



PROCEDURES AND GUIDANCE

Brief Guidance and Flowchart

Criminal Exploitation, County Lines and Modern Day Slavery

Date of original document	August 2018
Date document reviewed	August 2019
	April 2021
Date for next review	Dec 2022



East Riding Brief Guide

Criminal Exploitation, County Lines and Modern Day Slavery

Criminal Exploitation

Criminal exploitation of children and vulnerable young adults is a geographically widespread form of harm. It is a term used to describe the targeting and exploitation of children who are groomed, threatened, manipulated or coerced into criminal activity. This can include money laundering, possession, supply and/or cultivation of drugs facilitated by gangs or organised criminal networks and sometimes in the form of county lines activity.

Children that are being criminally exploited are often exposed to high levels of harm including physical, sexual, and emotional harm. Criminal exploitation can often take place outside the home, such as at school, local neighbourhood, shopping centre or online via different social media platforms.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more targeted 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. They will often use coercion, intimidation, violence (including sexual violence) and weapons. [Serious Violence Strategy, HO 2018]

Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’.

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

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

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults;

- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Mode of Operation

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a young person who engages in county lines activity to stop someone carrying out a threat to harm his/her family.

Current Situation

The national picture on county lines continues to develop but there are recorded cases of:

- Children as young as 12 years old being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.
- Class A drug users being targeted so that gangs can take over their homes (known as 'cuckooing').

We do know that county lines exploitation is widespread, with gangs from big cities including London, Manchester, Liverpool and other major cities operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability include:

- Having prior experience of neglect, physical and/or sexual abuse; Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Social isolation or social difficulties;

- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other people involved in gangs;
- Having a physical or learning disability;
- Having mental health or substance misuse issues;
- Being in care (particularly those in residential care and those with interrupted care histories).

Signs to look out for

A young person's involvement in county lines activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them. Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts /phone calls
- Relationships with controlling /older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

Practitioners who have raised concerns around child criminal exploitation should adhere to the ERSCP safeguarding process and contact their designated safeguarding lead within their organisation.

The ERSCP Safeguarding Procedures can be found at: www.erscp.co.uk

Modern Slavery encompasses:

1. Human trafficking
2. Slavery, servitude and forced or compulsory labour

From 31 July 2015, in all UK referrals, the Competent Authority (trained decision makers) must consider whether the person is a victim of human trafficking. In England and Wales, if someone is found not to be a victim of trafficking, the Competent Authority must go on to consider whether they are the victim of another form of modern slavery, which includes slavery, servitude and forced or compulsory labour.

The NRM grants a minimum 45-day reflection and recovery period for victims of human trafficking or modern slavery. Trained decision makers decide whether individuals referred to them should be considered to be victims of trafficking according to the definition in the Council of Europe Convention. In England and Wales, further consideration is made to those who do not meet the definition of trafficking. Their cases are then considered against the definitions of slavery, servitude and forced or compulsory labour.

Potential victims of trafficking are likely to be extremely vulnerable. They may fear revealing their status or experiences to state authorities and will often mistrust individuals in authority. Their ability to participate in any future proceedings, for example as a witness, will depend largely on their psychological, emotional and physical health.

If you suspect that someone is a potential victim of modern slavery or just feel that *'something is not quite right'* you should report the matter. Act quickly as victims can be moved out of the area. Appendix A outlines the generic referral processes.

Submitting a referral to the National Referral Mechanism (NRM) for a child

What is the National Referral Mechanism (NRM)?

The National Referral Mechanism is the national framework for identifying and referring victims of modern slavery and ensuring they receive the appropriate support. The Single Competent Authority (SCA) administers it, which is part of the Home Office.

What is a 'First Responder?'

The people who can make a referral to the NRM are known as 'first responders'. Within the NRM, a number of organisations and public bodies are designated as '**first responders**'. The Police and Local Authorities are both designated as first responders.

When do I notify the Home Office?

If you have '**a reasonable cause to believe that you may have encountered a victim of Modern Slavery**' then you must notify the Home Office.

There are two elements to consider:

1. The fact at you **may** have encountered a victim of Modern Slavery. You do not need to know, believe or have any evidence, suspicion alone will suffice.

2. Modern Slavery is a **serious crime** and victims are likely to suffer or have suffered **significant harm**. The information in the notification to the Home Office should therefore reflect the gravity of these concerns.

How do I notify the Home Office?

All referrals must be submitted online. This should be used for **ALL** children (under 18).

- <https://www.modernslavery.gov.uk/start>

NB. You will only have 1hr to submit the referral, so it is useful to have all the information you need before you start.

How do I complete an NRM referral?

An NRM referral is the starting point of an investigation of a serious criminal offence by the Police. Time and care should be taken when completing

If you are a first responder, you should also refer any young person you **suspect of being a potential victim of trafficking** to the National Referral Mechanism (NRM). **If you are an ERYC member of staff then you must also notify the Council's lead Officer for Modern Slavery.**

What will the SCA do with my notification?

Stage I – The Reasonable Grounds decision:

Upon receipt of an NRM notification, the SCA has 5 working days to reach a 'Reasonable Grounds' decision. The threshold for this decision is:

"I suspect but cannot prove that the person is a victim of Human Trafficking, Slavery, Servitude and Forced or Compulsory Labour"

If a 'Positive Reasonable Grounds' decision is reached, there is enough information to investigate.

Once a decision has been made, the police force in the area where the crime has been committed will be alerted by the SCA, and a crime will be recorded and investigated by the police to establish, whether or not the child is the victim of modern slavery.

(Remember: the NRM runs alongside established safeguarding processes, it does not replace them).

The investigating officer will be provided with the contact details of the person who submitted the notification and is expected to liaise with them around how to best engage the young person and obtain any updates that might be helpful for the investigation.

Stage 2 – Conclusive Grounds Decision

After the SCA have completed their investigation, they will make a final decision. If it is decided that 'on the balance of probabilities', there is sufficient information to decide that the individual is a victim of modern slavery; a 'Conclusive Grounds' decision will be made.

A Conclusive Grounds decision provides official recognition (based on the civil burden of proof), that a child is/was a victim of exploitation at that 'moment of time'. It does not confer any other automatic rights or benefits.

Information for Practitioners

Advice and Help

ERYC Contextual Safeguarding
Advisor

Helen Jones-Brown
01482 393430
CE.response@eastriding.gov.uk

Housing and Safe Communities

Geoff Mann
01482 396120
geoffrey.mann@eastriding.gov.uk

Safeguarding issues

ERYC Children's
Safeguarding Hub
SaPH

01482 395500
(Out of hours 01482 393939)

Adults Safeguarding Team

01482 396940
safeguardingadultsteam@eastriding.gov.uk

Humberside Police

Non-emergencies 101
Emergencies 999

Modern Slavery Advice and Notification

ERYC Corporate Lead Officer
Modern Slavery

Paul Abbott
01482 396100
Paul.Abbott@eastriding.gov.uk

If you feel that there is an immediate risk to an individual, please contact the emergency services by dialling 999

