic journal(s) stemming from it. There are no ethical, legal or contractual reasons not to do so.
- Nothing in the above sentence should be taken to mean that access to raw data will be granted. In order to protect confidentiality raw data will not be made Open Access (OA).
- As previously stated, save for where a participant has given their written consent all identities will be anonymised and any data that could potentially lead to their identification as a participant removed. Personal data will not be shared. Despite these considerations, permission to share data will still be sought from the (anonymised) source of the data.
- The data will be deposited using a recognised, accredited subject or disciplinary international or national repository. In the unlikely event that no such repository is identified, then as an absolute minimum the research will be shared on Portsmouth Research Portal (Pure). It will be stored in a format suitable for long-term preservation, i.e., pdf format. A CC BY licence will be applied to the data so that it can be reused whilst ensuring I am accredited as the source of the data.
- All data from research activities will be digitised and stored on the University of Portsmouth’s N drive for a minimum period of ten years before secure destruction in line with their published policy (or depending on which repository is used their retention period, whichever is longest).
- Personal data will be deleted at the request of the participant and in any case once the data is no longer needed to achieve the aims of this research.

12.4 Personal Data – How will confidentiality be ensured?

- Personal data will be treated in accordance with the General Data Protection Regulations (GDPR).
- The interviewees identity will be made anonymous and given a unique code, known only to the researcher who will assign the participant a unique identifying number or letter and refer to them throughout the study only using this nomenclature.
- A master list identifying participants to the research codes data will be held on a password protected computer to which only the researcher has access.
The researcher will need the respondent’s email address in order to send the Invitation letter (Appendix C), participation information sheet (Appendix B) and consent form (Appendix D). They may also need a telephone number in order to conduct the interview. All such data will be stored securely as detailed above.

There is no requirement or need to collect special categories of personal data as defined.

When writing-up the research for publication unless the respondent has given their written consent to reveal their identity, the researcher will not use their name nor will they make use of any material that could potentially identify the person. This includes, but is not limited to, their name, area of work, a particular case with which they are known to be associated or other material where only they could possibly be the participant.

12.5 How will data belonging to organisations (publicly unavailable data) be handled (if applicable)?

The research will not identify organisations nor will it seek to use confidential data.

12.6 How will security sensitive data be handled (if applicable)?

There is no need to collect or seek security sensitive data to achieve the aims of this research.

13. Publication / Impact / Dissemination Plans

As previously described in section 12.3 the researcher intends for the results of the research to be made publicly available. This will be through access to the thesis itself, deposited using a recognised, accredited subject or disciplinary international or national repository, as well as through the publication of academic journal(s) stemming from the it. Any such journal article(s) will be made OA.

There are no funders or sponsors of this research and therefore no foreseeable embargoes in place.

14. References


NCA. (2019a). *National Strategic Assessment of Serious and Organised Crime*.


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15. Appendices

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16. Declaration by Chief Investigator and Supervisor (if applicable)

BY SUBMITTING THIS FORM TO YOUR FACULTY ETHICS COMMITTEE THE CHIEF INVESTIGATOR (AND THEIRSUPERVISOR IF RELEVANT) DECLARE:

1. The information in this form is accurate to the best of my/our knowledge and belief and I/we take full responsibility for it.
2. I/we undertake to conduct the research/ work in compliance with the University of Portsmouth Ethics Policy, UK Concordat to Support Research Integrity, the UKRIO Code of Practice and any other guidance I/we have referred to in this application.
3. I/we confirm that all relevant risk assessments and Health and Safety requirements have been made/met.
4. If the research/ work is given a favourable opinion I/we undertake to adhere to the study protocol, the terms of the full application as finally reviewed and any conditions set out by the Ethics Committee in giving its favourable opinion.
5. I/we undertake to notify the Ethics Committee of substantial amendments to the protocol or the terms of the final application, and to seek a favourable opinion before implementing the amendment.
6. I/we undertake to submit annual progress reports (if the study is of more than a year’s duration) setting out the progress of the research/ work, as required by the Ethics Committee.
7. I/we undertake to inform the Ethics Committee when the study is complete and provide a declaration accordingly.
8. I/we am/are aware of my/our responsibility to be up to date and comply with the requirements of the law and relevant guidelines relating to security and confidentiality of personal data, including the need to register, when necessary, with the appropriate Data Protection Officer. I/we understand that I/we am/are not permitted to disclose identifiable data to third parties unless the disclosure has the consent of the data subject.
9. I/we undertake to comply with the University of Portsmouth Data Management Policy.
10. I/we understand that records/data may be subject to inspection by internal and external bodies for audit purposes if required.
11. I/we understand that any personal data in this application will be held by the Ethics Committee, its Administrator and its operational managers and that this will be managed according to the principles established in the Data Protection Act 1998 (and after May 2018, the General Data Protection Regulation).
12. I understand that the information contained in this application, any supporting documentation and all correspondence with the Ethics Committee and its Administrator relating to the application:
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

- Will be held by the Ethics Committee until at least 10 years after the end of the study
- Will be subject to the provisions of the Freedom of Information Acts and may be disclosed in response to requests made under the Acts except where statutory exemptions apply.
- May be sent by email or other electronic distribution to Ethics Committee members.

13. I/we understand that the favourable opinion of an ethics committee does not grant permission or approval to undertake the research/ work. Management permission or approval must be obtained from any host organisation, including the University of Portsmouth or supervisor, prior to the start of the study.

EMAILING THIS FORM TO THE RELEVANT FACULTY EMAIL ADDRESS WILL BE CONSIDERED AS AGREEING WITH THIS DECLARATION. IF YOU ARE A STUDENT PLEASE ENSURE THAT YOUR SUPERVISOR ALSO AGREES TO THIS DECLARATION.

Agreed to this declaration: Dr Leah Fox (First supervisor), 04/12/2020
FAVOURABLE ETHICAL OPINION (with conditions and advisory notes)

Name: Keith Ditcham

Study Title: Child criminal exploitation in England and Wales: challenges and controversies of dealing with a national problem at the local level

Reference Number: FHSS 2020-067

Date: 18/01/2021

Thank you for submitting your application to the FHSS Ethics Committee.

I am pleased to inform you that FHSS Ethics Committee was content to grant a favourable ethical opinion of the above research on the basis described in the submitted documents listed at Annex A, and subject to standard general conditions (See Annex B). With this there are a number of ethical conditions to comply with, and some additional advisory notes you may wish to consider, all shown below.

The panel agreed that this is a thoughtful and comprehensive proposal; it is both thorough and well considered. The background, the aims and objectives, and the methodology are clearly outlined, and the potential risks identified and addressed. We were also particularly impressed with the evidence provided for the peer review process, which was helpful for the committee.

We would however like to address a number of issues under the following five conditions, which the researcher needs to consider prior to full approval. There are also a few advisory notes.

Condition(s)1

Anonymity
1. Please ensure that participants understand that their anonymity in interviews is protected as much as possible
   - See the Consent form, part 5: ‘I understand that there is a risk that I could be identified.’
   While risks to participants have been carefully considered, including how the anonymity of participants is maintained, we suggest adjusting ‘…there is a minimal risk…’. This reflects that all necessary steps have been taken to protect anonymity of participants.

2. Please ensure that the anonymity of individuals referred to in interviews is protected.
   - Risks to individuals talked about by the participants in the interviews have not been considered. It is important that information that can identify any individuals is anonymised.

---

1 A favourable opinion will be dependent upon the study adhering to the conditions stated, which are based on the application document(s) submitted. It is appreciated that Principal Investigators may wish to challenge conditions or propose amendments to these in the resubmission to this ethical review.
Data management
3. Please reconsider the data storage method and opt for an online storage location recommended by the University.
   - 12.2 states: ‘The interview data will be recorded on a portable device and will be transferred as soon as practicable to a password protected computer to which only the researcher has access. The researcher will periodically back up all research data to an encrypted external hard drive to which they are the only user.’ Researchers are required to use one of the online storage locations the University recommends: https://library.port.ac.uk/researchdata.html#Data_storage_and_securityWhilst_my_research_project_is_taking_place.

   - This is also the case for personal data stated in 12.4: ‘A master list identifying participants to the research codes data will be held on a password protected computer to which only the researcher has access.

   ‘The researcher will need the respondent’s email address in order to send the invitation letter (Appendix C), participation information sheet (Appendix B) and consent form (Appendix D) They may also need a telephone number in order to conduct the interview. All such data will be stored securely as detailed above.’

Repository of data
4. Please ensure that there is consistency in your description of the retention and reuse of data (12.3).
   - The panel did not regard this statement as problematic: ‘The data will be deposited using a recognised, accredited subject or disciplinary international or national repository. In the unlikely event that no such repository is identified than as an absolute minimum the research will be shared on Portsmouth Research Portal (Pure). It will be stored in a format suitable for long-term preservation, i.e., pdf format. A CC BY licence will be applied to the data so that it can be reused whilst ensuring I am accredited as the source of the data.’

   - This plan appears in contradiction to this sentence from 12.3 however: ‘Nothing in the above sentence should be taken to mean that access to raw data will be granted. In order to protect confidentiality raw data will not be made Open Access (OA).’

5. Please ensure that personal data is not shared unless explicit consent is given.
   - 12.3 states: ‘Personal data will be deleted at the request of the participant and in any case once the data is no longer needed to achieve the aims of this research.’ This should be the other way around. Personal data must not be shared unless explicit consent is given. See ‘Sharing personal data’: https://library.port.ac.uk/researchdata.html#Data_storage_and_securityWhilst_my_research_project_is_taking_place.

Advisory Note(s)
1. It appears that the main focus is on child exploitation and County Lines to which this research primarily refers (Section 8, p. 4, and in Participant Information sheet and Invitation letter). The panel was wondering if this should not also be reflected in the title to make it SMART-er?

2. While the interview questions were thoughtful and probing, the panel was wondering if the researcher was to rely exclusively on the interview data. Regarding local and

   The comments are given in good faith and it is hoped they are accepted as such. The PI does not need to adhere to these, or respond to them, unless they wish to.

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national responses, we would advise not to only rely on participants' opinions and observations but also to analyse governmental guidelines, policy, legislation.

Please note that the favourable opinion of FHSS Ethics Committee does not grant permission or approval to undertake the research work. Management permission or approval must be obtained from any host organisation, including the University of Portsmouth or supervisor, prior to the start of the study.

Wishing you every success in your research.

Chair
Dr Brigitte Leucht
Email: ethics-fhss@port.ac.uk

Annexes
A - Documents reviewed
B - After ethical review

ANNEX A - Documents reviewed
The documents ethically reviewed for this application

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ANNEX B - After ethical review
1. This Annex sets out important guidance for those with a favourable opinion from a University of Portsmouth Ethics Committee. Please read the guidance carefully. A failure to follow the guidance could lead to the committee reviewing and possibly revoking its opinion on the research.

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2. It is assumed that the work will commence within 1 year of the date of the favourable ethical opinion or the start date stated in the application, whichever is the latest.

3. The work must not commence until the researcher has obtained any necessary management permissions or approvals – this is particularly pertinent in cases of research hosted by external organisations. The appropriate head of department should be aware of a member of staff's plans.

4. If it is proposed to extend the duration of the study beyond that stated in the application, the Ethics Committee must be informed.

5. Any proposed substantial amendments must be submitted to the Ethics Committee for review. A substantial amendment is any amendment to the terms of the application for ethical review, or to the protocol or other supporting documentation approved by the Committee that is likely to affect to a significant degree:
   
   (a) the safety or physical or mental integrity of participants
   (b) the scientific value of the study
   (c) the conduct or management of the study.

   5.1 A substantial amendment should not be implemented until a favourable ethical opinion has been given by the Committee.

6. At the end of the work a final report should be submitted to the ethics committee. A template for this can be found on the University Ethics webpage.

7. Researchers are reminded of the University's commitments as stated in the Concordat to Support Research Integrity viz:

   - maintaining the highest standards of rigour and integrity in all aspects of research
   - ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards
   - supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers
   - using transparent, robust and fair processes to deal with allegations of research misconduct should they arise
   - working together to strengthen the integrity of research and to reviewing progress regularly and openly.

8. In ensuring that it meets these commitments the University has adopted the UKRI Code of Practice for Research. Any breach of this code may be considered as misconduct and may be investigated following the University Procedure for the Investigation of Allegations of Misconduct in Research. Researchers are advised to use the UKRI checklist as a simple guide to integrity.
Appendix G: Data Analysis Codes, Sub-Themes and Main Themes

G.1 Mind Map 1 Initial Coding

Figure G.1: mind map initial. V1
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

G.2 Mind Map 2 Refining

Figure G.2: mind map intermediate. V2

G.3 Mind Map 3 Final

Figure G.3: mind map final. v3
Appendix H: Research Ethics Review Checklist
Child Criminal Exploitation (CCE) in County Lines in England and Wales: Challenges and Controversies of Dealing with a National problem at the Local Level

Thesis end