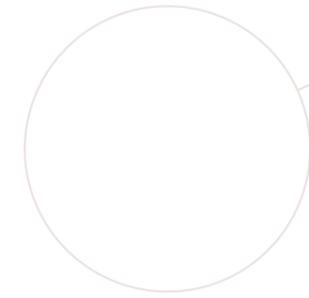


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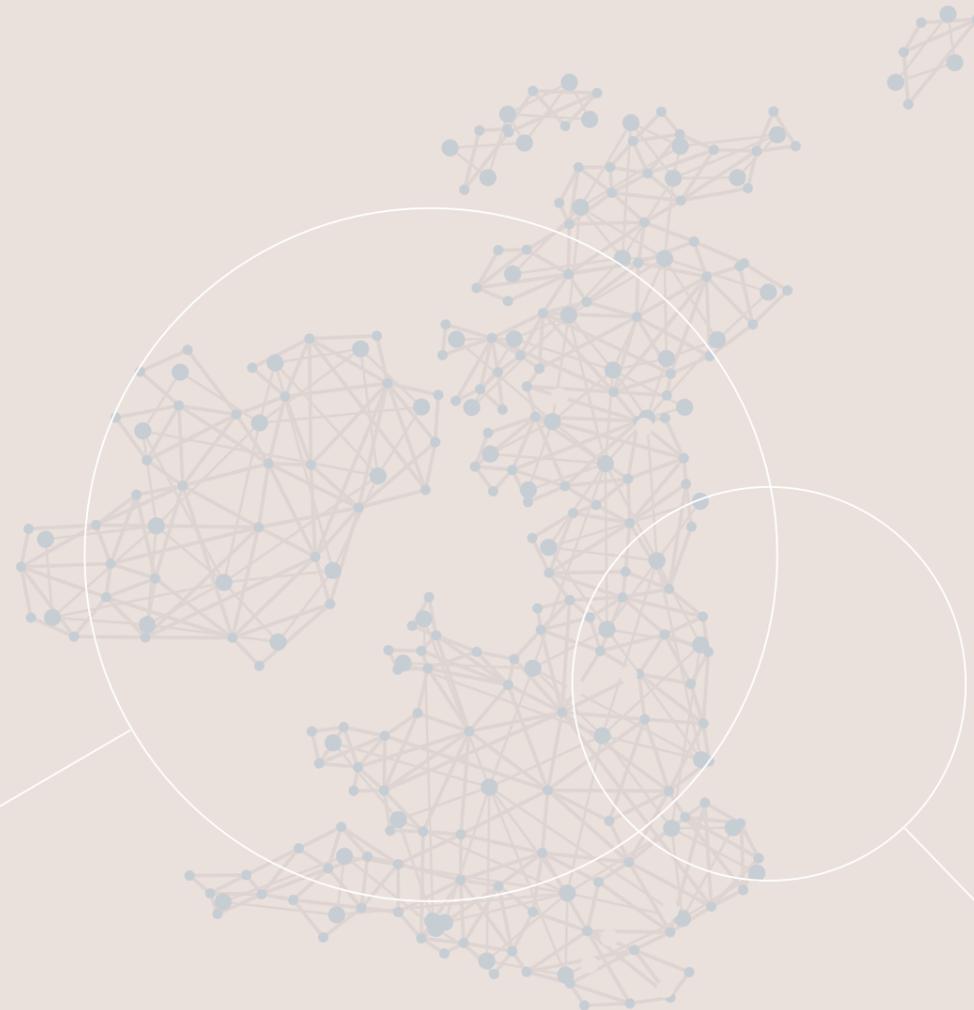
Criminal exploitation: Modern slavery by another name



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About the Modern Slavery Policy Unit

The Modern Slavery Policy Unit, is a joint initiative led by an anti-slavery charity Justice and Care and a leading think tank the Centre for Social Justice (CSJ). The joint Policy Unit has a core mission – to keep modern slavery at the top of the British political agenda and ensure the UK fights the crime. This means better understanding of the nature and scale of modern slavery; increased investment and a sophisticated national response proportionate to the level of threat. Utilising the experience of frontline practitioners, developing creative and evidence-based ideas, fostering a new understanding about the scale of the crime and listening to the voices of survivors, the Modern Slavery Policy Unit works to catalyse the political leadership needed to achieve systemic change.

The Modern Slavery Policy Unit:

1. Advocates for policy and legislation that places victims and their recovery needs at its heart.
2. Bridges the gap between those working to disrupt this crime and support its survivors, and decision makers in Westminster, ensuring that voices from the frontline are heard and heeded.
3. Works on a cross-party basis, bringing together and equipping a strong caucus of parliamentarians to lead the fight against slavery.

Acknowledgements

We would like to thank the many individuals and organisations who attended our regional roundtables and national focus groups and otherwise gave their time to contribute evidence during the course of this research (full list in the appendix).

Special thanks go to the survivors and lived experience consultants who shared their expertise and recommendations with us in order to help protect others.

The views and recommendations in this report are those of the Centre for Social Justice and Justice and Care and do not necessarily represent those of the persons and research participants mentioned above or quoted in the report.

Photos

Some of the photographs in this report are stock images.

Glossary

“Adult” is any person aged 18 or over.

“Child” is any person under the age of 18.

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

“Conclusive grounds decision” is a decision taken by a competent authority in the Home Office as to whether, on the balance of probabilities, there are sufficient grounds to decide that the individual being considered is a victim of modern slavery (human trafficking or slavery, servitude, or forced or compulsory labour).

“County lines” is defined in the Serious Violence Strategy 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.”

“Criminal exploitation” in this report is used to mean when someone is forced, coerced or groomed by someone else into committing crime for the benefit of another person.

“Cuckooing” is a situation where criminals take over someone’s home to use it for their own criminal purposes, often but not only to store or grow drugs as part of county lines networks.

“First responder” is a staff member at a First Responder Organisation with responsibility to undertake responsibilities of the First Responder Organisation to identify potential modern slavery victims and refer them to the National Referral Mechanism. All police forces and local authorities are first responder organisations, as are UK Visas and Immigration, Immigration Enforcement, Border Force and other parts of the Home Office. The Gangmasters and Labour Abuse Authority and the National Crime Agency, and certain named non-governmental organisations are also First Responder Organisations (the full list is available on gov.uk)

“Modern Slavery Victim Care Contract” is the Home Office contract to provide care to adult victims of modern slavery in England and Wales and provided by The Salvation Army as the prime contractor with a number of other charity subcontractors. Support for victims in Scotland and Northern Ireland is devolved.

“National Referral Mechanism” (NRM) is the UK’s framework for identifying and supporting victims of modern slavery, run by the Home Office.

“Potential victim” is an individual who is suspected of being a victim of modern slavery. They may have received a positive Reasonable Grounds decision but will not yet have received a Conclusive Grounds decision from the competent authorities.

“SCA” or “Single Competent Authority” refers to one of the UK’s decision-making bodies that is responsible for making Reasonable Grounds decisions and Conclusive Grounds decisions to determine if a person is to be treated as a victim of modern slavery

“Trap house” is a property used for dealing and taking illegal drugs

Foreword

Everyone should feel safe in their communities. Crime and anti-social behaviour are a blight that destroy people's day-to-day lives, fractures community bonds and change how we feel about where we live. Polling for the Centre for Social Justice last year found the public think crime is the worst thing about their local area. No wonder in the run up to a General Election political parties are emphasising their plans to tackle knife crime and anti-social behaviour and to strengthen policing, especially in crime hotspots.

This report calls for a tougher response to criminals who are taking advantage of young people and vulnerable adults. Criminals are using new ways to coerce people into committing crimes to line their own pockets. At first this might be difficult to understand, but those who are targeted by gangs like an adult with learning disabilities whose home has been hijacked by gangs or a teenager blackmailed into carrying drugs are victims too – victims of criminal exploitation.

That is why this report rightly calls on the Government and frontline policing to make sure criminal exploitation is prosecuted for what it is: a form of modern slavery. This crime can lead to lifetime imprisonment. And means truly tackling organised crime. By going after the masterminds behind it we can end the pattern of crime and exploitation.

This will also allow us to do more to prevent the endless stream of young people and vulnerable adults being pulled into criminal exploitation. And give them the support they deserve. Many are still being prosecuted for crimes they are coerced to commit while those exploiting them walk free and continue exploiting yet more victims.

The report also shows the majority of victims being exploited in the UK are British. This is a growing problem, with numbers increasing year-on-year. Criminal gangs are using children to carry drugs, money, or commit theft. Vulnerabilities like skipping school, family breakdown, and deprivation increase the risks. I know from my previous work as Deputy Children's Commissioner the devastating impact exploitation has on these children and their families. Since becoming Independent Anti-Slavery Commissioner, I have also seen the harm done to the adult victims of this abuse, especially victims of cuckooing whose homes become a place of fear after being taken over and used for crime.

Criminal exploitation affects us all. Neighbours are intimidated by drug dealers coming and going from local properties. Families are threatened by gangs seeking 'payment' for extortionate illegal debts. Young people become ostracised by adults in their community, who see only the crimes being committed and not the chain of exploitation.

In this report the Centre for Social Justice and Justice and Care are clear: we should be tough on crime and offenders. Not all offenders have been coerced or groomed into criminal activity. But when exploitation has occurred, we have to act to break the cycle, going after the abusers using the full force of the Modern Slavery Act and helping victims get out. I agree with them.

It is encouraging to see the great work being done by charities and the progress made by certain police forces, but the response remains inconsistent, not helped by the lack of a definition of criminal exploitation in the Modern Slavery Act. I welcome this report and its challenge to find ways to disrupt this criminal activity effectively and prevent further harm to victims and communities. If we do, we can all feel safer.



Eleanor Lyons
Independent Anti-Slavery
Commissioner

Executive Summary

The typical understanding many people have of modern slavery involves foreign nationals exploited in prostitution or forced to work in inhumane conditions under threats and violence. Yet the most prevalent form of modern slavery in the UK reported by the Home Office over the past four years primarily involves the exploitation of British nationals, mostly teenagers and vulnerable adults, forced, coerced or groomed into committing crime for someone else's benefit. Since September 2019, two thirds of all potential victims of modern slavery referred to the National Referral Mechanism (NRM) due to exploitation that occurred in the UK reported criminal exploitation, 19,877 people in total. 64 per cent (12,641 people) of these were British. 8,879 (45 per cent) were British boys aged 17 or under when they were exploited. This impacts not only the individual victims, but their families, neighbours and wider communities who all suffer the result of this criminal and anti-social behaviour.

The response to criminal exploitation across the country is inconsistent, stemming largely from an incomplete and confusing definition in legislation and policy. Whilst the NRM records and recognises criminal exploitation as a form of modern slavery, the Modern Slavery Act 2015 has no direct reference to it. The connection with other types of criminality and the predominance of British nationals means that often exploitation is not identified. Professionals, families and victims themselves frequently do not apply the label of 'modern slavery' (nor even exploitation in some cases) to what is happening. We need to increase understanding of criminal exploitation and consistently identify it as a form of modern slavery, starting by defining it in the Modern Slavery Act. We need to give the police and other agencies the powers and training they need to end this abuse including a specific offence of cuckooing and extending the reach of Slavery and Trafficking Prevention and Risk Orders. Identifying victims as victims is a first step to giving them better access to the support they need to rebuild their lives through both specialist programmes (including the NRM) and mainstream social care, coordinated through increased multi-agency case conferencing.

Not just county lines

Criminal exploitation is often a feature of, but not limited to, 'county lines' drug dealing. Victims can be coerced or groomed into committing crime through debts, violence or manipulation. They can be made to hold or store weapons, engage in theft and shoplifting, money laundering and even begging. It is becoming integral to the activities of many organised crime groups, spreading into new areas of their operations such as illegal dog breeding.

Deprived communities and vulnerable people most affected

Criminals target people's vulnerability in order to coerce them into criminal activity. Deprivation, substance misuse, mental health issues, learning disabilities, homelessness, and age can all put people at risk of criminal exploitation. Polling for this report found that one in four (25 per cent) people in the most deprived parliamentary constituencies had seen signs of criminal exploitation in their community compared to 15 per cent in the least deprived communities. A quarter (25 per cent) of teachers in schools with the most deprived students had encountered suspected criminal exploitation compared to 12 per cent of teachers at the most affluent schools. Family breakdown, domestic abuse in the home, experience of the care system or exclusion from school can create additional risks for young people. In the 12 months to March 2023 over 14,000 Children in Need assessments in England recorded 'criminal exploitation' as a factor and 61 per cent (20) of the local authorities who provided information in response to our Freedom of Information requests reported that two thirds or more of the young

people they had referred to the NRM for criminal exploitation between January and June 2023 had been a child in need or looked after child at the time of referral. However, there are growing indications that organised crime groups are targeting young people without these vulnerabilities.

Technology is providing new ways to recruit, groom and control victims, providing a sense of belonging for those suffering from social isolation. Older people may be targeted at the supermarket offered help with shopping and before they know it their 'friends' have taken over their home to store drugs. Children may be given even as little as a takeaway sandwich only to later find they must hold drugs or weapons to pay back these 'gifts'.

Devastating lives

Criminal exploitation devastates lives. Violence, threats and physical harm from practices like inserting drugs into their bodies for transportation can leave victims with injuries and lasting trauma. Cuckooing victims' homes can be damaged and victims — even whole families — may need to relocate, losing connection with support networks and extended family. Young people can miss significant amounts of school leaving them without the qualifications they need to move into employment. But the worst impact is that many victims are prosecuted as offenders leaving them with a criminal record and sucked deeper into exploitation and criminality. Many go on to commit serious crimes and exploit others as they progress up the hierarchy of criminal gangs.

Ripple effect touches whole communities

This exploitation has a ripple effect spreading its devastation to families, communities and the country as a whole. Younger siblings are drawn into exploitation, families are threatened and held responsible for drug debt. Neighbours face anti-social behaviour and intimidation, and communities can become normalised to criminality and exploitation. Exploitation allows organised crime and drug use to flourish, strains local resources (police, local authorities, health and even fire services all see increased demand) and ultimately creates more victims — those whose lives are blighted by the crimes committed under exploitation.

Breaking the cycle and building a better future

Yet there are glimmers of hope, often found in the good work being done by charities, community groups, housing associations, police and local authorities. But inconsistency in both support for victims and prevention of exploitation remains. Victims continue to be criminalised and a lack of understanding among professionals remains. Barriers to accessing support from adult social care, housing and the Modern Slavery Victim Care Contract, limited provision of specialist services for young people, and time-limited funding mean that there is patchy access to services that can help. We need a more consistent approach. Not all those involved in organised criminal activity are being exploited — but where they are they need to be identified as victims so that they can be helped to get out of the cycle of exploitation and criminality, and those exploiting them can be investigated and prosecuted. In the long term, reducing the risks of criminal exploitation through early intervention to prevent factors that make people vulnerable must also be a priority.

In order to tackle criminal exploitation, we must:

- **Recognise victims and tackle perpetrators**
 - Amend the Modern Slavery Act 2015 to include a definition of criminal exploitation and make Slavery and Trafficking Prevention and Risk Orders more widely available.
 - Create a specific offence of cuckooing.
 - Embed training on criminal exploitation into core training for a range of professionals including those carrying out commissioned services.
 - Review identification and treatment of criminal exploitation victims by the police and establish collection and publication of data on the statutory defence.
 - Publish an evaluation of devolved NRM decision-making for children and complete a national roll out whilst considering scope for extending to adults.
- **Empower victims to build a new life and prevent re-exploitation**
 - Ensuring victims, especially young people, are offered support to get out of criminal exploitation and offending.
 - Complete the full national roll out of the Independent Child Trafficking Guardian service and publication of evaluations of current pilots for support beyond 18 years of age and for children with parents/guardians in the UK.
 - Issue and update statutory guidance relating to access to support for care leavers and adult victims and to obtain consent from young people turning 18 within the NRM.
 - Amend the Housing Act 1996 so victims of modern slavery are exempt from local connection conditions.
 - Initiate pilots of complex needs navigators to provide outreach support to prevent vulnerable people falling prey to criminal exploitation.
- **Strengthen community and partnership responses**
 - Prioritise neighbourhood policing, building on hotspot initiatives, with a focus on building relationships between police and communities.
 - Establish multi-agency case conferencing approaches to strengthen support for victims in every local authority area.
- **Reduce vulnerability and preventing exploitation**
 - Require education in schools on criminal exploitation and make inclusion part of the Ofsted inspection framework.
 - Take steps to address root causes of vulnerability by supporting people into work, tackling addiction and strengthening families.

Full list of recommendations in the conclusion.

Criminal exploitation is a growing problem devastating the lives of thousands of young and vulnerable people and impacting many more. As the most common form of modern slavery reported over the past four years, we need to act now to disrupt the activities of organised crime groups and to break the cycle of exploitation to rid our communities of this evil crime.



1. What is criminal exploitation?

“I was like a tiny little 11 year old, when I first started to get exploited, and I was 11 and a half when I was arrested. And for the whole year and a half, till I was 13, I was on bail. And then I was 13, when I got my conviction... And I wasn't in school, and I had no education at all”

Emily, Human Trafficking Foundation (HTF) Lived Experience Advisory Panel

1.1 Not just ‘county-lines’

Criminal exploitation is where someone is forced, coerced, deceived, or manipulated (groomed) by someone else into committing crime.

Drugs

The most well-known forms of criminal exploitation are connected to drugs. Young people are exploited to transport or sell drugs, vulnerable people have their homes taken over and used as a place for storing or dealing drugs (‘cuckooing’) and others are forced to look after cannabis plants. Data analysis shared via the Modern Slavery and Organised Immigration Crime Unit indicates that in July 2023 just over half the live police modern slavery investigations for criminal exploitation related to drug distribution and almost a fifth for cannabis cultivation (where criminal exploitation was the primary exploitation type).¹

“The pandemic saw a fundamental change in typologies within the West Midlands. Labour exploitation became less visible to the police and local authorities, but criminal exploitation increased significantly. Most of this was attributed to Vietnamese and Albanian adults encountered within cannabis grows. This pattern has continued post pandemic, but we are also seeing UK adults who are being exploited by drug networks.”

Staff at West Midlands Anti-Slavery Network

Government and police strategies have often focused on criminal exploitation in connection with so-called ‘county lines’ drugs networks which move drugs from larger urban areas for sale in other parts of the country via a designated mobile phone number (the ‘county line’). However, our research has highlighted a trend towards exploitation by local drugs gangs heightened since the COVID pandemic and in response to police interception of county lines. These use similar ways of operating but are not necessarily linked to a specific ‘county line’ from out of the area. Researchers have identified that these networks have moved towards recruiting and exploiting local young people rather than sending them long distances.²

¹ Data provided by police forces directly via direct data entry and available via the Police National Database, analysis shared via the Modern Slavery and Organised Immigration Crime Unit

² Crest Advisory, *County lines after Covid - a new threat?*, 2020; HM Inspectorate of Probation, *County Lines*, Academic Insights 2021/01, 2021

“the vast majority of it, of what I come into contact with, is children and young people involved in drug dealing... some of that is considered to be county lines, some of it seems to be more local organisations,”

Community Safety Coordinator for Brighton & Hove City Council

“classic county line cuckooing - where gang or organised crime group members predominantly from London, cuckoo addresses in Surrey for the purpose of starting a drug line from London to Surrey - is a minority of the cuckooing we see. In Surrey, we are experiencing more local drug line style drug sellers who are also exploiting vulnerable persons addresses by cuckooing them.”

Police Officer, Surrey Police

Criminal exploitation goes beyond drug dealing or cultivation. When it comes to ‘cuckooing’ where someone’s home is taken over by criminals using it for their own purposes, as well as growing, storing or dealing drugs we have heard of cases where the property was used for prostitution and for storing stolen property.

“Your home should be your safe place, I think cuckooing is when your home is no longer your safe place, even if you ‘consented’ at some point to allowing the people in.”

Staff at Catalyst

Case study - St Giles Trust

Ade* had travelled by train from the West Midlands and been in Scotland for over a week, living in a trap house.

He was arrested by the police who apparently confiscated £800 in cash but he was not charged. It seems this was the first time he had gone to Scotland and he was very shaken up by his experience. He hadn’t realised how dangerous it was and that Merseyside and West Midlands ‘gangs’ were there. He was out of his depth and rescue workers suspected that there were people after him. In the rural area of Scotland in which he was arrested he is very noticeable because of his ethnicity (Black). Unfortunately, his photo and details had been posted on the internet in an attempt to alert authorities that he was missing from his semi-independent care placement. However, this inadvertently placed him in greater danger.

The St Giles Trust County Lines Support Service team from Merseyside went to collect Ade from Perth as Police Scotland seemed unable to meet them nearer the border. Once he was sure he could trust the rescue workers Ade was open about being scared and talked about being involved in local drug dealing, with some references to longer distance involvement. Before his rescue he had said that he was in college, but in the car with the support workers he admitted that he’d dropped out and was ‘working all the time’ - drug dealing. He said he’d been paid whilst in the trap house but when a rescue worker found a receipt from his cash machine withdrawal at a service station it only showed £1.75 left in his account. It could be that the confiscated money was his ‘pay’ although this is unlikely.

The Merseyside team liaised with the St Giles team in the West Midlands who met them with Ade in Lancashire and took him back to his accommodation.

* Name changed

From an independent evaluation of St Giles Trust County Lines Support Service, JH Consulting, 2022 shared privately



Acquisitive crime

Theft, burglary, shoplifting and forced begging are common other forms of criminal exploitation.³ Police in Newcastle told us about young people some of whom are associated to peer crime groups and urban street gangs using social media to ‘task’ young people to steal specific bikes or cars. We also heard about children being used to break into homes to steal car keys to enable theft of the vehicle.

“we’ve also seen young people being exploited to kind of change number plates, you know, like the car chopping type stuff like changing number plates around theft of mopeds, those kinds of things.”

Barnardo’s practitioners

Case Study – Justice and Care

In May 2023, our UK-based Victim Navigators worked with our team in Romania to arrange for the repatriation of a Romanian survivor of criminal exploitation and forced begging after he presented himself at the Romanian embassy seeking support to return home.

The survivor in this case had travelled to the UK three years previously with the help of a gang member, who forced him to steal and beg on the street, confiscating his passport and belongings. After managing to escape from his exploiter, the survivor was left homeless and was living on the street for more than a week before he was assisted by a member of the public to seek help from his embassy.

Our Navigators supported the survivor to provide key evidence to police, detailing the nature of his exploitation. Following this, he was supported to return to Romania, where our Romania Navigators have been assisting the survivor with his job hunt, as well as with emergency food and hygiene supplies, and obtaining documentation.

Violence

Alongside other criminal activity victims can also be coerced or manipulated into acts of violence or carrying of weapons. The people we interviewed told us it was their impression that the level of violence had been increasing over the last five years and that it was now accepted in some communities that children will be carrying bats and knives. Police recorded crime statistics also show a dramatic increase in violent and knife-related crime in recent years, having been falling prior to 2013. Recorded violent crime has risen from 601,141 in 2012/13 to 2.1 million in 2022/23 and violent or sexual offences involving a knife have increased from 28,289 in 2012/13 to 50,489 in 2022/23.⁴

³ Barnardo’s, *Exploited and Criminalised - What can the Police, Crime, Sentencing and Courts Bill do to ensure that children who are criminally exploited receive the care and support they need?*, 2021

⁴ Office for National Statistics, *Crime in England and Wales, Appendix Tables and Other Related Tables*, 2023

“I’ve seen a massive increase in the violence, and the increase of pressures and exploitation for the children that I’m supporting, to carry, to carry weapons such as machetes, and knives”

Barnardo’s practitioners

Money laundering

With money gained from drug dealing and theft, comes money laundering. Support workers described how young people are asked to hold money in their bank accounts for gangs which can then lead to further exploitation. Children’s bank accounts are not subject to the same level of scrutiny with anti-money laundering protocols focussed on the parents/guardians, which make this an attractive option for organised crime groups.⁵

“Children and young people are being approached to hold large amounts of money in their accounts for a fee, only to control the account and avoid detection. It has also been reported that [children’s financial products] are giving exploiters the opportunity to move finances and avoid detection. Children and young people will be paid a small amount to open an account, deposit a larger amount then take the card and control of the account. Parents may not be aware until it has been flagged and the address on the account is contacted, this however is too late.”

Senior Service Manager County Lines Support & Rescue Service, Catch 22

A more unusual form of exploitation we heard about is the coercion of young adults into caring for illegally bred puppies. Pure Insight, a charity working with care leavers in the north of England told us that young people they work with have been coerced by criminal gangs to look after puppies in their own homes at their own expense. Sometimes this leads onto other forms of exploitation with the young adult asked to ‘look after’ something else such as drugs or weapons. This suggests that exploitation has become part of the standard operating model for organised crime groups no matter what sort of criminal activity they are involved in.

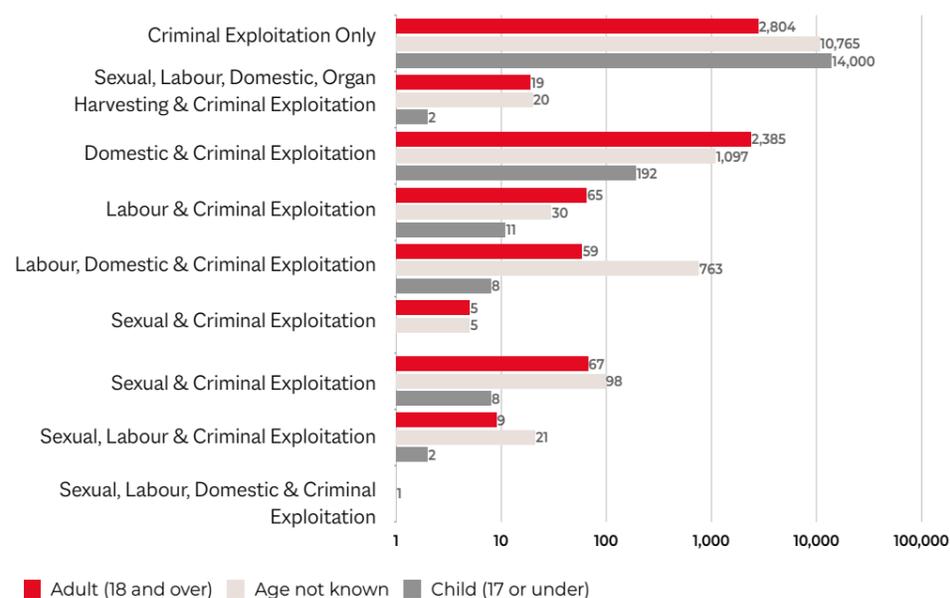
This is further demonstrated by the NRM statistics that show a proportion of criminal exploitation victims also report other forms of exploitation (as shown in figure 1). Of the 19,877 people referred to the NRM for criminal exploitation in the UK between Q4 2019 and Q3 2023 a quarter of them reported criminal exploitation alongside other forms of modern slavery. The most common other forms of exploitation reported alongside criminal exploitation are labour exploitation and sexual exploitation. For adults, nearly as many report combined labour and criminal exploitation as criminal exploitation only (2,385 compared to 2,804) and just 59 reported sexual exploitation with criminal exploitation. For children (aged 17 or under) the vast majority report criminal

⁵ FT Advisor, *Child accounts risk becoming money muling targets*, 2022



exploitation only (10,765). A much smaller proportion of children report criminal exploitation with labour exploitation (1,097) or sexual exploitation (763). More young people report sexual exploitation with criminal exploitation than adults which echoes what charities told us that frequently young women are sexually exploited alongside criminal exploitation and may initially be identified as sexual exploitation victims—although this can happen to young men too. Some charities also argue that the practice of ‘plugging’ where drugs are inserted into the body internally for transportation should be seen as a sexual offence.⁶

Criminal exploitation in connection with other exploitation types, NRM Q4 2019 - Q3 2023



Source: CSJ and Justice and Care analysis of Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition. UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-10>*

1.2 Powered by technology

A recurring theme with all those we spoke to, was the role of technology in grooming people, especially young people, into exploitation and enabling that exploitation. At a broader level we were told about adverts on social media purporting to be a way to make money—which turn out to be illegal — and often lead to coercion or debt bondage that force someone into continued criminal behaviour. Social media feeds are often filled with content that presents a glamorised lifestyle showing the supposed benefits of getting involved in crime and laying the groundwork for someone to be groomed into criminal exploitation.⁷

⁶ Human Trafficking Foundation, *Child Criminal Exploitation and The Need for Consistency*, April 2022
⁷ Crest Advisory, *Running out of credit: Mobile phone tech and the birth of county lines*, 2022

“It’s really easy to recruit young people into gangs: Social media leads them to accept criminality as a norm and so they start acting out what they see on YouTube.”

Strategic Lead for SY-NC (Voluntary Action Sheffield)

People can also be targeted directly through specific messages where someone, either someone they know or a stranger will connect with the victim on social media apps then befriend and groom them, or blackmail and bully them into carrying out criminal activity. This sort of approach is not limited to social media. Young people are also being targeted through online gaming—something that it is suggested has increased since COVID.⁸ This ability to target people, especially young people through technology, means that the criminal gangs can reach them even when they are believed to be safe and at home. These also seem to be the routes that draw in many young people who have fewer other vulnerabilities (i.e. those not from families struggling financially or with other challenges).

“Children and young people are reachable 24/7 these days, even alone in their room, the mobile phone can ping, online gaming — and most apps — have gift or chat functions. Mum and dad think everything’s okay, because they are up in their room yet, two days later, you’ll get a package to the door for like £2,000 worth of mobile phones or something like that, to hold.”

Senior Service Manager County Lines Support & Rescue Service, Catch 22

The easy ability to record and publish photos and video can also be used as a way to blackmail victims into more and more risky activities. Photos, videos and screenshots of messages considered to be embarrassing or incriminating (including often graphic sexual images) are used to ensure victims comply with the demands of the gang. Technology is also used to exert control through surveillance used by gangs to track where victims are and what they are doing at all times using GPS, video calling and photos in a process researchers have called ‘remote mothering’.⁹

As well as a means of recruitment and control technology is also used to facilitate the crimes themselves. The traditional ‘county line’ concept as police understood it involves the use of ‘burner’ mobile phones that are not internet enabled, but more recent innovations in technology have presented new opportunities. As mentioned above social media and encrypted messaging apps are used to direct thefts and facilitate drug sales and the rise in online banking (including specific accounts and apps targeted at children) has made this an attractive way to launder money.

⁸ House of Commons Education Select Committee, *Child Exploitation and county lines, Oral evidence HC 1114, 2023*

⁹ Michelle Storrod, James Densley, ‘Going Viral’ and ‘Going Country’: *The Expressive and Instrumental Activities of Street Gangs on Social Media*. *Journal of Youth Studies*, 2017, 20. 677–696. 10.1080/13676261.2016.1260694.

2. How big a problem is criminal exploitation?

“most of the time people that are criminally exploited don’t want to see themselves as a victim.”

Alicia, HTF Lived Experience Advisory Panel

2.1 Most common type of modern slavery in the UK

Criminal exploitation is the most prevalent form of modern slavery reported in the UK and touches communities across the country. However, until recently it wasn’t understood as a separate form of modern slavery and the term is not used in modern slavery and human trafficking laws in any of the UK home nations.

Polling for this report found that a fifth (21 per cent) of those asked had seen signs of criminal exploitation in their community.¹⁰ Separate polling with teachers found that 15 per cent of all teachers and 27 per cent of all teachers in state secondary schools had encountered suspected criminal exploitation in the previous six months¹¹ These signs are even more common in more deprived communities, as explored in chapter 3.

Our analysis of Home Office data shows that since the Home Office started recording criminal exploitation as a separate category for victims referred to the National Referral Mechanism (NRM) in quarter 4 of 2019, it has been the most common form of modern slavery reported, particularly for victims who were exploited solely in the UK.¹²

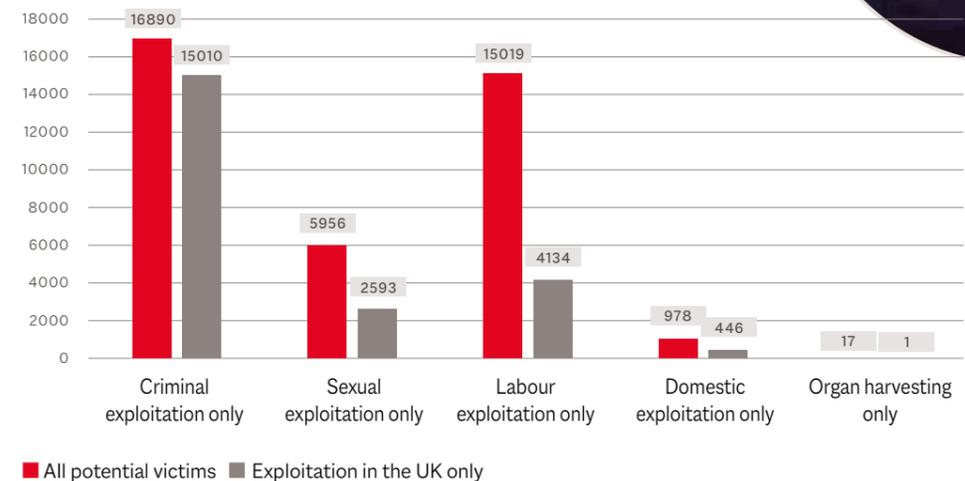
¹⁰ Polling of a nationally and politically representative sample of 2,050 adults in the UK conducted for the Centre for Social Justice and Justice and Care by Opinium, fieldwork 25-27 October 2023.

¹¹ Polling of over 7,800 teachers conducted for the Centre for Social Justice and Justice and Care by Teacher Tapp on 1 November 2023. Teacher Tapp is a daily survey app that asks over 9,000 teachers questions each day and reweights the results to make them representative to reflect national teacher and school demographics

¹² CSJ and Justice and Care analysis of Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition.* UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-10>



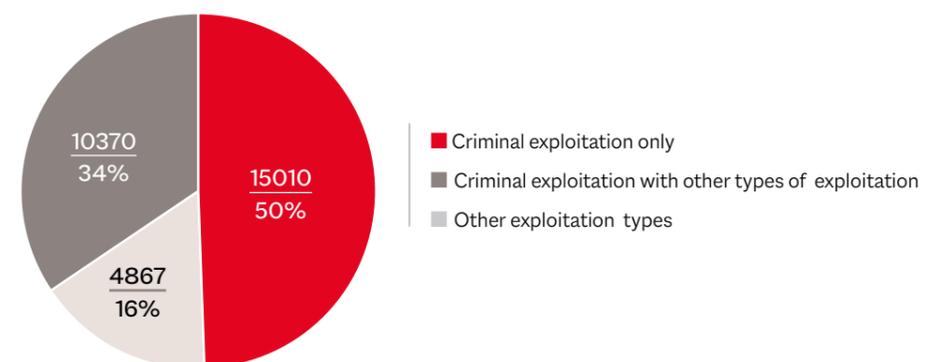
Potential victims by exploitation type (excluding multiple types)
NRM Q4 2019 - Q3 2023



Source: CSJ and Justice and Care analysis of Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition.* UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-10>

Two thirds of all potential victims of modern slavery exploited here in the UK have reported criminal exploitation - either alone (50 per cent) or alongside other forms of modern slavery (16 per cent). Unlike some other forms of exploitation where people might be exploited in other countries en route to the UK, the overwhelming majority of potential criminal exploitation victims identified have been exploited here in the UK (83 per cent).

Criminal exploitation as a proportion of all modern slavery occurring in the UK, NRM Q4 2019 - Q3 2023

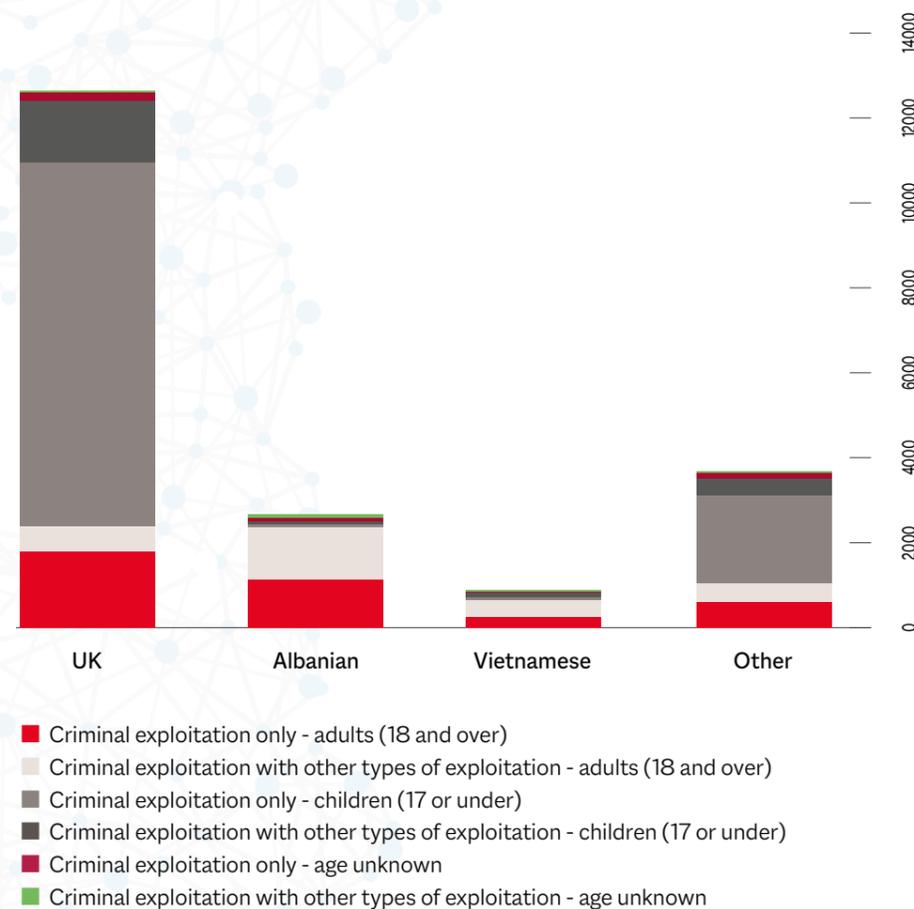


Source: CSJ and Justice and Care analysis of Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition.* UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-10>

2.2 The typical victim identified is young, British and male

Nearly two thirds (64 per cent) of all potential victims referred to the NRM for criminal exploitation in the UK since late 2019 are British nationals, 12,641 people in total. In terms of identified victims of other nationalities the most frequently identified are Albanian and Vietnamese. However, in our interviews, charities and police officers told us about Afghan young people being exploited, the exploitation of unaccompanied asylum-seeking children and young people of several nationalities and the exploitation of people from a range of different Eastern European countries including Romania, Lithuania and Bulgaria.

Nationality and age of potential victims referred for criminal exploitation in the UK, Q4 2019 - Q3 2023



Source: CSJ and Justice and Care analysis of Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition.* UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-10>

Most victims referred to the NRM for criminal exploitation occurring in the UK are under the age of 18 (65 per cent, 12,800 referrals).

Even without other circumstances that can make them additionally vulnerable (see chapter 3), a lack of life experience can make children and teenagers more susceptible to coercion and grooming. Particular focus has been given to ‘child criminal exploitation’ in recent years which has given it more prominence and increased understanding that, despite being involved in committing crime, these young people may also be victims of exploitation. Perversely, this understanding can in turn can make them even more attractive to criminal gangs trying to avoid prosecution. Criminals exploit young people to commit crime on their behalf giving them distance and deniability from the offending itself. If young people are recognised as being exploited, they will not be prosecuted but may not escape the exploitation, so gangs continue their operations unhindered. Whilst most exploitation occurs with teenagers, the experts we spoke to highlighted a trend with some younger primary school aged children being drawn into criminal exploitation.

“because in general, we treat anyone under the age of 18 as a child, and therefore cannot consent,[...]what the gangs have realised, is well, ‘what we’ll start doing is sending out younger and younger and younger children,’ to the point where eight and nine year olds are now being recruited into the gangs, because they know that they will never ever be prosecuted, and they will always be looked after. So by trying to be good, we’ve actually brought more people into the exploitation. And younger people are more vulnerable people.”

Police Officer

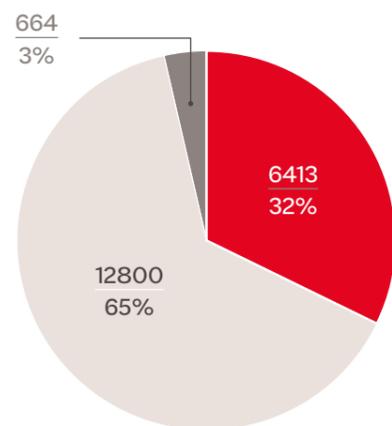
The criminal exploitation of adults is less well understood among police and the public at large. The ability to refer children under the age of 18 to the NRM without needing their consent may in part explain the number of children referred for criminal exploitation being so much higher than for other exploitation types.

However, our research with charities and Justice and Care’s own casework shows that there are many adults who are victims of criminal exploitation. Data provided by police forces by direct data entry and available via the Police National Database (PND) shared via the Modern Slavery and Organised Immigration Crime Unit (MSOIC Unit) showed almost a 50/50 split between adult and child victims of criminal exploitation in live modern slavery investigations in July 2023. Many of the charities we spoke to highlighted that often adult victims of criminal exploitation are not recognised as modern slavery victims, either by themselves or by those assisting them and so are not referred to the NRM. Others may not wish to be referred. Instead, often these adults are supported to overcome other issues they may be facing such as homelessness or substance misuse with the criminal exploitation just being a part of their experience.



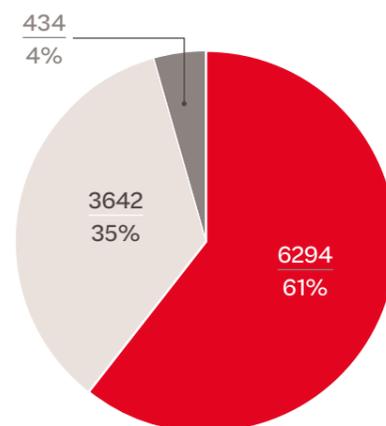
Age of potential victims exploited in the UK, NRM Q4 2019 - Q3 2023

Criminal exploitation including with other exploitation types



- Adult (18 and over)
- Child (17 or under)
- Age not known

All exploitation types except criminal exploitation



- Adult (18 and over)
- Child (17 or under)
- Age not known

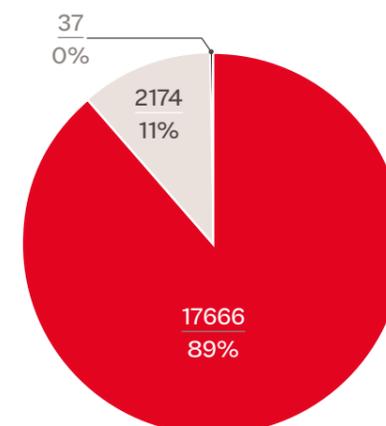
Source: Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition.* UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-10>

The majority of all identified victims of criminal exploitation in the UK referred to the NRM, including alongside other forms of modern slavery, are male (89 per cent).¹³ This is echoed in other data including calls to Unseen's National Modern Slavery and Exploitation Helpline (57 per cent male)¹⁴ and Justice and Care's own casework data (three-quarters male compared to just over half of victims supported across all types of modern slavery as of 7 August 2023).

¹³ Calculated from Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition.* UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-10>

¹⁴ Unseen, *Modern Slavery and Exploitation Helpline Annual Assessment 2022, 2023*

Gender of potential victims of criminal exploitation in the UK (including with other exploitation types), NRM Q4 2019 - Q3 2023



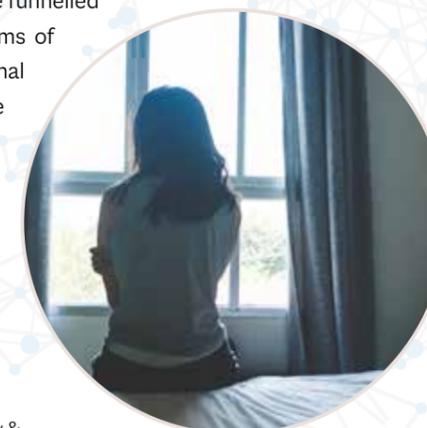
- Male
- Female
- Other or unknown

Source: CSJ and Justice and Care analysis of Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition.* UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-10>

More than 4 in 10 (45 per cent) of the victims referred to the NRM since the end of 2019 for criminal exploitation that happened in the UK were male British nationals who had been exploited when under the age of 18 which is 8,879 young people.¹⁵ However, research suggests that gangs are using the relative invisibility of young women to go 'under the radar'.¹⁶ Professionals we spoke to from both the police and charities suggested that female victims are probably being missed. They suggested that there is still a tendency to assume female victims are more likely to be victims of sexual exploitation (especially under 18s) so these victims can be funnelled down a sexual exploitation support pathway rather than identified as victims of criminal exploitation. Procedural challenges in searching young female criminal suspects (who may turn out to be victims) due to a lower number of female police officers can also mean there is not the same level of engagement with young women preventing their identification as victims.

¹⁵ Calculated from Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition.* UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-10>

¹⁶ Tirion Elizabeth Havard, James A Densley, Andrew Whittaker and Jane Wills, *Street gangs and coercive control: The gendered exploitation of young women and girls in county lines*, *Criminology & Criminal Justice*, 23(3), 313-329, 2023



3. What makes people vulnerable?

2.3 Most investigated form of modern slavery

The MSOIC Unit reported that in December 2023 58 per cent of all live police modern slavery investigations recorded on the Police National Database were primarily for criminal exploitation, a total of 1,946 investigations.¹⁷ Similarly, 70 per cent of all the potential victims identified by police forces and referred to the NRM for exploitation since the last quarter of 2019 have been for criminal exploitation.¹⁸

It is possible that the higher rates of NRM referral and police investigation for criminal exploitation compared with other types of modern slavery may be a byproduct of other policing priorities (such as pursuit of drugs crimes, especially a focus on county lines). Data from Unseen's National Modern Slavery and Exploitation Helpline shows under nine per cent of their calls in 2022 related to criminal exploitation, far below the level of police investigations or the 28 per cent of NRM referrals for that same year. The Helpline also reported more calls related to Albanian victims than overall NRM figures.

“It is important to remember that anyone can be cuckooed. It only takes one trigger event in a person’s life for them to fall into tough times and become vulnerable to cuckooing.”

Police Officer, Surrey Police

3.1 Pathways to exploitation

In most cases, victims of criminal exploitation are already vulnerable before criminal exploitation takes their situation from bad to worse. In fact, it is their vulnerability which makes them a target. Research has identified a range of factors that can make children and adults more vulnerable to criminal exploitation. However, recent assessments have noted that they are not all present for all victims, and some victims may have experienced none of these additional vulnerabilities.¹⁹ Research into the evolution of county lines exploitation has noted for example *“increasingly they are local children with no previous links to welfare or criminal justice agencies.”*²⁰

Substance misuse

Substance misuse puts people at risk of criminal exploitation, particularly ‘cuckooing’ where someone’s home is taken over by criminals. Sometimes this starts as ‘payment’ for an outstanding drug debt or after accepting ‘free’ drugs in return for dealing or allowing access to their home. In other cases, simply the person’s lack of capacity due to regular intoxication is taken advantage of by people they consider to be their ‘friends’. Sadly, for some people having their home taken over by criminals can trigger a relapse or new addiction.

Mental health, learning disabilities and neurodivergence

Other issues that can affect someone’s capacity to make decisions such as mental health issues and learning disabilities can also put them at risk of grooming that leads to exploitation. This can include impact on decision-making caused by previous trauma, domestic abuse or violence.

“Learning disabilities and neurodiversity are a big factor for people. For adults we find that often these vulnerabilities were missed when they were children.... Undiagnosed learning difficulties are a big cause of vulnerability [to criminal exploitation].”

Staff at Newcastle City Council

¹⁷ Modern Slavery and Organised Immigration Crime Unit, *Non LEA Overview Of Live Modern Slavery Investigations (Msid) In UK Policing November 2023 (data to 14/12/2023)*, 2023. Data provided by police forces directly via direct data entry and available via the Police National Database.

¹⁸ 70 per cent of all referrals were for criminal exploitation only or criminal exploitation alongside other types of exploitation. Calculated from Home Office, *Modern Slavery Research & Analysis. (2023). National Referral Mechanism and Duty to Notify Statistics, 2014-2023. [data collection]. 10th Edition*. UK Data Service. SN: 8910, DOI:

¹⁹ The Child Safeguarding Practice Review Panel, *It was hard to escape - Safeguarding children at risk from criminal exploitation, 2020*

²⁰ HM Inspectorate of Probation, *County Lines, Academic Insights 2021/01, 2021*

Case study – Dewsbury Community Outreach

Lee suffers from foetal alcohol syndrome which has given him cognitive impairment and an alcohol addiction. He also spent time in care as a child, but he had done vocational training and found work and was living independently in council housing.

After moving to another town, some people he thought were his friends introduced him to drugs and he began using. Drug dealers ‘befriended’ Lee and began to exploit him, financially at first. The dealers would keep Lee’s bank card and all the information about his family contacts from his phone as a way to blackmail him. Every time his benefit payments were made into his account the dealers who were exploiting him knew exactly which day and time the payment would arrive. They would take Lee to the bank, he would withdraw all the money and then hand the money and the card back to the dealer who was waiting outside. Eventually dealers began storing drugs in his home. He is very vulnerable and was prepared to go along with these things just because they appeared to be his friends.

Lee was able to stop using drugs and wanted the dealers to stop storing drugs in his home and went to the police for help, but the police didn’t take any action. The drug dealers had started threatening him, wanting him to deal drugs for them and even threatened him with a knife. At this point he went back to the police and action was taken and he was referred for support to move to another area. In his new home Lee still requires a lot of support.

Homelessness

Current or previous experience of homelessness is another risk factor especially in combination with drug or alcohol misuse and/or mental health issues. Action Homeless Leicester told us about young men in their homeless hostel being exploited to hold drugs or weapons. Other charities similarly spoke about larger hostels being a target for criminal gangs who were well aware of the locations and also an increase in this sort of activity during the ‘Everyone In’ initiative to bring rough sleepers off the streets during the COVID pandemic. The Passage charity working with homeless people in London has reported that of the modern slavery victims they worked with in 2022, 18.3 per cent had been victims of criminal exploitation.²¹

Experts from Surrey Police and their partner charity Catalyst also told us that *“people who have a history of homelessness themselves will often feel sympathy towards other homeless people and provide them shelter in their home. This can then turn into exploitation and being taken advantage of. Due to various issues the tenant is often not able to protect themselves from this exploitation.”* Although, in some cases this may simply be other homeless people or drug users taking over a property as a place to stay or take drugs, organised criminals can also be behind it. Rough sleepers and other homeless people can also be drawn into organised and coerced begging.

²¹ The Passage, *Modern Slavery Service Report 2022-2023*, 2023

Challenging family circumstances and experience of the care system

Strong parental relationships are a protective factor that can prevent exploitation in most cases, but young people can be exploited even when they have active parents who are doing their best to care for them. A range of challenging family circumstances leave some children even more vulnerable. Literature shows a number of risk factors for young people related to their family circumstances including domestic violence, parental drug dependency, abuse, neglect and familial involvement in criminality.²²

“Young people often don’t have positive role models within their family and their community, they don’t see themselves as exploited, younger brothers aspire to be like their older brothers who are a part of a gang, and they don’t have hope for a different future.”

Staff at Action for Children

In some families, involvement in criminality and exploitation goes back generations creating a normality of behaviour and a cycle that is hard to escape from.

“This isn’t a single generation problem—it is a multi-generational problem. And it’s getting worse now with this generation. It’s the parents of the children and in some cases the grandparents of the children, who first encountered challenging situations and that societal breakdown has been going on for a very, very long period of time. And now we’re seeing the symptoms of that which are extreme.”

Staff at Avenue Centre for Education

Family breakdown is another factor that can make young people vulnerable, although not all victims of criminal exploitation come from broken families. In one review by the Child Safeguarding Practice Review Panel, 14 of the 21 children whose cases were reviewed were from families where the parents had separated.²³ Similarly, a review of the experience of black and mixed heritage boys in the justice system found that they had often been exposed to violence and family breakdown, a third had been subject to Child in Need or Child Protection plans. Almost a third had been victims of criminal exploitation.²⁴ Family separation presents specific challenges for both parents and children that can also create additional risks. Boys may be without positive male role models due to absent fathers, single parents working long hours may mean young people are unsupervised for significant stretches of time. The emotional pressures of a relationship break up on both parent and child may mean initial behaviour changes due to exploitation are not identified because they are thought to be a response to parental separation.²⁵

In other cases, exposure to trauma of some kind such as domestic abuse or the sexual or physical abuse of a sibling can put young people at risk. A report for the Victims Commissioner into the

²² Children’s Social Care Research and Development Centre, *A systematic map and synthesis review of Child Criminal Exploitation*, 2019

²³ The Child Safeguarding Practice Review Panel, *It was hard to escape - Safeguarding children at risk from criminal exploitation*, 2020

²⁴ HM Inspectorate of Probation, *The experiences of black and mixed heritage boys in the youth justice system*, 2021

²⁵ Nina Maxwell, *I’m Trying to Save My Family: Parent Experiences of Child Criminal Exploitation*, Youth Justice, 23(2), 243-258. 2023

overlap in children's experience of domestic abuse and criminality notes that "experiences of domestic abuse can overlap with risky behaviour, offending behaviour, and further victimisation". The report highlights how domestic abuse in the home can normalise violence desensitising young people to it when they encounter it elsewhere and leading them to see violence as a way to 'get what you want'. Negative experiences at home can also lead young people to seek family, love, support and belonging outside the family all of which put them at greater risk of criminal exploitation.²⁶

"There is this risk to siblings [of sexual abuse victims], particularly male siblings, that could lead to them becoming disenfranchised with their families.... Accidental neglect or mental health amongst the parents, disability and challenging behaviour of the primary victim [of abuse], misplaced feelings of anger that the victim was responsible for the removal of abusing male parent or sibling that would push them towards either becoming more likely perpetrators of domestic abuse or looking for some kind of attachment out in the community that would make them at more risk of say, of criminal exploitation."

Staff at Restitute

'Challenging family circumstances' was the most common safeguarding issue encountered by teachers surveyed for this report seen by 84 per cent of teachers (and 90 per cent of teachers in the most deprived schools). Of course, challenging family circumstances alone do not predict exploitation but the increased vulnerability to exploitation makes this a very concerning finding.

Young people in care are especially vulnerable. Freedom of information requests we made to over 200 local authorities revealed that many local authorities do not have joined up systems for analysing relevant risk factors such as schooling or child protection status of the victims of modern slavery they have referred to the NRM. However, of the 33 authorities that did provide us with data about looked after children 61 per cent (20) reported that two thirds or more of the young people they had referred to the NRM for criminal exploitation between January and June 2023 had been a child in need or looked after child at the time of referral. Other data from Children in Need assessments for the year to March 2023 shows that in England over 14,000 children in need assessments recorded 'child criminal exploitation' as a factor up from around 10,000 the previous year. This is much higher than the number of assessments recording 'trafficking' (just over 2,700) which highlights issues around the understanding of criminal exploitation and modern slavery.²⁷

Concerns have been expressed for several years about the risks of exploitation for looked after young people living in unregulated and semi-independent accommodation.²⁸ In our research we heard that criminal gangs know where the accommodation for young people is and target those properties and that staff in this accommodation are inadequately trained to be able to identify risks and indicators of exploitation.

²⁶ Victims Commissioner, *Sowing the Seeds Children's experience of domestic abuse and criminality*, 2020

²⁷ Gov uk, *Children in Need Statistics*, 2023.

²⁸ Children's Commissioner for England, *Unregulated - Children in care living in semi-independent accommodation*, 2020.

"the system around placement commissioning is broken. And it is a huge, huge area for us. And it's a huge area of risk for children, young people, because they're then placed in inappropriate nonregulated placements, who have again, turnover of staff, not particularly well-trained staff, staff who will let kids go and stand out the front for a fag when they're not supposed to. So, then they just hop in the car, if the person [exploiter] comes,"

Barnardo's Practitioners

The lack of family support and wider community also puts care leavers at particular risk even if they have avoided exploitation before turning 18. Care leavers are often provided with tenancies at a much younger age than their contemporaries without family advice and support to fall back on. A shortage of available properties can mean young adults are placed in locations far away from any community connections. This makes them a prime target for cuckooing.

Case study - Pure Insight

One young person on leaving care was placed in a flat that was quite far away from where she had been living. The distance made it very difficult for her to have a connection with her sister who was seen as a protective factor. As a result, she then gravitated to getting involved with county lines and gangs. They were using her property as a place to deal drugs to the local community and took over the property and cuckooed it completely.

At first this young woman viewed this relationship as a friendship, but ultimately, she became addicted to the drugs that she was selling alongside the gang at her property. Eventually the property was raided and then the neighbours didn't want to have anything to do with her, they saw her as the cause of the trouble. This escalated that sense of isolation making her more likely to see the gangs as her point of connection rather than the community.

School absence and exclusion

There is a clear overlap between exclusion from school and criminal exploitation. In some cases, exclusions come after young people are already caught up in exploitation — often for behaviour connected to their exploitation such as missing a lot of school, violence or bringing drugs or weapons onto school premises. In other cases, exploitation may begin after exclusion when the young person's absence from school allows them to come into contact with criminal gangs. In both situations exclusion from school creates the conditions for exploitation to escalate. Children who are suspended or excluded from school or for other reasons on a reduced timetable have a lot of spare time on their hands, time when they may not necessarily be under adult supervision and time in which criminal gangs can groom or coerce them into criminal activity.

"getting them back into education is a challenge, because schools are saying, you know, they bring in drugs on site, or they're smoking on site or whatever. But then the more time they have to be at home makes them much more vulnerable to being exploited further."

Social Worker, Cardiff City Council

“as they start getting more exclusions, or you know, those kinds of things, that then increases the opportunity for the trap, because it sort of cycles itself then to where you end up with children in alternative provision, which is basically a melting pot of loads of different exploiters kind of pulling people together... , even for those where there weren't issues with education at the start of the exploitation process, very quickly, there become issues with exploitation with school attendance, school behaviour.”

Barnardo's practitioners

Many of the charities and police officers we spoke to expressed concern that Pupil Referral Units (PRUs) which serve to help excluded young people continue their education, can also be places where young people are drawn into criminal exploitation by others they meet there. This is particularly concerning considering that rates of exclusion are higher than average for young people with special educational needs (SEN) and those on free school meals. This compounds their vulnerability. In the Autumn term 2022/23 pupils with SEN without an education health and care plan (EHC) had the highest rate of permanent exclusions at 0.12, compared to 0.02 for pupils with no SEN and 0.07 for SEN pupils with an EHC. Pupils eligible for free school meals were 5 times as likely to be permanently excluded as non-free school meal eligible children (0.10 compared with 0.02). Out of 3,104 permanent exclusions 1,893 were pupils eligible for free school meals and 1,300 for pupils with SEN but no EHC.²⁹

Data from FOIs published by the BBC found that nearly a quarter of children identified as at risk of criminal exploitation in four areas of England in the school year 2021-22 were excluded or suspended (512 out of 2,300 at risk). The following year, the number of both at risk and excluded children had risen (600 excluded or suspended and 3,800 identified as at risk).³⁰

The CSJ has highlighted the increase in rates of severe and persistent absence from school in England since the COVID pandemic. Department of Education data reveals that in Spring term 2023, 140,000 pupils were severely absent, meaning they missed at least 50 per cent of their lessons. This has more than doubled since before the pandemic.³¹ Unsurprisingly, frequent absence was the third most common safeguarding issue encountered by the teachers surveyed for this report (72 per cent of all teachers).³² Unfortunately, there seems to be little systematic data collected to establish how many of these absent children have become victims of exploitation. In response to our FOI request only 23 local authorities provided the specific number of children referred to the NRM for criminal exploitation who had been persistently or severely absent from school in the year prior to their referral.³³

²⁹ Department for Education, *Permanent exclusions and suspensions in England Autumn term 2022/23*, 2023. Some students may have more than one characteristic ie they may have both SEN and be eligible for free school meals.

³⁰ BBC File on 4, *A Different Class: Excluded kids lured into crime*, 2023

³¹ Centre for Social Justice, *Severe absence from school hits record high amid calls for urgent action*, Media Statement, 19 October 2023

³² Polling of over 7,800 teachers conducted for the Centre for Social Justice and Justice and Care by Teacher Tapp on 1 November 2023. Teacher Tapp is a daily survey app that asks over 9,000 teachers questions each day and reweights the results to make them representative to reflect national teacher and school demographics

³³ A further 14 provided an indication that some children had been absent but because numbers were low to avoid the risk of identifying individual children they declined to give specific numbers.

Of these, 74 per cent reported that at least half the children referred had been persistently or severely absent prior to referral. The fact that being out of school provides an opportunity for criminals to draw children into exploitation must raise concerns about the risks to this group of persistently and severely absent young people.

“Some of our lowest attenders are ones that we're aware of that are involved in exploitation. And the pull of whatever it is they're doing out on the streets is too great. Either they can't escape from it, or they don't want to escape from it.”

Staff at Avenue Centre for Education

Prison

Prison can be another place where people come into contact with gangs who go on to exploit them, especially prisoners who have learning disabilities or substance misuse issues which make them vulnerable. For some victims, prison is a place where exploitation intensifies or becomes more entrenched. For others, they arrive in prison for unconnected offences but are brought into the orbit of gangs who take advantage of the situation to exploit them.

Social isolation

Bound up with many of these other risk factors, social isolation is often the thing that tips many people over the edge into exploitation. Criminals take advantage of the innate human need for connection and use it to dupe and control their victims. When someone is already vulnerable, perhaps due to age or life circumstances, they are at greater risk of falling under the influence of criminals who 'befriend' them. Unseen's National Modern Slavery and Exploitation Helpline data for 2022 records befriending as the most common way victims of criminal exploitation reported being 'recruited'.³⁴

“you've got loneliness and isolation underpinning all of this, and that need for connection. And unfortunately, if the wrong group of people find these young people at that cliff edge, it just turns into, you know, a free for all. And this is where we see our young people get taken down that other route [into criminal exploitation].”

Staff at Pure Insight

Even in the face of threats and violence the sense of belonging victims get from the criminal gangs who are exploiting them keeps them trapped.

“Police response officers in the past have been called to a property for concern for welfare, as Stockport homes believed them to be a victim of cuckooing which the victim confirmed in a prior meeting. Once at the property the response officers only asked the victim within ear shot of the visitors ‘if they wanted the people to be there’? The victim responded ‘yes they are my friends’. The officers left and closed the comms with no concerns.”

Staff at Stockport Homes

³⁴ Unseen, *Modern Slavery and Exploitation Helpline Annual Assessment 2022*, 2023

We heard about older people befriended at the supermarket or at foodbanks whose homes were eventually taken over and used for drug dealing. Bereavement can also create that emotional vulnerability preyed on by criminals who inveigle their way into someone's home.

Young people with some form of neurodiversity can find it harder to navigate relationships due to challenges in understanding social cues and communication, recognising worrying behaviour by others, and in identifying risk.³⁵ Charities told us that they are specifically targeted by gangs, sometimes pointed out by fellow students at their schools. Care leavers may have experienced trauma and neglect leaving them with mental health issues and insecure emotional attachments. This can make them susceptible to seeking that attachment in relationships that may not be healthy putting them at risk of grooming and manipulation leading to exploitation. Care leavers have described “entering ‘unhealthy’ social environments where it is easier to develop unhealthy relationships and behaviour” as one of the challenges of leaving care.³⁶

“for some neurodiverse young people who are asking ‘where is my place in society’ they see that they can fit in by wearing the right clothes and that desire makes them vulnerable to exploitation”

Head of Criminal Justice Services, Causeway

Deprivation exacerbated by the cost of living crisis

Many charities told us that deprivation and financial challenges intensified by the current cost of living crisis are a significant reason many people fall prey to exploitation. Often deprivation exacerbates other vulnerabilities increasing the risk of exploitation.

Children are seeing parents struggling financially and want to help. Some parents are aware their children are committing crime but need the money - and in some cases are even implicated in allowing their exploitation.

“One child, obviously it escalated into trafficking, but his rationale was he wanted, he had seen his friend dealing drugs... and he knew his mum was struggling for money, and he wanted to bring money into the family home.”

Barnardo's practitioners

“Money is enticing them into exploitation. It's the cost of living crisis and people using foodbanks more. Parents are aware their child is offending but they feel like they don't have a choice, ‘what else is there for young people to do?’”

Staff at a Yorkshire community organisation

³⁵ Safer Devon Partnership, *Preventing exploitation Toolkit, What is vulnerability*; National Autistic Society, *What is autism?*

³⁶ Foundations, *Care Leavers' Experiences of Emotional Wellbeing Support While Leaving Care, Peer Researcher Report, 2023*

“So that can look like smaller kinds of debts being used as a sort of debt bondage method of grooming children into exploitation ... things like a Subway sandwich, or a prime energy drink is that kind of very low sort of cost, debt that's being utilised as children are kind of desperate to have, you know, food for lunch or, or whatever else.”

Barnardo's practitioners

Deprivation combined with aspiration for a better, glamourised, lifestyle exhibited by local drug dealers in expensive cars or music videos is a potent mixture. It makes people susceptible to adverts on social media or approaches by people in their community offering ways to make money. Young people are groomed through gifts or rewards of expensive clothing, vapes and other things that parents cannot or will not buy for them. We heard of young people being given vapes, clothing and trainers, computer games consoles, and even in extreme cases cars, but in other cases it can be as small as a McDonald's meal or Subway sandwich or wanting £5 for a haircut. These 'gifts' turn into a debt which they must pay off by working for the gang, a debt that continues to grow and where exploitation escalates often accompanied by threats and violence.

“They say, look, here's some new clothes. You're 14, 15 you're getting a brand-new pair of Jordans, you're buzzing. And you think ‘yeah, I've got this. This guy gives me trainers.’ Before you know it he's asking you to pay those trainers back by holding the weapon or moving some drugs around the city or something like that. It's manipulation and difficult for children and young people to say no especially if we really understand their social standing in the community.”

Senior Service Manager County Lines Support & Rescue Service, Catch 22

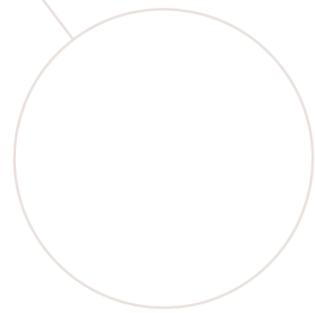
Although, there are reports of middle-class young people being drawn into exploitation often through online grooming,³⁷ research suggests that most young people who are criminally exploited in county lines are from socially and economically disadvantaged communities.³⁸

Polling with teachers revealed that 25 per cent of teachers in schools with the most deprived student body had encountered suspected criminal exploitation compared with 12 per cent of teachers at the most affluent schools.³⁹ Similarly, a quarter (25 per cent) of respondents to our general public polling from the most deprived parliamentary constituencies had seen signs of criminal exploitation in their community compared to 15 per cent in the least deprived constituencies.

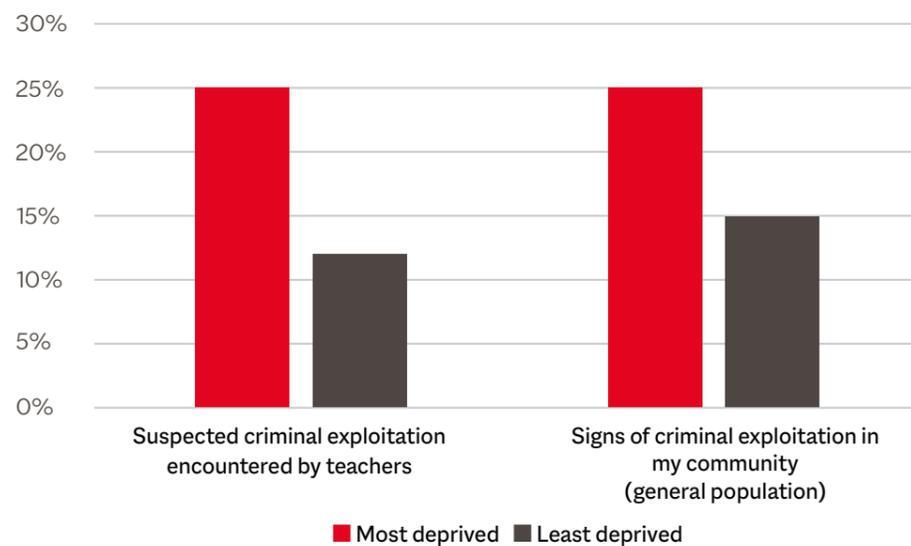
³⁷ Commission on Young Lives, *Final Report, Hidden in Plain Sight, 2022*

³⁸ James Windle, Leah Moyle, and Ross Coomber, *'Vulnerable' Kids Going Country: Children and Young People's Involvement in County Lines Drug Dealing*, Youth Justice, 20 (1-2), 64-78, 2020

³⁹ Polling of over 7,800 teachers conducted for the Centre for Social Justice and Justice and Care by Teacher Tapp on 1 November 2023. Teacher Tapp is a daily survey app that asks over 9,000 teachers questions each day and reweights the results to make them representative to reflect national teacher and school demographics



"Polling shows a quarter of people in the most deprived constituencies had seen signs of criminal exploitation in their community compared to 15 per cent in the least deprived constituencies."



For the smaller number of victims who are foreign nationals, poverty and debts owed to criminal groups for money to meet family needs back home or for passage to the UK lead them into exploitation on arrival in the UK. We heard about unaccompanied asylum-seeking children being targeted for exploitation. Insecure immigration status and a lack of local support networks compounded by threats against families back at home make it even harder to exit exploitation and can lead some victims to return to their exploiters even after being brought out.

"we see it through Vietnamese children who are in cannabis grows and are forced to work in the cannabis grows, to pay off a debt and usually a debt from either their family or back in Vietnam, or paying for their journey to the UK and also for the Albanian children as well.... where they're in cannabis grows and, again, are forced to pay a debt, which there's never an end to that debt"

Barnardo's practitioners

4. What impact does criminal exploitation have on victims?

"He cut my tongue with a razor blade for talking and said next time I'm going to get it chopped off"

Susan, a cuckooing survivor supported by Justice and Care

4.1 Devastated lives

Criminal exploitation can impact every part of someone's life. During exploitation, victims can be subjected to threats and violence that lead to both physical injuries and lasting mental health problems. In the most extreme cases, especially where young people become entrenched in such exploitation and criminal activity, some young people end up losing their lives.⁴⁰ Trauma resulting from criminal exploitation can lead to self-harm and ongoing PTSD and other conditions.

"[Some of our tenants] were controlled to the extent that they weren't allowed to eat anything. One victim, the criminals smashed all his crockery, so he had nothing to eat off, let alone any food. The gang controlled his access to the chemist so he couldn't get his prescription [for methadone] so he had to use illegal drugs and get them from the criminals controlling him."

Staff member at Livin Housing Ltd

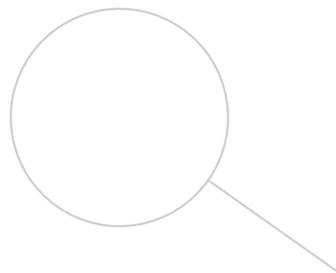
"He cut my tongue with a razor blade for talking and said next time I'm going to get it chopped off."

Susan, a survivor of cuckooing supported by Justice and Care.

Younger victims' absence from education due to exploitation leads to a lack of qualifications which in turn creates a huge obstacle for their future life-chances, and risks entrenching exploitative and/or criminal behaviour.

"And ultimately from a school point of view, you see the impact on young people that are not getting qualifications. They're struggling to be accepted into college because they can be deemed too high risk to be in college, so you have that cycle, which is being perpetuated because they can't get the qualifications."

Staff at Avenue Centre for Education



⁴⁰ The Child Safeguarding Practice Review Panel, *It was hard to escape - Safeguarding children at risk from criminal exploitation*, 2020

Where victims have been exploited in their own home, they may feel that the only way out is to leave their property, becoming homeless, often sleeping rough. Others may need to be relocated away from family and other local connections to protect them from continued exploitation. Not only is this not straight forward to arrange (see chapter 6) it is very disruptive and can put people at quite a distance from friends, family, work or GPs and other support systems. Financial problems can also be a legacy of this type of exploitation, with financial exploitation often connected to criminal exploitation.

Case study - Huddersfield Welcome Centre

Bernard was struggling with drugs and alcohol for many years. He was in and out of prison since leaving school but with support from both The Welcome Centre and Huddersfield Mission, he was able to focus on a clear fresh start after his last release from prison.

He seemed to be doing really well but unfortunately relapsed. He started going downhill quickly and was unable to repay his drug debt, so his drug dealer took control of his property. The property was turned upside down and Bernard felt so unsafe he had no other option but to sleep in a tent in a nearby park.

Due to Bernard having his own tenancy the rough sleepers team found it difficult to support him as Bernard was reluctant to inform anyone what was going on in his home.

Bernard finally found the courage to seek help and with the help of the rough sleeper's team and The Welcome Centre, Bernard was rehoused and re-engaged with addiction support.

Perhaps the greatest impact of all arises out of criminalisation. Victims of exploitation who are not identified as such, go on to be prosecuted and convicted of criminal offences. Criminal convictions present a considerable barrier to employment and there is a lot more to be done to enable offenders to enter meaningful and sustained employment on leaving prison.⁴¹ Prison can also be a place where patterns of exploitation are entrenched and where victims are drawn further and further into criminal activity, sometimes progressing up a gang's hierarchy until they are the ones responsible for exploiting others.

⁴¹ Centre to Social Justice, *Unlocking Aspiration - Breaking down barriers to work for people leaving prison*, 2023

4.2 Victim, criminal, both?

By its very nature, victims of criminal exploitation are involved in crime. This can lead to problems identifying victims and responding appropriately. Put simply, is someone a victim of exploitation, or a criminal offender, or both? How should those lines be drawn? And how well equipped are our criminal justice and support systems to handle this complexity?

Many victims of criminal exploitation do not recognise that they are being exploited. For many of them the behaviour has become normalised, especially in cases of intergenerational exploitation, and they believe their exploiters to be their 'friends'. A victim might initially participate in criminal activity willingly only to later face escalating threats or find themselves so deeply embedded in organised criminal activity that they do not know how to get out. Still others are unwilling to say that they have been exploited out of fear or social pressure.

"Young people in some of the communities do not engage with the police - even if it is their friend who has been a victim of an assault. Some are fearful for their safety, for some they take it as a norm to not work with the police."

Police Officer, Northumbria Police

"cognitive dissonance is powerful... like all children, those who are exploited want to see themselves as respected and loved. It may cause further trauma to insist to them they are a victim and their relationships may not be what they thought they were. It damages their sense of self and may make them feel worse about themselves. That's not to say we shouldn't treat them as a victim, just that we need to understand the impact of this on the way we work with young people."

Staff at British Transport Police

Some young people, even whilst being exploited, may still receive material or financial benefit from the criminal activity such as new trainers as part of a 'grooming' process or a cut of drugs' profits. This can mask the exploitation, both to them and to the professionals they come into contact with.

"Police tend to think someone with a big bag of drugs on them is guilty. We're seeing the same type of prejudices that were seen with Child Sexual Exploitation cases where the girls were seen as troublesome and difficult...So now in Child Criminal Exploitation you have young lads who don't want to play ball, don't want to talk to police, probably giving it a lot of attitude, presenting themselves as the 'big man', probably with a degree of misplaced loyalty [to the gang] and don't trust the police to protect them, so they don't say anything."

Colin Carswell, Modern Slavery Consultant

Many charities we spoke to said that the police had got better at recognising that young people involved in criminal activity may be doing so because of exploitation. However, we heard that the older a young person gets, especially once they turn 18, the more likely it seems to be that they will be treated as an offender rather than a victim of exploitation.

“We are finding police operating an age-based triage – almost deciding if a young person is a victim based on their age”

Staff at St Giles Trust

We also heard of many victims who have continued to be charged and prosecuted for offences (often drugs offences), without thorough investigation of the possible indicators of exploitation. This is despite CPS guidance to consider whether a person may be a victim of modern slavery and the statutory defence under section 45 of the Modern Slavery Act 2015.⁴² Professionals working with cuckooing victims told us that they had seen the police treat victims as typical drug dealers not seeing them as a victim and reflected that the officers investigating seemed reluctant to complicate their investigations and reduce the chances of getting a conviction. Just as our understanding of domestic abuse has increased over recent decades, we need the same awareness that someone can be a victim of criminal exploitation whilst denying they have been exploited.

“With modern slavery investigations, we seem to be where domestic abuse investigations were 10, 15 years ago, which is you’ve got to have a victim, you’ve got to have a statement, you’ve got to have someone come and present their evidence in court. And everyone’s got to be on board, we finally realised that that’s ridiculous. If you’ve got a 999 call, if you’ve got neighbours call in if you’ve got visible injuries, use the evidence to prosecute the suspect. We are not doing that with modern slavery.”

Police Officer

The imperative has to be on all agencies, not just the police, who might come across someone in this situation to be equipped to identify the signs of exploitation and respond accordingly even when a victim is unwilling to make a complaint. Lee, a survivor of cuckooing who struggled to get the police to help, told us that victims just need ***“someone to talk to the police for them and make them listen.”***

When someone is not recognised as a victim, they can end up drawn further and further into greater exploitation, and/or escalating to committing the most serious and violent offences.

The uncomfortable truth is that many victims of this type of modern slavery are both victims of exploitation and criminal offenders. Knowing how to respond can be complex, and measures aimed at protecting victims can in some cases have unintended harmful consequences.

In some cases, victims commit very serious offences, including modern slavery offences exploiting others in the same way they were exploited. Discussing a recent case where young people under

⁴² Crown Prosecution Service, *Modern Slavery, Human Trafficking and Smuggling, Guidance, Legal International and organised crime*, Updated 6 July 2022

the age of 18 were charged with modern slavery offences for exploiting much younger children, staff at British Transport Police told us ***“It was a moral dilemma but we have to go where the evidence takes us”*** and ***“In our many debates about prosecuting older children for modern slavery we considered these issues [such as adverse childhood experiences and other mitigating factors]. But my point of view is that we do have to hold children to account and there is a point where if they are causing harm to others and if the evidence we have is only of them exploiting others, we have to hold them to account. Others may disagree with us on that. But I feel quite comfortable that we have considered it from all sides. It will be for the judge and jury to decide.”***

There are some indications that criminal gangs are taking advantage of protocols to protect victims from prosecution by specifically encouraging people (especially young people) to raise the statutory defence under section 45 of the Modern Slavery Act or by preying on younger and younger children knowing that they will be more likely to be treated as victims.

“you’ve got on the one hand, some of the young people who are really fearful of repercussions, saying ‘I won’t be a grass, I’ll go to custody for this, I have not been exploited. I’ve done this on my own free choice.’ You’ve got that side of it. And then you’ve got the other side, where perhaps you’ve got your first time ever being arrested. They’ve been prepped, and they’ve said, ‘I have been exploited.’ ...and that’s all they will give you as well. So we’ve seen both sides of it.”

Youth Justice Service Staff at Swansea Youth Justice Service

But rather than a ‘get out of jail free card’, the result is that for many this just means the cycle of exploitation and criminality continues. The intention of the statutory defence is to avoid adding to the harm already done to the victim by the exploitation they have suffered. Unless a person is willing to self-identify as a victim and engage with support, applying the defence or discontinuing an investigation or prosecution can just leave them stuck where they are.

“we absolutely advocate that people should not be criminalised when they’re being exploited. That shouldn’t happen. The flaw is that where offences are withdrawn, a young person then can walk away with no expectation of working with us to have that support.... And there’s one case very recently, where a young person has said, you know, as soon as the bail conditions are lifted, they won’t be working voluntarily with us. But we know that the same person is absolutely being exploited. And we know how vulnerable he is.”

Youth Justice Service Staff at Swansea Youth Justice Service

These dilemmas are compounded by delays in NRM decision-making which can leave police investigations, and victims in limbo waiting for an NRM decision before investigations proceed after the statutory defence is raised. In the NRM statistics for July – September 2023 (latest available) the average waiting time for a final (conclusive grounds) decision was 530 days.⁴³

⁴³ Median average. The annual median average waiting time has been over 300 days since 2018 and over 400 days since 2021. Home Office, *Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 3 2023 – July to September, 2023*

5. The ripple effect

Likewise, different procedures in the criminal justice system for dealing with suspects compared with victims or witnesses mean police cannot formally treat someone as a victim and a suspect at the same time as there are different legal rights and processes. It is unsurprising that this binary process results in a binary 'victim/offender' mindset if officers lack awareness of criminal exploitation. These processes can make prosecutions more challenging. We were told that statements made by a victim during a police interview when they were being treated as a suspect are not admissible as 'witness' evidence in court against their exploiter (witnesses must affirm they believe their statements to be true whereas there is no such obligation for suspects interviewed under caution). If a victim is unwilling to support prosecution of their exploiter and give a further witness statement (as is often the case whether from fear or unwillingness to identify as a victim), police and prosecutors can be left with no victim testimony to support the prosecution.

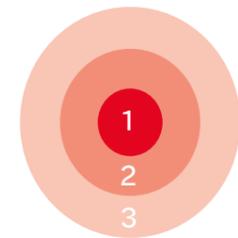
"Victims of cuckooing need someone to talk to the police for them and make them listen"

Lee, a survivor of cuckooing

Criminal exploitation affects far more than just the individual victim. The ripples of this exploitation spread outwards from those closest to the add victim to our communities at large.

5.1 Nearest and dearest

The impact on those closest to the victim, to their family and friends, is immense. Some parents may only discover their child's exploitation by finding drug paraphernalia in their room and that can be quite frightening and put them on a bewildering path trying to support their child. Family and friends of people who have had their home taken over through 'cuckooing' can be threatened or too afraid to visit the victim damaging the relationships and mental health of both the initial victim and their family as a consequence.



- 1 family, friends, boy/girlfriend, victims of crimes
- 2 neighbours, classmates, local community, other local young people, local businesses
- 3 public resources, organised crime rates, proliferation of illegal drugs

Case study - Calderdale Smartmove

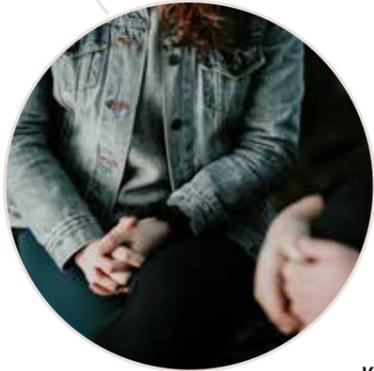
We had an elderly client who lived alone and a group of young people discovered that he was lonely. Initially, they started going round and offering to do his shopping. He would give them cash, but they never turned up with the shopping. They just kept the money. This became more and more frequent. They then started taking items from his home to sell (including his mobility scooter). This then turned into using his home for other means.

We became involved and started looking after him, but he didn't want any authorities being involved. We started doing his shopping, looking after him and his home and things like replacing his mobility scooter.

We couldn't, however, completely stop people from using him because of not being able to involve the authorities. His mental health got worse and worse and he was completely isolated. Due to the people using his home his family couldn't visit him and he didn't dare leave. His family couldn't even go and pick him up due to the threatening behaviour of the people using him.

Responsibility for debts used by gangs to control victims can be transferred onto parents or girlfriends/boyfriends/partners and wider family. These are not debts that can easily be paid off with additional sums added by the gangs at will. Family homes may be broken into, and property damaged, and parents and siblings physically threatened by the criminal gangs demanding payment of debts or to coerce a victim to comply. Whole families may need to be relocated to protect the victim and the wider household which is very disruptive and takes siblings and parents away from their own friends and support systems.





“The brazenness of the gangs around debt is scary, they used to be violently active at night away from cameras. ... Now they don’t care, there is no deterrent. Recently at two o’clock in the afternoon a gang has gone into a house looking for a young person who owes them a debt. They will attack anybody in the house without a second thought until they get an answer or money, the debt doesn’t just impact one person, it impacts a family. The brazenness that they’re just willing to put on a balaclava and run into people’s houses, smash them up, get what they need and go, is scary.”

Senior Service Manager County Lines Support & Rescue Service, Catch 22

Friends and siblings can be drawn into exploitation just by association with the first victim, or sometimes the victim is coerced or groomed into actively recruiting siblings or friends. Even if not pulled into exploitation themselves, siblings’ needs can often be neglected by parents preoccupied with concerns about the child experiencing exploitation.

“one of the ripple effects you see in the family is often the effect on siblings, because suddenly you’ve got parents that are having to spend a lot of time focusing on the issues with this older child or middle child and then sometimes you’ve got younger children that have needs of their own, might have special educational needs, that are suddenly exacerbated by this kind of thing.”

Community Safety Coordinator for Brighton & Hove City Council

Another group of people who are directly impacted by this exploitation are the victims of the crimes carried out by those being exploited. Individuals are having property stolen, businesses are losing stock through shoplifting and robberies and these thefts are sometimes committed with intimidation and violence that can leave a lasting impact beyond the financial loss.

5.2 Neighbours and local community

Criminal exploitation can leave communities living in fear. More than half (55 per cent) of the people polled for this report were worried about criminal exploitation whether they had seen signs of it in their community or not.⁴⁴

Neighbours of those being exploited through cuckooing experience serious disruption, anti-social behaviour and intimidation. In fact, often it is the anti-social behaviour reported by neighbours that first alerts housing providers or police to the issue (and can be a reason victims are initially perceived as perpetrators not victims).⁴⁵ When a victim’s home is taken over there are often people constantly coming and going from the property and hanging around outside and can act in a threatening manner. Litter and drug related items are left around the property and noise creates a lot of disturbance for others living nearby.

⁴⁴ Polling of a nationally and politically representative sample of 2,050 adults in the UK conducted for the Centre for Social Justice and Justice and Care by Opinium, fieldwork 25-27 October 2023.

⁴⁵ Stephen J. Macdonald, Catherine Donovan, John Clayton & Marc Husband, *Becoming cuckooed: conceptualising the relationship between disability, home takeovers and criminal exploitation*, *Disability & Society*, 2022, DOI: 10.1080/09687599.2022.2071680

“The [cuckooing of their neighbour] caused extreme distress to residents and child; the child now wets the bed every night due to the concern”.

Police Officer, Surrey Police

Parents in some communities live with fears that their children will be exploited by the organised crime gangs they know are operating in their area which can impact on what they let their children do and how they live. Violence between organised crime groups involved in exploitation can spill over into local streets. This puts local people at risk of being caught in the middle and witnessing this violence can create fear for people just going about their daily lives.

“In our community survey we got a lot of feedback from mums, saying it was not safe to let their children out. We didn’t realise just how much they were frightened for the boys going out because they were going to be exploited. Criminal, sometimes sexually, but mostly drug dealing.”

Police Officer, West Yorkshire Police

It can also affect the way that all young people in a community are treated by their neighbours even if they have nothing to do with criminal activity. That can cause a breakdown in relationships within a community and leave young people feeling even more disenfranchised and even at risk of seeking that affirmation within a gang.

“Once this is happening in a community, any young person in a community is viewed as a criminal. They aren’t trusted and are treated with suspicion.... We have had situations where the community have called for the police because young people just hanging out in the park. It creates mistrust between the community and young people, makes them feel they aren’t accepted and can push them towards places where they do find acceptance which might be in a gang.”

Staff at a Yorkshire community organisation

Anti-social behaviour and crime make a community less pleasant to live in, but they are also known to reduce house prices meaning people may find it hard to sell or rent their property due to concern about the locality.⁴⁶

There is also a risk that in some communities levels of criminal behaviour become so normalised that all hopes and aspirations for something better are lost, that trust and relationship with police and other authorities has broken down and cycles of deprivation, criminality and exploitation repeat and repeat.

⁴⁶ Nils Braakmann, *The Link between Crime Risk and Property Prices in England and Wales: Evidence from Street-Level Data*, *Urban Studies* 54, no. 8 (2017): 1990-2007.

“Some of our tenants see it as being ‘normal lived experience’ being around this sort of criminality. There is an extreme level of tolerance that communities come to when they see this kind of organised criminality happening. They feel that it is unsolvable...someone might be arrested by someone else takes their place...Communities only start talking to you when it gets so uncomfortable that it is unbearable because the consequences of being seen as a ‘grass’ are high, people can come to serious harm.”

Staff member at Livin Housing Ltd.

Neighbours or landlords of properties that are used for growing cannabis (a common site of criminal exploitation) can be at specific risk related to the use of electricity to power heat lamps for the cannabis plants. These sites often steal electricity by tampering with meters or connecting illegally to the grid. There is also a high fire risk with improvised connections made to the grid or overloaded circuits and properties can also be affected by mould and other damage. As well as the risks to health and life of those living nearby repairing the damage can be costly.

5.3 Spreading out

A wider circle of impact reaches beyond the immediate locality to the wider community and even the country as a whole.

There is a financial and resource drain on public services that results from the organised criminality connected to exploitation. The Fire Service and National Grid have to divert resources into dismantling cannabis grows and making them safe. Local councils and housing providers expend money repairing social housing properties damaged through cuckooing and in rehousing victims who need to be relocated. One housing provider, Stockport Homes, told us that **“we try to keep the victims of cuckooing in their homes where possible, to keep them close to support services, and support networks. This in turn saves the void costs which are around £3,000.”** Victims who have been exploited may need to access ongoing NHS and other social care services including specialist substance misuse and mental health services. Not to mention the police resources expended in fighting the crime.

But this broader impact goes much deeper than finances. Organised crime groups (OCGs) involved in criminal exploitation use it as a way to maximise both profits and control. This enables the OCGs, their operations, profits and influence within our communities to grow with the risk that the resulting harmful impact of drug use, violence and other criminality also increases. Some of the frontline experts we spoke to expressed concern about the potential consequences for the UK if these organised crime groups are not adequately disrupted.

When it comes to the impact of criminal exploitation, though, we cannot ignore the role played by the wider community in enabling exploitation too. A large proportion of criminal exploitation takes place in the context of supplying illegal drugs and those who consume these drugs recreationally must accept some degree of responsibility.

“in the cities it is middle class drug use that has a part to play. Even some professional people working in systems to disrupt this [modern slavery] issue may be part of the problem because they may be buying cocaine at the weekend. There is a lack of honesty about that.”

Police Staff

6. Breaking the cycle of criminal exploitation and building a better future

“A stable family [is really important], my dad was missing for nearly six, seven years of my life...my mum was working three jobs.”

Nelson Omoragon, Lived Experience Consultant

Preventing people becoming victims of criminal exploitation is far preferable to even the best support structures to help them afterwards. However, some criminal exploitation will undoubtedly still occur. At present, the levels of vulnerability and risk are such that we need a twin track approach: improving the response when criminal exploitation does happen to make sure victims are identified and supported, and prevention work to break the cycle of exploitation for the long term.

6.1 Recognising victims and tackling perpetrators

The first step to a better response when exploitation does take place is to ensure that victims are being identified and that those exploiting them are pursued, disrupted and prosecuted effectively.

Identifying victims

As already outlined above, we heard many professionals express deep concern that victims of criminal exploitation are still being prosecuted as criminals, especially older teenagers and adults, rather than recognised as victims.

Awareness of this type of exploitation, especially concerning children, has grown among the police. Several charities noted that there were positive developments in police understanding and specialist programmes and partnerships in place. It is clear that specialist modern slavery or county lines officers are well versed in criminal exploitation, but many cases will never be escalated to these specialist officers and will instead be dealt with by community policing and local CID. Too often these officers do not look beyond the presenting criminal situation to consider or investigate whether the suspected offender may in fact be a victim of exploitation. Several people suggested to us that many such officers have limited understanding of exploitation and modern slavery offences and in particular, how the Modern Slavery Act offences can apply.

“From a policing point of view, especially for officers with 25 plus years in policing, often they don’t understand criminal exploitation or that the Modern Slavery Act applies. ... I have had conversations with police officers who just see it as someone dealing drugs, they don’t consider or understand the possibility of exploitation.”

Police Officer, British Transport Police

In December 2023 the Home Affairs Select Committee reported that “*Criminal exploitation is the most reported form of human trafficking and modern slavery, but there is insufficient training for law enforcement personnel in victim recognition and inadequate support for victims of criminal exploitation.*”⁴⁷ Training and guidance need to be increased to ensure that all officers who might come across criminal exploitation are equipped to identify it.

Some of the charities we spoke to suggested that one reason child victims of criminal exploitation are not consistently identified is the lack of a statutory definition of child criminal exploitation. Many charities in the children’s sector have been advocating for such a definition for a number of years. They argue that although there are various definitions in different pieces of guidance the lack of a single definition leads to confusion among professionals, poor data collection and inconsistency in the response. The definitions that do exist relate specifically to child criminal exploitation meaning that criminal exploitation of adults is even less well described. Some charities have recommended amendments to the Modern Slavery Act to refer to child criminal exploitation, more recently proposals have been made to add a definition to the Victims and Prisoners Bill.⁴⁸ In January 2020, Her Majesty’s Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) recommended that the Government should put the definition of child criminal exploitation in the Serious Violence Strategy (or an amended version) on a statutory footing by the end of that year.⁴⁹ More recently, the Home Affairs Select Committee has reiterated its call for the Government to consider adopting a statutory definition of child criminal exploitation.⁵⁰ Other charities have recommended a stand-alone offence of grooming or coercing a child into criminal activity pointing to Australia’s state level ‘Fagin’s laws’ and the similar law recently introduced to parliament in the Republic of Ireland.⁵¹

However, we have some concerns that a statutory definition of ‘child criminal exploitation’ alone may risk entrenching patterns that younger children are more readily identified as victims of exploitation and that once someone turns 18 they are not seen as a victim of exploitation and are held fully criminally responsible. Section 3 of the Modern Slavery Act 2023 provides a definition of ‘exploitation’ for the purpose of the human trafficking offence in section 2. However, it does not give a definition of criminal exploitation. Criminal exploitation is covered by the parts of the definition relating to securing services or benefits by force, threats or deception or from children and vulnerable adults by exploiting their specific vulnerability.

The specialist police officers we spoke to said that the Modern Slavery Act was sufficient to prosecute this type of exploitation, but acknowledged that many victims, police officers and the general public still do not associate the term ‘modern slavery’ with this sort of crime and the term ‘exploitation’ might be easier to understand.

Professionals working with young victims, however, emphasised that most did not recognise what was happening to them as ‘exploitation’ and stressed the need for other definitions in language that are more descriptive, allowing victims to see themselves in that depiction.

⁴⁷ House of Commons Home Affairs Committee, *Human Trafficking, First Report of Session 2023-24, HC 124, 2023*

⁴⁸ The Children’s Society, *Counting Lives, 2019*

⁴⁹ HMICFRS, *Both sides of the coin: The police and National Crime Agency’s response to vulnerable people in ‘county lines’ drug offending, 2020*

⁵⁰ House of Commons Home Affairs Committee, *Human Trafficking, First Report of Session 2023-24, HC 124, 2023*

⁵¹ Criminal Justice (Engagement of Children in Criminal Activity) Bill 2023

Recommendation 1

The Government should amend the Modern Slavery Act 2015 to make it work better for criminal exploitation, amending the Act as follows:

- Amend the title of the Act to the ‘Modern Slavery and Exploitation Act’;
- Amend section 3 of the Act to specifically add criminal exploitation as a form of exploitation and including a definition of criminal exploitation;
- Amend Part 2 on Slavery and Trafficking Prevention Orders and Risk Orders as we have previously recommended to make imposition of an STPO mandatory on conviction for MSA 2015 offences and to require notification of an offender’s name and address as part of all STPOs and STROs (creating a national register for modern slavery offenders—similar to the sex offenders register). Also to allow imposition of orders on acquittal for modern slavery offences and conviction for other related offences where exploitation is indicated; to empower the Chief Constable of British Transport Police to apply to the court for orders to be made, varied, discharged or renewed; and allow police forces to apply for orders in respect of individuals not residing in their force area.

Recommendation 2

Training on criminal exploitation of both adults and children must be embedded in core training for professionals likely to come into contact with victims.

- This must be mandatory training and start early, with modern slavery and criminal exploitation courses embedded within both professional qualifications and inductions into post.
- The training should help professionals spot the signs of criminal exploitation and know what to do when they identify it, including making clear that it is a form of modern slavery and clarifying how statutory responsibilities under the Modern Slavery Act and other related responsibilities under the Children Acts and the Care Act apply.
- The training should cover police officers, social workers, housing officers, teachers, NHS staff, official ‘Appropriate Adults’ supporting those in custody, HM prison and probation staff, but also staff delivering commissioned services. Local Authority commissioning and assurance processes, including service-level agreements and contracts, must ensure that organisations and individuals who are delivering services for them know how to spot signs of criminal exploitation and other forms of modern slavery and how to report them.

Criminalising cuckooing

One type of criminal exploitation that does not fall within the Modern Slavery Act offences is cuckooing as our previous research has identified.⁵² The absence of movement puts it outside the section 2 human trafficking offence and unless the victim is forced to perform some other labour (such as dealing drugs) the CPS have told us the section 1 offence does not apply.

“we’ve delved into the process of cuckooing in the past and where that actually fits within the legislation, and it doesn’t really fit anywhere.”

Police Officer, West Yorkshire Police

We have previously recommended that cuckooing should be a specific criminal offence, and in our view, it is a form of modern slavery. We have heard from some cuckooing victims who struggled to get the police to take action. In other places although the police are seeking to take action, the closure orders, drugs offences or organised crime offences available to them do not address the harm done to the victim and may not fit all circumstances of cuckooing. In the case of closure orders, this is a civil law tool effectively imposed against the victim and their residence (even if it is done for their benefit). They do not hold the perpetrator of the exploitative and threatening conduct criminally liable unless the order is breached. Offences of controlling and coercive behaviour also only apply if there is a family or intimate relationship between the victim and offender. At the time of conducting this research the Home Office was conducting a stakeholder engagement on the possibility of introducing a specific criminal offence of cuckooing. Many of the police officers we spoke to for this research welcomed the proposal. However, no offence of cuckooing was included in the Criminal Justice Bill introduced to Parliament in November 2023.⁵³

“Hopefully there will be a change in legislation around cuckooing. If that gives us more powers it would be really beneficial.”

Police Officer, Greater Manchester Police

Recommendation 3

The Government should create a specific offence to criminalise the act of cuckooing as a form of modern slavery (see our previous reports *Cuckooing*, 2021 and *Slavery at Home*, 2023).

The provision should:

- ensure victims have access to support and special measures in court as modern slavery victims,
- ensure those offenders who are themselves victims of modern slavery are able to access the statutory defence,
- should be identifiable in recorded crime and court statistics.

⁵² Centre for Social Justice and Justice and Care, *Cuckooing*, 2021; Centre for Social Justice and Justice and Care, *Slavery at Home*, 2023

⁵³ <https://bills.parliament.uk/bills/3511/stages/18032> <https://bills.parliament.uk/bills/3511/stages/18032>



The problem is not just a lack of awareness, but also limited time and resources with pressure to resolve cases quickly. Drugs offences or theft offences are far less complicated and much easier to evidence than exploitation. These crimes can usually be easily demonstrated by physical evidence such as drugs or cash and do not require proof of coercion or manipulation on the part of the exploiter.

“People still struggle to see victims as victims, I think a lot of forces are still pursuing them as offenders... it is a lot of work to get the evidence... people almost don’t want to open that door because of the complexity, time and work involved.”

Staff at British Transport Police

Our interviews show that the findings of research by the Independent Anti-Slavery Commissioner’s office in 2020 remain true: “Police are not consistently considering from the outset of an investigation whether the suspect could be a victim of trafficking and whether the statutory defence may apply.”⁵⁴

“But in my caseload [of statutory defence cases] I’m seeing a lack of police investigation into modern slavery. There seems to be a huge reticence of police to treat it with the seriousness it deserves. What we are seeing is: there are indicators of modern slavery present, the police will refer the victim into the NRM but too often that seems to be perceived as the extent of their obligations... For example, in one case a County Lines case, the victim or suspect was 17 at the time of the offending, there were 44 separate entries on the investigation log for the ‘Possession with Intent to Supply’ offence he was accused of, compared to 7 entries in the investigation log for the allegation of modern slavery. There was just no real investigation.”

Colin Carswell, Modern Slavery Consultant

If victims fall through the net, Crown Prosecution Service guidance and the statutory defence under section 45 of the Modern Slavery Act should provide other prompts to ensure proper investigation and consideration of whether someone is a victim of exploitation and if investigation/prosecution should be stopped. No data is collected about the use of the statutory defence, so it is unclear how often this is used and in what circumstances⁵⁵ Nor is there data on broader decisions by the CPS not to prosecute because a suspect is a victim of exploitation. We asked the CPS how often when following the prosecutorial four stage assessment process they decide not to continue with charges or prosecution because the suspect is a victim, but they were unable to provide this information as it is not collated centrally saying:

⁵⁴ Independent Anti-Slavery Commissioner, *The Modern Slavery Act 2015 Statutory Defence: A call for evidence*, 2020

⁵⁵ Modern Slavery and Human Rights Evidence Centre and Wilberforce Institute, University of Hull, *Evidence Review of Section 45 of the Modern Slavery Act: Background and Context*, 2022

“The CPS does not hold data on cases where the suspect / defendant has raised their trafficking status and which subsequently resulted in a decision to continue to prosecute or to discontinue the case” and also “whilst we have certain ‘codes’ that are assigned to decisions not to prosecute or to drop charges, these are broader than would allow us to identify those where the decision was specifically related to the status of a suspect or defendant as a victim of human trafficking/modern slavery.”⁵⁶

Beyond a lack of data, there are procedural issues with the interaction between the statutory defence process, the NRM and police investigations. We were told that police seem not to be investigating possible exploitation until a conclusive grounds decision has been made by the NRM (which can be a serious delay). This is a missed opportunity since police evidence would no doubt be relevant and important for NRM decision-making. It may result from the procedural issues raised above where the criminal justice system cannot treat a person as both a victim and a suspect at the same time and a reliance, in the past, on NRM decisions as evidence of whether a person is a victim for the purposes of the statutory defence. In 2021, the Court of Appeal ruled in *R v Breani* that an NRM conclusive grounds decision is not admissible as expert evidence of modern slavery in a criminal trial.⁵⁷ The Breani ruling provides an added impetus for thorough investigation by police of any allegation or indicator of exploitation, but it will require police to have the necessary awareness and training on modern slavery and criminal exploitation specifically.

The perverse result of continuing prosecutions can mean not only that victims of exploitation are being prosecuted but that they may be forced to stand trial alongside those who have been exploiting them. We heard about one case where the co-accused were all charged with drug-related crimes, but one was also charged with the trafficking and exploitation of one of the other defendants. This puts that victim at extreme risk without any of the safeguards against reprisals from the exploiter that would normally be provided to a victim of exploitation.

A separate issue is whether a decision not to prosecute or the successful use of the statutory defence actually results in the safeguarding of the victim concerned. As mentioned in chapter 4 above, many victims do not see themselves as victims and/or are too afraid to make that allegation. The purpose of these protections is to prevent additional harm caused by criminalisation and if victims remain in continued exploitation this has not been achieved. Improving recognition of victims within the criminal justice system is incomplete if it does not lead to interventions to safeguard those victims. Dropping of criminal charges alone is not enough. We have been advised that where a case has been dropped any orders requiring a young person to engage with youth offending teams come to an end and it would not be possible to compel continued engagement. However, at the very least these young people should be referred to an independent expert charity providing an opportunity for continued work to help them exit the exploitation and criminal activity.

If police are not consistently investigating the possibility that a suspect might be a victim of criminal exploitation, that means lots of exploiters are being allowed to continue coercing and grooming vulnerable people into crime with impunity. If a victim of criminal exploitation is prosecuted and convicted there are plenty more vulnerable people for criminals to exploit in pursuit of their

⁵⁶ FOI response ref 11592 received 23 October 2023 and FOI response ref 11652 received 16 November 2023

⁵⁷ *R v Breani* [2021] EWCA Crim 731

criminal profits. If prosecution is dropped against a victim of exploitation, but no investigation and prosecution brought against the exploiter, again, the criminal exploitation of that victim or others, and the associated offending, will continue.

Recommendation 4

Every opportunity must be taken to safeguard potential victims of criminal exploitation identified in the criminal justice system. The Home Office should update the guidance ‘Criminal exploitation of children and vulnerable adults: county lines’ and the Modern Slavery: statutory guidance for England and Wales (under s49 of the Modern Slavery Act 2015) to set out a clear referral pathway to local charitable diversion programmes for young people exiting youth justice services because a prosecution has been dropped due to the young person being a victim of criminal exploitation.

Recommendation 5

To identify challenges and ensure good practice in the response to victims of criminal exploitation in the criminal justice system:

- HMICFRS should conduct an inspection into the identification and treatment of victims of criminal exploitation and pursuit of their exploiters by police forces highlighting best practice and areas for improvement.
- The Home Office and Ministry of Justice should require collection by the CPS and Police Forces of anonymous data on the number of individuals raising the statutory defence and outcomes in those cases, and the number of CPS decisions not to prosecute on the grounds that a person is a victim of modern slavery, whether or not the statutory defence has been raised. The data should be published annually.

Faster and better NRM decisions

The NRM is the formal process for identifying victims of modern slavery and for adults is the gateway to support. Local authorities that are part of the current pilots of devolved NRM decision-making for child victims already seem to have more information about victims of criminal exploitation that could help lead to better prevention and identification of future victims. People working in more than one of those areas also told us that they felt the devolved model had shown benefits that were relevant for criminal exploitation: faster decision-making means that the young person is not kept waiting as long with the prospect of possible prosecution hanging over them. Home Office data shows that from June 2021 to September 2023, 54 per cent of children within

the pilot had reported criminal exploitation. The data also shows that the average (median) time taken for children in the pilots to receive their final 'conclusive grounds' decision was 58 days compared to 256 days for children not in the pilot.⁵⁸

We were also told that participation in multi-agency decision-making processes have given some police officers a more nuanced perspective than the simple binary offender/victim paradigm.

“The devolved decision-making pilot has brought about smart conversations between police and social care about what it is to be a victim and how that can involve doing ugly behaviour including risk of serious harm to other people, but it’s because they are being exploited.”

Police Staff

Recommendation 6

The Home Office should publish an evaluation of the devolved NRM decision-making pilots for children, complete a full national roll out of devolved decision-making by 2025, and undertake a scoping exercise to expand the approach to adults

Prison

Prison can be a place where victims of criminal exploitation end up, or where they are drawn into exploitation. At the moment neither identification nor educational activities in prison are adequate to prevent cycles of exploitation continuing.

“a lot of young people or a lot of adults are literally waiting to be released and then they’re going back to the same stuff and no support or nothing is addressed while being in prison.”

Sosa, HTF Lived Experience Advisory Panel

The Regional MSHT MARAC coordinator for modern slavery MARAC (Multi-agency Risk Assessment Conferences) in Wales told us about work they are doing with the prison service in Wales to offer support if victims of modern slavery are identified in prison, to facilitate referral into the NRM and possible support to the victim via external agencies prior to their release from prison. All prisons in Wales now have staff designated as modern slavery single points of contact (SPOC) who are linked to the MARAC coordinator. This provides two-way communication with prison staff both to ensure NRM referrals are made for people in prison who may be a victim of modern slavery, and also to ensure the prison staff know which prisoners are possible victims in order to provide additional support whilst in prison. It also allows for referrals to be made to the MARAC process and NRM to ensure pathways to support are in place when a potential victim is released from prison.

⁵⁸ Home Office, *Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 3 2023 - July to September Annex: analysis of the devolved decision-making pilot for child victims of modern slavery*

“In the prisons, they don’t get notification if someone is in the NRM. So what I do on a weekly basis is because I get a notification of all those who are in the NRM in South Wales, I’m able to link in with the dedicated prison liaison officer to say, ‘this is the list of individuals who’ve got positive Reasonable Grounds [decisions] who are currently on remand.’ So that additional support within the prisons can be provided. So, when we’re working a lot more closer, and like I said before, more referrals are being made into the MARAC process by the probation and prison service.”

Welsh Regional MSHT MARAC coordinator

Recommendation 7

The Home Office and the Ministry of Justice should smooth the pathway for victims into the NRM and MSVCC support from prison by:

- Making HM Prisons and Probation Service a First Responder able to refer prisons to the NRM;
- Providing training for prison and probation staff on modern slavery, the NRM and specifically criminal exploitation so they are able to identify potential victims and connect them with support;
- Establishing a clear pathway for potential victims to be referred to the MSVCC so a support plan and connection can be made prior to a potential victim’s release from prison.



Tackling perpetrators

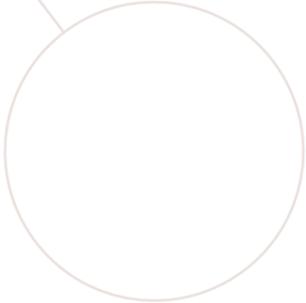
A lack of comprehensive understanding of criminal exploitation as a form of modern slavery and the challenges of modern slavery investigations which are more complex and are more resource intensive leads to a situation where offenders involved in criminal exploitation are still more often prosecuted under drugs offences rather than the Modern Slavery Act.⁵⁹

In response to our Freedom of Information request the CPS told us that between January and June 2023 there were 47 prosecutions and 24 convictions on an all offence basis for Modern Slavery Act offences related to criminal exploitation. Even though one offender can exploit multiple victims, this is a tiny number compared to the over 2,000 live modern slavery investigations for criminal exploitation reported by the MSOIC Unit as of December 2022,⁶⁰ and the over 4,000 NRM referrals for criminal exploitation based in the UK in that year. Nor does it compare favourably to the National Crime Agency’s estimate of at least 6,000 offenders involved in the trafficking and exploitation of people in all forms of modern slavery in the UK.⁶¹

⁵⁹ Human Trafficking Foundation, *Child Criminal Exploitation and The Need for Consistency*, 2022

⁶⁰ Modern Slavery and Organised Immigration Crime Unit, *Non LEA Overview Of Live Modern Slavery Investigations (Msid) In UK Policing December 2022 (data to 07/01/2023)*.

⁶¹ National Crime Agency, *National Strategic Threat Assessment for 2023 for Serious and Organised Crime*, 2023



In 2020 HMIFRS said “we believe that modern slavery offences should be pursued whenever possible in county lines cases” but this does not yet seem to be the case. Ensuring prosecution for modern slavery offences rather than drugs offences allows access to the maximum life sentence and civil slavery and trafficking protection orders to govern an offenders’ behaviour after conviction. But more than that, it has been suggested that “Some perpetrators may be deterred by the stigma that can come with a modern slavery conviction, particularly involving children.”⁶² This potential deterrent effect as well as greater monitoring of offenders would also be enhanced by greater use of the civil orders under the Modern Slavery Act on conviction for modern slavery offences or where there is perceived to be a risk of exploitation. Slavery and Trafficking Prevention and Risk Orders (STPOs and STROs) are currently underused but have great potential for disrupting exploitation and prevent other victims being harmed.⁶³ Our recommendation for a national register of modern slavery offenders through mandatory imposition of STPOs with notification requirements on conviction for modern slavery offences as well as making STPOs and STROs available in a wider range of circumstances would aid this deterrent and monitoring of criminal exploitation offenders.

Recommendation 1 above to bring criminal exploitation explicitly into the Modern Slavery Act emphasises that this is the appropriate legal approach.

One reason for such a low prosecution rate is that many victims do not want to give a witness statement about their exploitation, yet we have heard from police officers that the CPS will often still reject a modern slavery charge if there is no victim statement. Staff at British Transport Police said that very few of their county lines victims give a statement or engage with prosecutions. Nonetheless, they proceed on an evidence-led basis and have been able to get modern slavery prosecutions. But, as described earlier, modern slavery investigations are complex and resource intensive and even more so to support a charge without victim testimony.

Justice and Care’s frontline Victim Navigator programme which embeds independent support workers in police forces to care for victims has demonstrated that with consistent wrap-around support adult victims of modern slavery, including criminal exploitation, can be given confidence to act as witnesses and engage with prosecutions.⁶⁴

Another challenge police officers told us that they face is in identifying the perpetrators of exploitation, as this type of criminality can often span across county (and police force) boundaries. There is a need to continue to improve collaboration across force areas to tackle this type of crime.

⁶² HMICFRS, *Both sides of the coin The police and National Crime Agency’s response to vulnerable people in ‘county lines’ drug offending*, 2020

⁶³ Centre for Social Justice and Justice and Care, *Slavery at Home*, 2023

⁶⁴ Justice and Care, *Victim Navigator Pilot Final Evaluation From Victim to Witness to Survivor*, 2022

6.2 Empowering victims to build a new life and prevent re-exploitation

As we have already outlined, for many victims, getting out of criminal exploitation is not straightforward. Fear of criminal gangs, normalisation of violence and the pull of the money that some victims do or hope to get from the criminal activity mean that helping victims first means helping them to choose a different path.

Interventions at ‘reachable moments’ such as when a person is injured and ends up in hospital or when they are arrested and in police custody, are an opportunity to start that engagement with people caught in criminal exploitation. This is true even if it is not completely clear that the person is a victim of exploitation.

“we’re doing a lot of work with the police at the moment to try and persuade them that you don’t need to think someone’s 100% a victim in order to refer them to us because you can see our service as rehabilitation, as well as about rescuing somebody who’s been horribly exploited and groomed.”

Staff at St Giles Trust

We heard about the Red Thread project in a hospital in Croydon, and similar work done by the St Giles Trust at hospitals in London and the Midlands and in police custody suites. These projects work with adults and young people coming into hospital or custody as a result of injuries relating to knife crime or gang activity or suspected of committing offences. The aim is to engage with people to divert them away from criminal activity, educating them about the risks of exploitation and provide them with support to help them move forward. Support may vary from connecting the person with youth work services or helping them to access education, training or employment. It also involves connecting them with services to help address underlying issues such as mental health or substance misuse and practical issues like housing or benefits.

Some of the lived experience consultants we spoke to highlighted how frightening and unpleasant the experience of police custody can be and how even solicitors are not always available to provide advice and support. One of these consultants, Alicia, recommended having an independent person always available in police custody suites to provide support and advocate for victims of criminal exploitation. Although providing such assistance around the clock in all custody suites would be resource intensive, engaging with specialist charities (see below from examples) and ensuring those providing independent services as ‘appropriate adults’ to children and vulnerable adults in custody are adequately trained in criminal exploitation would make a difference.

Referral to the NRM should also be a ‘reachable moment’ to enable interventions to prevent continued or re-exploitation. Yet, it is unclear to what extent referral to the NRM and the support provided, to both adults and children, prevents continued or re-exploitation in criminal activity.

Recommendation 8

The Home Office should conduct a review of the access that victims of criminal exploitation (both adults and children) within the NRM have to specialist crime diversion support to protect them from re-exploitation and continued criminal activity. This review should consider:

- how many adult victims and how many child victims are accessing specialist diversion/re-exploitation prevention support;
- the barriers to victims accessing specialist diversion support;
- what type of support is provided, by which organisations and in which locations;
- what specialist diversion support is provided to victims who raise the statutory defence under s45 of the Modern Slavery Act;
- the role and impact of the ICTG service in preventing re-exploitation and facilitating access to diversion services;
- the scope for including access to specialist diversion support within the new MSVCC.

Non-judgmental, trauma informed support

Many of the experts we spoke to told us that what victims of criminal exploitation need, whether adults or children, is support from someone who really understands what they have experienced. Many spoke about the importance of non-judgmental and trauma-informed support that takes account of the impact the exploitation and their circumstances have had on them.

“most importantly, they need to be able to have a person that they can turn to, a person that they trust, a person they can speak to. It doesn’t have to be a professional, it could be a peer, a teacher, healthcare professional, anybody, just the power of having one person that you know, you can go to, and that’s not going to, you know, judge you.”

Sabrina Hewitt, County Lines and Exploitation Specialist

Case Study - Action for Children

Jay* was referred to Action For Children’s Side Step service in February 2022, after a previous engagement with another service fizzled out. A few years previously, when he was in his late teens Jay had experienced at least two separate incidents where he went missing from home and was later located in “trap houses” and travelling to towns across the country far away from his home. Professionals at the time had concerns that he was being trafficked for the purposes of criminal exploitation.

Jay has a diagnosed Learning Disability and has recently undergone Mental Capacity Act assessments. These have found him to lack understanding around risk and exploitation. Jay has always tried to help others and was a regular helper/trainer for other young people who wished to learn martial arts so when this was stopped due to the covid lockdowns Jay turned to ‘helping’ others, namely his exploiters.

After he was referred to us Jay was allocated a dedicated case worker, who has fully supported him with a bespoke intervention plan designed to enable him to become more aware of his predicament in the hopes of leading him away from a life of crime. Jay has fully engaged with our services and demonstrated that he wants to leave behind his previous lifestyle.

Unfortunately, he has had to deal with a number of knockbacks and is now currently on remand in secure accommodation in relation to other offences related to violence committed in the company of other males who have previously trafficked Jay. Even whilst in custody on remand for these offences these same males previously arrested for trafficking Jay made contact with him via family members.

Jay is an extremely vulnerable young man who has displayed all the hallmarks of somebody being exploited, our work now is ensuring that we inform Jay of the efforts and the work people are doing to ensure that he gets a fair hearing.

*Name changed to protect his identity

One of the key challenges is that for many victims, especially young people, they can be in contact with several different professionals and different support services often being asked the same questions and not understanding the various processes that these professionals are taking them through. Having one single support worker, someone who can go through that whole process with the victim can be a valuable buffer against being re-traumatised by the processes meant to help them.

The charity Catch 22 provides a support and rescue service (funded by the Home Office) to provide one-to-one mentoring support to young people and their families including a rescue service to help return young people involved in county lines drug activity back to their home safely when identified away from their home police force area. The rescue service can operate ‘out-of-hours’ and is available 365 days a year in four areas across the country: London, the West Midlands, Merseyside and Greater Manchester.

In London, the Mayor's Office for Police and Crime funds the Rescue and Response Pan London County lines service delivered by St Giles Trust, Abandia, and Safer London to provide support to young people involved in county lines, upskill professionals and increase data collection and intelligence analysis.

Unlike for adults, children who enter the NRM are not supported by the MSVCC. A review by the Child Safeguarding Practice Review Panel in 2020 found that "Young people who are being criminally exploited are often referred to the NRM in the hope that it will give them protection. The review found that the NRM's original purpose does not always fit well with the circumstances of this group of children and that understanding and use of the NRM was patchy."⁶⁵

However, for children in some parts of England and all of Wales the Home Office funds the Independent Child Trafficking Guardian (ICTG) service operated by Barnardo's. Although the Government has at various times committed to a full national roll out of the scheme at present it is only available in East Midlands, West Midlands Combined Authorities, Bedfordshire, Gloucestershire (including Bristol), Warwickshire, all London Boroughs, Hampshire and the Isle of Wight, Kent, Surrey, Essex, Greater Manchester, North & West Yorkshire, Lancashire, Merseyside and all of Wales.⁶⁶ No data has been published on the scheme since 2021 so it is not known how many children and young people are currently receiving support from the service and how many of those have been victims of criminal exploitation.⁶⁷ However, our conversations with the ICTG team confirm that criminal exploitation is something experienced by young people within the service both British nationals and foreign nationals.

The scheme has two models of working with direct one-to-one support work being only for children without anyone with parental responsibility in the UK (i.e. unaccompanied migrant children). Aside from in a few pilot areas, British children and others with a parental figure in the UK do not receive direct support work. However, other professionals (such as social workers) working directly with them are assisted by an ICTG Regional Practice Manager who also works strategically with public authorities to improve the support and processes in place for safeguarding children who are victims of modern slavery. No evaluation of those pilots has yet been published nor any data on how many children with parents or guardians in the UK have received direct support under the pilots.

⁶⁵ The Child Safeguarding Practice Review Panel, *It was hard to escape - Safeguarding children at risk from criminal exploitation*, 2020

⁶⁶ Barnardo's, *Child Trafficking*

⁶⁷ Parliamentary Question for Written Answer HL 558, 7 December 2023



Recommendation 9

The Home Office should make the ICTG service a comprehensive national service by:

- completing the national roll out across the whole of England and Wales as soon as possible;
- publishing evaluations of the current pilots to extending direct support to children who have someone with parental responsibility and those beyond the age of 18 and announcing whether those models will be made available across the whole country;
- establishing with Barnardo's a pattern of publication of statistics related to children receiving support from the ICTG service.

Role of mentors and support workers with relevant lived experience

One of the strong themes among all those we spoke to was the added value that staff with relevant lived experience bring to work with teenagers and young adults who have been victims of criminal exploitation or are at risk. Whether providing educational sessions to larger groups or one-to-one mentoring or intensive support, this previous experience can give staff an acceptance and a shorthand that makes the young people they work with more receptive to the work.

Some staff have personal experience of criminal exploitation itself while others have relevant experience to the group they are working with, for example experience of being in prison or in the care system. Young people at risk or who have been exploited often find staff with relevant personal experience easier to relate to. Simple things like coming from the same locality or similar backgrounds, being immersed in the same culture or music can make these staff more approachable and also more credible to young people who might be suspicious of and predisposed to reject anyone who they feel cannot understand their situation.

"We rely heavily on that lived experience model, because from our perspective, it absolutely works. It's so powerful...You know, it's a step away, you never listen to your parents, you rarely listen to teachers. But if you've got someone who's walking alongside you, who genuinely gets it, who understands what it's like to be, you know, pressured into doing something that you don't want to do, who understands what it's like to be in a gang, and all those sorts of things."

Staff at St Giles Trust

Particularly for young people who are tempted by the appearance of a glamorous and wealthy lifestyle, or who see the violence and exploitation as normal, staff with lived experience are able to puncture those images and speak powerfully about the reality of the exploitation. They also provide an example that it is possible to live differently. In communities where young people see no other hope or path in life, staff with relevant personal experience offer young people a walking talking alternative, proof that something different is possible and available for them.

“You could be like ‘I’m here to help you, blah, you know, you’ve gone through this stuff, blah, blah,’ ... and it will literally just go through one ear, because I feel like that you’d not been in my situation, you don’t understand you never understand me ... Having [people with] lived experience in schools to deliver speeches, or just talk about their experience, that could actually motivate or encourage students who are actually going through that situation to come forward. That’s been the best way I’ve seen to draw out people from the situation.”

Nelson Omoragon, Lived Experience Consultant

Intensive work with individual young people is important, but many of the charities we spoke to also referred to taking a ‘whole family approach’. This can not only respond to the wider impact of the exploitation on parents and siblings but also family circumstances that create vulnerability to exploitation.

Harnessing skills and adrenaline

We heard from many of the experts we spoke to that a lot of young people who are victims of criminal exploitation have skills and drive that they are deploying in the course of the criminal activity or forced to develop because of the circumstances. Many of these young people have been travelling alone across the country, handling money, weighing and distributing drugs. Some of them have developed skills related to problem-solving, maths, science, and an entrepreneurial spirit. Rather than saying this experience needs to be left behind because it is linked to criminal behaviour, we need to develop ways to harness that energy and skills and show young people other contexts in which these skills will enable them to succeed.

“youngsters we work with are very motivated to succeed. This is the thing, they’re not thick, they’re not couch potatoes, if they were they’d be safe at home on the couch. They want to succeed, but they’ve bought the idea that they can’t succeed conventionally.”

Staff at St Giles Trust

We also heard that many victims, young people especially, have become accustomed to high levels of adrenaline from their experiences within organised crime gangs and prior to their exploitation.

“one of the other things that we do is offer opportunities to expand horizons and have new experiences. Getting some young people climbing up mountains, going kayaking, going paddleboarding, going to Alton Towers, because when you’ve been used to that amount of adrenaline hit, in high-risk situations, your life feels really boring, the minute it all stops.”

Staff at Pure Insight

Others spoke about the impact of trauma and PTSD that can sometimes leave victims experiencing episodes where their brains are overloaded.

“it would be great if [schools] had a little room, just a small little room, that had an Xbox, or a PlayStation or a Switch because, you know what I do whenever I feel like my adrenaline’s going whenever I have like a PTSD episode, or whenever I am, like so stressed and I cannot calm down. The first thing I do is I play [computer game] Fortnite because it’s so fast that my adrenaline’s going that actually calms me down.”

Emily, HTF Lived Experience Advisory Panel

Risks of online activity must of course be balanced with any potential benefits, but in general providing opportunities to engage safely in activities that can meet some of these needs for adrenaline or help to focus an overactive mind can provide a release and protect victims from returning to exploitation.

Practical support for adults

Some youth programmes will work with young adults up to the age of 25 but overall, there is much less specialist support available for adult victims of criminal exploitation. Adult victims should be able to access the NRM and support under the Home Office-funded Modern Slavery Victim Care Contract. However, British nationals (as many victims of criminal exploitation are) are often not referred to the NRM, and even if they are referred, they may be expected to apply to local authorities for housing rather than being accommodated in a specialist safehouse.⁶⁸ One of the challenges of temporary accommodation, especially if a victim is homeless when they are first identified by professionals, is that a person might need support to protect them from continued contact with their exploiters, or access to mental health services and other support.

The Modern Slavery Policy and Research Manager at The Passage homeless charity told us *“Westminster council has a very clear pathway for rough sleepers and a mental health pathway into hostels. You have to have a move on plan, you can’t just put a person in a hotel and leave it at that.”* Safehouse support in the NRM may not be the best option for some victims due to their complex needs. Our previous research has highlighted the challenges the MSVCC subcontractors have in meeting these complex needs and if victims have strong connections and are already known to local services it may be better for them to stay put, but the option should be there for people.⁶⁹

Case study - Partnership Enforcement Team, Rochdale Council

Helen* was a victim of cuckooing who entered the NRM and was accommodated in a safe house 80 miles away from her home. Unfortunately, the safehouse couldn’t cope with her complex needs. She ended up being banned from her safehouse accommodation. Because she had moved out of the area, she lost her original tenancy and ended up homeless back in Manchester. For her it would have been better to be cared for by us locally because we knew her and her situation.

*Name changed to protect her identity



⁶⁸ Centre for Social Justice and Justice and Care, *A Path to Freedom and Justice*, 2022; St Mary’s University, *Identifying Pathways to Support British Victims of Modern Slavery towards Safety and Recovery: A Scoping Study*, 2022

⁶⁹ Centre for Social Justice and Justice and Care, *A Path to Freedom and Justice*, 2022;

Catalyst is a mental health and drug and alcohol support charity in Surrey who run a specialist cuckooing support project funded by the Office of the Police and Crime Commissioner in Surrey and Surrey County Council Public Health England, and with additional funds from the voluntary sector they are able to go above and beyond providing basic furniture, bedding, clothes, assistance with changing locks on their property or new identity documents as well as assistance in getting medical attention for the victim.

“Our aim is to provide an intense but brief intervention to support the victims by reducing safeguarding risks and develop their resilience.”

Staff at Catalyst

Unfortunately, there are not many charities like Catalyst and if victims who do not enter the NRM many also do not meet the threshold for support from local authorities’ adult social care teams. In Newcastle we heard that the city council considers that adult victims of exploitation fall within the ‘adult at risk’ definition in the Care Act 2014. The adult safeguarding team in Newcastle coordinate an inquiry under section 42, bringing all relevant agencies together to assess the person’s needs and create a plan for support and care. However, this is a rare case. Most other local authorities interpret the Care Act responsibilities narrowly, limited to issues of physical or mental conditions or impairment. This may be due to a lack of understanding but also pressures on resources available for adult social care.

Recommendation 10

Local authorities should provide holistic support for adults who are at risk of or have become victims of criminal exploitation:

- The Department for Health and Social Care should issue guidance for local authorities on assessing and supporting adult victims of criminal exploitation as adults at risk under Care Act 2014;
- The Home Office should update the guidance ‘Criminal exploitation of children and vulnerable adults: county lines’ to add reference to responsibilities of adult social care under the Care Act;
- DLUHC should initiate pilots of complex needs navigators to provide outreach support to prevent vulnerable people falling into homelessness and exploitation building on existing initiatives taken by local authorities under the Rough Sleeping Initiative fund.

One particular consequence of the narrower access to adult social care is that some young adults fall through the gap when transitioning from children’s services. Not only are fewer support services available for young adults after they turn 18, but the processes for transferring someone from children’s services to adult social care are not smooth. The NRM has its own problem with children turning 18. Delays in NRM decision-making mean many young people referred to the NRM as children are still waiting for an NRM conclusive grounds decision after they turn 18. That means the support they can access outside the NRM is less than when they were younger.

The Regional MSHT MARAC coordinator for modern slavery MARACs in Wales told us that over the past two years they have introduced a process whereby young people who are in the NRM are referred to the MARAC one month before their 18th birthday so that there can be a handover of care and any risk management plan in place can be continued and new support implemented, not to duplicate the support or process from children’s services but to continue that support. The ICTG service is also currently piloting continuing support for young people up to the age of 21 or 25 according to the individual needs of each victim. This similarly helps to smooth the transition from children’s services to adult social care or other support services and ease the ‘cliff edge’ drop off in support.

“the actual decision for someone to be identified as a victim of criminal exploitation can take two to three years. So, if that happens when you’re 16...you’re then 18, and you therefore don’t meet the criteria of social care anymore.”

Alicia, HTF Lived Experience Advisory Panel

An additional problem is that because adults must consent to enter the NRM but children do not, we have been told that the Home Office’s SCA decision-making body is asking First Responders who referred the victim to the NRM to make contact with the victim who was referred as a child and ask them if they want to remain in the NRM process now that they are over 18. Practically speaking, many police First Responders will have had no ongoing contact with the victim. The case may have been passed onto another officer for investigation, or commonly for county lines cases, the police may have closed the case because the victim has not given evidence. It may not be easy for police to make contact with these victims. Similarly, the person may have exited support from local authority children’s services so those First Responders may no longer have ongoing contact with the young adults concerned. If victims cannot be reached, not only is their NRM decision suspended but it may leave them without support.

“Since early 2023, we have become aware of a number of suspended NRM cases. At present, this sits around 300 within the West Midlands. This is due to the SCA requesting that young adults are recontacted to ensure that they wish to remain in the NRM. This has proved difficult to progress consistently, and I suspect that many are UK nationals who were criminally exploited and referred to the NRM as children. Whilst there is some good practice in revisiting this cohort, there are still some obvious gaps, and a risk that the number will increase. As a partnership, we are working to understand the picture, and to devise a consistent response to ensure that individuals’ rights and entitlements are available to them.”

Staff at West Midlands Anti-Slavery Network

One of the biggest needs for adult victims of criminal exploitation is safe housing. A large number of adult victims have been victimised through ‘cuckooing’. They may not be safe continuing to live in the same property where they can be easily found and re-exploited.



Recommendation 11

The Home Office should set out in the Modern Slavery Act Statutory Guidance a clear, agreed process for obtaining consent from young people turning 18 while awaiting an NRM decision and transitioning them into MSVCC support or local authority or other support if they decline to enter the NRM. This process should begin at least three months before the young person's 18th birthday. The process should be developed in consultation with First Responders, the MSVCC contractor and subcontractors, the ICTG service and local authority social services.

Whole families may need to move if they continue to be at risk after the exploitation of a teenager. Some victims will not want to move, and it may be best for them to remain within the community where they have support networks and wider families. For others they may need to move out at least temporarily for their own safety or peace of mind

The problem many victims, and those supporting them, encounter is that it is not easy to find alternative accommodation. For victims in social housing victims of modern slavery have no exemption from the need for a 'local connection' to an area to qualify for social housing. Victims of domestic abuse are exempt from this requirement under guidance, and the government has even consulted on the possibility of enshrining this in secondary legislation,⁷⁰ and we have previously recommended that modern slavery victims should have the same exemption as they too may need to relocate for their own safety.⁷¹ Professionals we spoke to talked about pursuing access to accommodation for someone on the grounds of domestic abuse rather than modern slavery when the victim had experienced both as that provided more options.

"we're currently working with a complex case at the moment where the person was cuckooed... but is currently street homeless because the local authority won't accept responsibility. The local social worker working with the individual felt it wasn't safe for them to remain in the local area, because they were being cuckooed by an OCG. So, they felt it wasn't safe for them to remain in the local area. So, he went to a neighbouring area to present as homeless, and they will not accept responsibility. So, the past five weeks he has been sleeping in a tent. So, we're trying to challenge those decisions and get the local authority to accept the responsibility [to house the victim]."

Welsh Regional MSHT MARAC coordinator

⁷⁰ Department for Levelling Up, Housing and Communities, *Consultation on local connection requirements for social housing for victims of domestic abuse*, 2022

⁷¹ Centre for Social Justice and Justice and Care, *A Path to Freedom and Justice*, 2022; St Mary's University, *Identifying Pathways to Support British Victims of Modern Slavery towards Safety and Recovery: A Scoping Study*, 2022



The response from local authorities seems to be inconsistent with some fully recognising victims of criminal exploitation's need to move, waiving the local connection and providing support and assistance, whilst others decline to admit responsibility. Another bureaucratic barrier for victims accessing accommodation is that if they have left their tenancy, pushed out by fear and the threatening behaviour of those exploiting them, they may be considered to have made themselves 'voluntarily' homeless and therefore ineligible for housing support from the local authority. Housing benefit rules are also a barrier to finding alternative accommodation for victims who may not be ready to move away completely. Benefit rules to prevent fraud mean that you cannot receive benefits for two properties at the same time, but if a cuckooing victim needs temporary accommodation, that puts them in a difficult position. We were told that the rules have been changed recently allowing benefits to pay for a second temporary accommodation if there is a clear intention to return to the original tenancy, but sometimes victims struggle to get confirmation from their housing provider that they will be allowed to return to their original tenancy.

"We had one victim who we moved into a local male temporary accommodation hostel before we were able to arrange a managed move for him with his existing housing provider. It cost the council £3,000 for him to be in that temporary accommodation because he wasn't able to claim Housing Benefit for temporary accommodation."

Housing Lead, Partnership Enforcement Team, Rochdale Council

The multi-agency Partnership Enforcement Team at Rochdale Council told us about their provision of respite housing for criminal exploitation victims who need time away. They explained how they had been able to get some Home Office funding for the initial project and the Council has continued to fund it, allowing them to house victims without benefit payments or risking ending their original tenancy. Alongside accommodation, floating support workers also work with the victim to help them move forward after their exploitation.

Lack of availability of suitable housing is also a major barrier in safeguarding victims of cuckooing. Many victims have to join a waiting list to move to different accommodation, often alongside other equally vulnerable and high priority residents who need to move, such as domestic abuse victims.

Many victims are at risk of being exploited again even after they have received some help. All the support they receive needs to consider that risk and enable victims to protect themselves. For some victims this might be the provision of a helpline or support service that they can reach out to when they are ready. Unseen's Modern Slavery and Exploitation Helpline is one such service,⁷² as is SafeCall — a confidential helpline run by Missing People for young people who are missing or affected by county lines exploitation and their families.⁷³ Sometimes that will be down to making sure they can access support to address their vulnerabilities or move them to a place where they will be less likely to be traced by the gangs who exploited them. But it also requires helping them to gain knowledge and life skills that can help them to identify risks and make decisions about how to protect themselves and build a better future.

⁷² modernslaveryhelpline.org

⁷³ <https://www.missingpeople.org.uk/get-help/help-services/exploitation-and-county-lines>



“we’ve seen some really good examples of young people who, because we teach them a new language, have come back to us and said, ‘I’ve got a couple of red flags, I think about this person,’ and they tell us what they are. And it’s brilliant because you know that everything that you’ve coached and spoken to them about has sunk in, they’re learning from it about how to put boundaries in. It might not even just be with, you know, criminal gangs, it might be around their own family, or, you know, all the relationships that they’ve got that feeling harmful or exploitative to them.”

Staff at Pure Insight

“these are some of the smartest kids you’re ever going to meet. And they should be. If they know what’s going on, they should be able to feed into that journey and say, ‘Look, this is what I need,’ instead of you telling them what they need, that let them tell you what they need”

Emily, HTF Lived Experience Advisory Panel

Recommendation 12

All victims of modern slavery who are eligible for social housing should be exempt from local connection conditions and have priority access to social housing. This should include victims of criminal exploitation and cuckooing and should not necessarily depend on them consenting to a referral to the NRM:

- DLUHC should amend the guidance to local authorities on providing accommodation to victims of modern slavery so that it provides the same strong direction for exemption from the local connection requirement as in guidance related to victims of domestic abuse.
- Amend the Housing Act 1996 so that victims of modern slavery are exempt from local connection conditions and have priority access.

Long term investment vs short term interventions

One challenge that many charities highlighted was that although there have been injections of funding for specialist services to address criminal exploitation and other support that victims might benefit from, much of this is only short term, maybe as short as one year. Short term funding means some services will wind down after the funding ends if additional finances



cannot be found. Retaining staff is very difficult if there is no funding guaranteed beyond a year and relationships between charities and their clients are broken if services have to stop due to funding.

“Short term funding also means that we lose trust of our clients because services are short term and we can no longer provide them.”

CEO, Diversity Matters North West

Funders also often require performance reporting based on the number of individuals the project works with. This can lead to a focus on short term interventions with a fast turnover to allow more people to be brought into the service—but this leaves open the question about who will pick up the work with that person afterwards. Many of the vulnerabilities that make someone vulnerable to criminal exploitation and the impact of the exploitation cannot be resolved with only a short-term intervention.

“In an ideal world, we would focus on intensity of intervention instead of quantity. We know that an intensive approach with a child, young person or family could make the greater impact, if allowed the time to build that connection with daily visits. The higher the target outcomes the more diluted the work becomes, only a certain amount of impact can be made with a weekly session.”

Senior Service Manager County Lines Support & Rescue Service, Catch 22

But positive engagement need not only come from charities or commissioned services. One of the lived experience consultants spoke about the potential for community interest companies to play a part in providing mentoring and role models for young people.

Recommendation 13

Funders of community groups and charities should prioritise sustained funding for providing youth work, activities and support to young people and vulnerable adults at risk of or who have experienced criminal exploitation. Including:

- Adjusting funding models so more multi-year funding is available. The Home Office specifically should ensure multi-year funding to Violence Reduction Units (VRUs), and VRUs should likewise provide multi-year funding to the projects they support.
- Modifying Key Performance Indicators required as part of grant funding with attention to depth and effectiveness of work in preventing criminal exploitation, not simply high numbers of individuals provided with short term interventions.
- The Government should establish a Youth Infrastructure Endowment which harnesses the power of match funding to turbocharge an expanded government grant funding pot from which to embark on an ambitious programme of building new youth clubs and services. (CSJ, *Game Changer*, 2023)

6.3 Strengthening community and partnership responses

Criminal exploitation happens in communities—and communities are part of the solution.

Lots of people within communities will encounter possible victims and not just the police or local authorities. Tradespeople, meter-checkers, railway staff, supermarket staff all may see signs of exploitation when visiting people in their homes, on the transport network or about their regular routine. With the right training and good connections with local services to know how to report their concerns these people could help to alert the authorities to exploitation.

Registered providers of social housing have a raft of information about their clients and may be the first to spot the signs of exploitation if they know what to look for. One housing association told us how collaborative working with a charity working with cuckooing victims and with the police enabled them to identify and support victims previously unknown to the authorities.

“As part of a police intensification week we identified 40 properties using a list of cuckooing indicators from [a local charity providing a cuckooing support service]. All 40 properties were visited by the police and three addresses were found to be being actively cuckooed. None of these properties had come to our attention as a possible risk through other means. Two of those tenants turned out to be victims in high-risk situations and we moved them straight away.”

Staff at a Housing Association

The collaborative approach to cuckooing that we saw in Surrey is a good example of how partnership working between statutory agencies and with local charities and other organisations can enhance both identification of victims and the response. Charities and other non-governmental organisations can pick up on information that statutory agencies might not because they are embedded in communities and often people can be more willing to disclose to community groups than to official agencies. The Children Young People and Families Consortium in Yorkshire told us how they act as a conduit for the flow of information about concerns, priorities and strategies in both directions between statutory services and local NGOs. However, there can be barriers to information-sharing for statutory agencies, especially sensitive information about individuals or organised crime groups.

A small community-based charity in Yorkshire told us that statutory agencies need to work with communities to develop plans together for how to improve situations in their community not just ‘do things to’ communities and that local community organisations can be a bridge to hard to reach groups. The charity spoke about a growing fear or lack of trust of national third sector and mainstream services, on the part of hard to reach groups who are concerned, for example, about what these services will do with the information they provide. In many cases there are individuals and groups in communities who can provide support, connection, advice and help to vulnerable people at risk of exploitation and those who are being victimised.



“the people within that community better understand that child than anybody. So if you can find mentors, it might not be a family member most likely wouldn’t be a family member, that person can turn to when times are hard, or they’re struggling or they’re feeling challenged, or they feel at risk that they can call and they can sit down, grab a cup of tea with whatever it is they want. You know, I think you are kind of shoring up tell it, you’re saying to that young person, that you matter to your community”

Alan, HTF Lived Experience Advisory Panel

Often these are smaller local groups embedded in their local area. When it comes to intergenerational poverty or exploitation it is often these groups who know and understand the family story who can come alongside them and show them the possibilities for a different future.

“We often become that healthy family for them when we show them what it can be and how to turn their lives around.”

Staff at The Oasis Centre Gorton

Formal multi-agency case management approaches for modern slavery such as the well-established MARAC system in Wales and the MACC approach in Westminster in London have many advantages for identifying and supporting victims of criminal exploitation—especially for those who may not wish to go into the NRM or who have a variety of complex needs. These forums offer a way to coordinate multiple agencies who are (or need to be) working to support an individual.

“The MARAC process works well as it links in with all the agencies working with that individual, and look at who’s doing what, when or where, so that roles aren’t being duplicated. And the major thing is about that risk management of that individual, just making sure we’re doing everything we can, we’re making sure that the markers and things like that are in place, especially the PNC [Police National Computer] from the police perspective, so if an individual was to move out of area, or go on to be caught by the police, at least then the police would have information on the individual being a victim, and then act accordingly.”

Regional MSHT MARAC coordinator

Recommendation 14

DLUHC should work with the Regulator of Social Housing and the new Ombudsman for the private rental sector (resulting from the Renters (Reform) Bill) to issue guidance for all landlords (social and private) and housing associations on the risk factors, indicators and best policy and practice for responding to cuckooing.



Recommendation 15

Every local authority should establish multi-agency case conference processes (like MARAC, or MASH) to respond to every potential victim of criminal exploitation (and all other forms of modern slavery) at identification and to monitor and ensure support for victims' care needs before and during the NRM if they are referred and outside the NRM if not (see CSJ and Justice and Care, *A Path to Freedom and Justice*, 2022).

- Multi-agency case conferences should involve MSVCC subcontractors.
- Social housing providers should also be included in case conferences and able to refer tenants they are concerned may be victims of modern slavery and exploitation.

Neighbourhood policing and criminal enforcement

Criminal exploitation is happening in the heart of communities and many people we spoke to felt that increased engagement and presence by police within communities would help to break down the sense of 'them and us' that some communities feel with the police. A key part of this is increased police presence in communities. One approach known as 'hotspot policing' where there are increased visible foot patrols by uniformed officers, active monitoring of CCTV and targeting of known repeat offenders in high crime areas has been shown to reduce violent crime. An assessment of research by the Youth Endowment Fund concluded that areas with hotspot policing saw an overall reduction in crime of 17 per cent, a reduction in violent crime by 14 per cent and in drugs offences by 30 per cent.⁷⁴ Evaluation of a trial of this approach in Southend-on-Sea found that the number of community violence crimes was 73 per cent lower on days with extra police patrols than days without.⁷⁵ The Government's Anti-Social Behaviour Plan published in March 2023 announced £60m funding for hotspot policing across the whole of England and Wales from 2024 building on existing pilots.⁷⁶ The Labour party has pledged to increase police patrols with 13,000 more neighbourhood police and PCSOs on the streets and a named officer for every community.⁷⁷

The central feature of neighbourhood policing that those we spoke to emphasised most however was about more than just presence. It is about relationships, a type of policing where police officers become known and familiar faces in the community that offers the most benefits to preventing and responding to this type of exploitation.

⁷⁴ Hannah Gaffney, Darrick Jolliffe and Howard White, *Hot Spot Policing, Toolkit Technical Report*, Youth Endowment Fund, 2022

⁷⁵ Lewis Basford, Chris Sims, Iain Agar et al. *Effects of One-a-Day Foot Patrols on Hot Spots of Serious Violence and Crime Harm: a Randomised Crossover Trial*. *Camb J Evid Based Polic* 5, 119-133, 2021.

⁷⁶ Department for Levelling Up, Housing and Communities and Home Office, *Anti-Social Behaviour Action Plan*, 2023

⁷⁷ Labour.org.uk, *Starmar launches community policing guarantee to get "more police in your town, fighting antisocial behaviour, taking back our streets"*, 2023

"we need more positive integration with the police force, you know, because a way that I was kept, you know, isolated was the fact that they villainized the police to me. they are actually meant to be, you know, people protecting our community. I didn't see them as that. I was kind of brainwashed to seeing them as, you know, part of the problem?"

Nelson Omoragon, Lived Experience Consultant

It can give communities confidence to see the police acting to address serious and organised crime in their community, and having a neighbour police officer can give them a direct route to report any concerns. For children or vulnerable people who might be at risk or already drawn into criminal exploitation or low-level crime if they have been able to build a relationship with a local police officer where they see them as someone they can trust it increases the likelihood likely they will go to them for help. But this level of trust cannot be gained instantly, it takes time and presence to build those relationships. People we spoke to told us about initiatives in the past where neighbourhood officers would hold 'coffee and chat' drop-in sessions as a way to build connection with the local community. A police officer in Yorkshire involved in a pilot of a policing tactic for addressing serious and organised crime called 'Clear, Hold, Build' which has a strong element of community engagement spoke about putting in time to be present in the community, getting to know community leaders, joining fitness classes with young women in the community to establish those relationships.

"it's old fashioned bobbying. ...I know everyone thinks 'Clear, Hold, Build' is special, and it is, we've done some good work, but really it's just good, old fashioned bobbying, being out on the street, talking to people, having the trust of the community and having a face that they can talk to and trust. It must be consistent. I've been in the area for 5 years. You need to gain the trust and prove your worth."

Police Officer, West Yorkshire Police

Relationships between neighbourhood police and community groups provide a way to connect young people who may have been exploited with local youth clubs and activities where they can receive support and diverted away from the criminal activity without a label of 'county lines' or 'exploitation'.

"But we have gotten relationships with them that we can go and say to them, Joe Bloggs had just been arrested for drug dealing, but actually we think he'd been groomed. And would you take him under your wing? And can he come to your youth groups? And so that's kind of how we work with the community groups with exploitation."

Police Officer, West Yorkshire Police

Strong enforcement against offenders can also help prevent people being drawn into exploitation is. It was suggested to us by a range of people from former police officers to people with lived experience of homelessness and exploitation that a lack of consequences for those committing crime, and more specifically for criminals exploiting others, can perpetuate the offending. If there

do not appear to be consequences for crime, many young people may not see a risk of getting involved in criminal activity (which can then lead into exploitation), and communities may not feel safe to report crime or exploitation if they see no police action, which enables criminal exploitation to continue unchecked, with more and more victims drawn in.

“It is a big barrier when there is a lack of enforcement against offenders and victims see a lack of positive action. There is no ‘success story’ for them to see. All they see are offenders still going round their community in a nice car.”

Colin Ward, Modern Slavery Consultant and Trainer

Recommendation 16

The Home Office and Chief Constables should prioritise and resource increased neighbourhood policing. Including:

- Increased police numbers to provide neighbourhood police in every local community building on hotspot policing initiatives as set out in the Anti-Social Behaviour Action Plan.
- Guidance and KPIs for police forces on building relationships with local residents and community groups so that policing is done ‘with’ not ‘to’ the community building on the experience and guidance on the ‘Clear, Hold, Build’ tactic.

6.4 Reducing vulnerability and preventing exploitation

Understanding the problem

In order to understand the risk factors relevant to the victims of criminal exploitation and adopt effective strategies to reduce the vulnerabilities, we need more systematic data collection and analysis of the characteristics and circumstances of victims both locally and nationally. This includes information such as how many children are ‘looked after’, how many are regularly missing from home or excluded or absent from school; for adults understanding how many have experienced homelessness or mental health issues or substance misuse. Our research has identified that many local authorities do not have systemic ways of recording and analysing information about the victims of criminal exploitation they are identifying, although some are involved in local mapping exercises about specific areas of concern. Those with most information were local authorities participating in a pilot scheme for devolving NRM decision-making for children to local multi-agency teams. Some local authorities we spoke to told us that they recognised this problem and were working to develop better systems to extract and analyse this information from their databases.

Recommendation 17

The Home Office, Department of Education and DLUHC should work with local authorities and police to increase data collection and analysis to identify rates of criminal exploitation and risk factors at local and national level. For every person (adult or child) identified as a possible victim of criminal exploitation (ideally all forms of modern slavery) whether or not they are referred to the NRM the following data should be collected and anonymously analysed:

- child protection/looked after status,
- schooling and absence,
- neurodiversity, mental health issues and other social care needs of the victim (and their parents/guardians if under 18),
- substance misuse issues (and their parents/guardians if under 18),
- housing and homelessness status.

Early intervention - families and children in care

Some vulnerability cannot be prevented but early intervention can stop people falling into exploitation. This early intervention has to start with support for families and reducing family breakdown. Nelson Omoragon, one of the lived experience consultants we spoke to about how to prevent criminal exploitation told us that the single thing that would make the most difference in preventing people being drawn into criminal exploitation would be “having a stable family”. This chimes with CSJ research around the engagement of fathers with their children in particular, which shows that high paternal engagement leads to children doing better in school, reduced risk of suspension or exclusion, higher self-esteem and less likelihood of children getting into trouble. It also shows that the engaging fathers early on in their child’s life is linked to later engagement.⁷⁸

Where there are challenging family situations such as domestic abuse, parental addiction, mental health issues or other crises, the risk of exploitation also needs to be considered and addressed by social workers, schools or other agencies in contact with the child (or vulnerable adult).

“I think [services need to be] engaging with people that are at risk. So before they get exploited, like if social care or police identify that this person has got other things where they’re going to be out the home, and because they might have issues within the home and start recognising them as potential people that could be at risk and undertaking that piece of work with them.”

Alicia, HTF Lived Experience Advisory Panel

⁷⁸ Centre for Social Justice, *Testing times: supporting fathers during the perinatal period and early parenthood*, 2018



Case study - Edge NE

A young man aged 15 was referred to us by his social worker due to concerns about him having vapes and cannabis despite the fact that he isn't given any money by his carers. One of our team met the young person at his school with his social worker. When we arrived to meet him his head of year said there was an issue that morning as the young man had said he didn't want to go home that night. It transpired that the young person lives with family friends who he calls Grandma and Aunties as he was removed from his mother's care at a young age. The young man was saying that he didn't want to stay in that home any longer and would rather go into foster care like his older brother or stay anywhere else. Our support worker was able to listen to his very legitimate concerns about not feeling safe at home and to support him with feeling bad that his Aunty has told him she doesn't want him there. We were also able to talk with him about his relationship with his brother and that him and his brother make money by selling vapes, sweets and drinks at both of their schools.

Recently he has been very worried about his brother who has been missing from his foster placement, being threatened by other young people and using a lot of cannabis. The young man has recently been expressing a desire to not be involved with selling vapes etc and said that he has stopped using cannabis.

Things have calmed down at home and we are meeting him weekly in school to keep him engaged with support and to keep a close eye on his involvement with criminal activity as we believe he is on the edges of criminal exploitation. However, he is doing a good job of keeping himself away from that at the moment and keeping engaged in school although this is very difficult for him due to the complex trauma he has experienced in his life.

Parents and other primary caregivers, like grandparents, also need specialist education and support about criminal exploitation to help them to address potential risks and recognise signs that their children may be pulled into criminal exploitation.

"With regard to preventative work, we should be getting into schools, we should be educating parents, I think... a lot of parents are absolutely oblivious to what happens. And you know, a lot of the time parents say ... we think these types of things happen to other children, not to our children."

Sabrina Hewitt, County Lines and Exploitation Specialist

Many parents can be fearful of involving social service worried that if they seek help their children may be taken into care so this education needs to be done with sensitivity but in a way that will encourage parents to seek help.

"We need to get parents to recognise that the advice is not an adverse criticism. Parents might be embarrassed, or they don't know different because this is how they were raised. Some parents might be worried that this could be a starting point for their children to be taken into care."

Member of The Passage Experts By Experience Panel

Early intervention and changes to structural processes could reduce the risks to young people in care and leaving care. A report by Ofsted into young people's experience of leaving care reported that *"fewer than half (45%) of care leavers said that someone had talked to them about their safety before leaving care. For those who did have discussions about safety, the most common topics were emotional well-being and mental health, and healthy relationships."*⁷⁹ Currently the statutory guidance on transition to adulthood for care leavers makes only a passing reference to the 'potential dangers of sexual and other forms of exploitation in respect of care leavers' saying social workers and advisers should be 'mindful' of these risks with no detailed guidance.⁸⁰

Of utmost importance is ensuring accommodation placements are safe and the risks of exploitation are mitigated for young people whilst in care. Likewise, when placing care leavers in independent accommodation thought needs to be given to how to maintain connection with support networks and services that can be a protective factor. This includes considering the location of the property. We heard from one local authority about the possibility of using mechanisms like the 'sensitive letting' policy to avoid placing a vulnerable person (whether a care leaver or other vulnerable person) in a property in a location known to pose risk of criminal exploitation (such as where cuckooing or other criminal exploitation has been identified previously or there is known drug dealing in the area). Sensitive letting policies are usually used to prevent further nuisance or disruption the local community posed by a potential tenant but also can prevent a vulnerable person being placed into a location with a history of anti-social behaviour where they could be at greater risk of exploitation.⁸¹

"There needs to be consistent consideration around the housing offer to care leavers and make sure that as the most vulnerable group of young people, they are given priority for better housing options. Housing situations aren't just about 'oh, we got offered a flat quickly'. It's about the thought that goes into the area that they're going to be in, what support they're going to have when they get there, you know, it's not good enough to provide a set of keys to a young person and a bit of money to set up home. It's thinking about, what is this transition going to be like? What does that support network look like for them? How can we make it that they have the best possible starts to get linked into the local community?"

Staff at Pure Insight

⁷⁹ Ofsted, 'Ready or not': care leavers' views of preparing to leave care, 2022

⁸⁰ Department for Education, *The Children Act 1989 guidance and regulations Volume 3: planning transition to adulthood for care leavers*, updated February 2022

⁸¹ For example, *Enfield Allocations Scheme approved 30.09.20 - amended 21.07.21*

Recommendation 18

The Department for Education should update the statutory guidance ‘The Children Act 1989 guidance and regulations Volume 3: planning transition to adulthood for care leavers’ to include a specific section on considering the risks of exploitation for care leavers and requiring consideration of the type of accommodation, location of that accommodation and the need to enable continuation of protective factors in a young person’s life such as proximity to new and existing services and support networks.

Schools and youth work

Schools have a vital role to play in diverting young people from criminal exploitation by providing a forum to educate them about the risks and realities of criminal involvement. The St Giles Trust told us about their SOS programme delivered by staff with lived experience who deliver sessions in schools to de-glamourise criminal activity and educate young people about the stark realities and the risks of exploitation. We also heard about similar education programmes run by other charities and local authorities. Unfortunately, we heard that not all schools are open to these sorts of programmes. Not only do they require funding, but some schools either genuinely think they do not have a problem with exploitation among their students or they are concerned that holding such a session would damage the school’s reputation by implying their students are at risk.

“I would see educating the child around their vulnerabilities, much more important than educating the child around their ABCs. Because the reality is, unless you’re safe, there’s no real point in learning, because that learning is never going to embed and sit with you. That kid needs to be safe, less vulnerable, secure.”

Alan, HTF Lived Experience Advisory Panel

Several people we spoke to highlighted the need for this intervention work to begin at a young age in primary school before it is ‘too late’ and the child is embedded in the culture around criminality and exploitation. We also heard that the point of transition from primary to secondary school is a particularly vulnerable one and a key moment for this sort of intervention.

Reducing the opportunities for exploitation provided by school exclusion is another important preventative tool. Many people expressed to us a concern that schools are too quick to exclude young people and that more effort is needed to keep young people in school.

“It is very easy to remove children from school. Many only want high performing children. There is always a reason why children are misbehaving or not learning, including SEN [special educational needs]. It seems like teachers cannot be bothered to deal with certain issues at school.”

Staff at a small charity in the East Midlands

“school is a safety net for a lot of these young people. Because once they’re at school, they can’t be out being exploited. So, you know, school needs to understand and realise that for some young people school is the only safe place for them.”

Sabrina Hewitt, County Lines and Exploitation Specialist

Strategies focussed on inclusion and engaging young people are key. This needs to include a broader approach to learning recognising that not all children learn in the same way or fit into the same model. And it must offer meaningful hope and aspiration to counter the narrative of criminal gangs that there is nothing else out there for these young people to aspire to other than drug dealing.

The benefits of positive activities for young people out of school hours were recommended by many charities we spoke to and the loss or lack of youth clubs and other activities in local communities was raised as a significant issue. Charities pointed to some specific programmes such as Onside Youth and Premier League Kicks in particular (echoing other recent CSJ research findings on the benefits of sport including diverting young people from criminal activity).⁸² Charities also highlighted the need for a broader range of activities like dance, arts activities, computer coding and similar — not all young people are interested in playing football!

Recommendation 19

The Department for Education should bring forward regulations under section 35 of the Children and Social Work Act 2017 to require that criminal exploitation is included in personal social, health and economic education. Guidance should also outline the benefit of commissioning specialist independent charities to provide that education and note the additional benefits of involving staff with relevant personal experience in delivering such sessions.

Recommendation 20

Schools and the Department for Education should take steps to develop and strengthen the approach to inclusion by

- adding inclusion as a fifth key judgement in Ofsted inspections;
- introducing a national inclusion framework for schools and academy trusts.

CSJ report *Suspending Reality, 2024* lays out a full set of recommendations to address inclusion and the specific risks of criminal exploitation for young people who are excluded from school should be included as a key consideration in these measures.

⁸² Centre for Social Justice, *Game Changer: A plan to transform young lives through sport*, 2023

Support for adults with complex needs

When it comes to adults, the risk of exploitation can be reduced through better identification and support for people with complex needs that can make them vulnerable. For example, support for people with mental health issues or substance misuse or homelessness —especially those with multiple needs. Charities told us how often statutory services cannot or do not talk to each other even though a person may be receiving or in need of support from multiple agencies. We heard how in some cases having these multiple needs became a barrier to support (which can in turn leave someone vulnerable to exploitation). For example, we were told that many people have both mental health needs and substance misuse issues, but mental health services will often not see someone while they are still misusing drugs. During 2022-2023, 71 per cent (97,685) of adults entering substance misuse treatment said they had a mental health treatment need (a rising trend from 53% in 2018/19). 20 per cent had no home of their own and over one in 12 (11,564) said they were at risk of homelessness within eight weeks.⁸³

In Greater Manchester we heard about a group of 30 ‘complex needs navigators’ to provide support and advice to adults with multiple disadvantages. These staff are employed by local charities through national funding channelled through the local authority. Not only do they help individuals to navigate services but their location within local authorities and as part of a wider network helps to increase understanding and facilitate collaborative working. As well as supporting people with their specific needs it works to reduce their vulnerability to criminal exploitation.

“the more support someone has got, the less attractive the offer of criminal exploitation is.”

Complex Needs Navigator at The Bond Board

Social media and online safety regulation

The new Online Safety Act 2023 requires social media providers and other platforms to protect all users from illegal content and activity online. It also requires steps to protect children from other internet-based content and activity deemed to be harmful. We hope that these rules and the accompanying guidance and regulation by Ofcom will reduce the ability of gangs to use this technology to recruit, groom, control and direct the adults and young people they are exploiting for criminal purposes.⁸⁴ However, many of the experts at the sharp end of working with people at risk and seeking to disrupt the gangs’ activities had little hope that much could be done that would be effective in preventing the use of social media in this way.

“you’re never going to stop social media. And social media and its character is one thing, bring in AI and that’s another. Wind the clock forward 10 to 15 years, and we can’t even begin to dream or imagine how that might impact vulnerable young people or adults.... I don’t know to what extent at the moment gangs.... are starting to think about AI, but it’s not going to take long, you know, and they’ll be all over it. So my view is, we absolutely need to get in much, much earlier, educate children and young people, and show them the alternatives and give them the opportunities.”

Staff at St Giles Trust

⁸³ Office for Health Improvement and Disparities, *Substance misuse treatment for adults: statistics 2022 to 2023*, 2023

⁸⁴ Ofcom, *Online safety rules*, 2023

Some of the charities suggested that social media companies could use the technology proactively to target and promote awareness-raising adverts educating young people about the risks of exploitation. However, others shared scepticism about the interest of social media companies in this sort of work.

Root causes

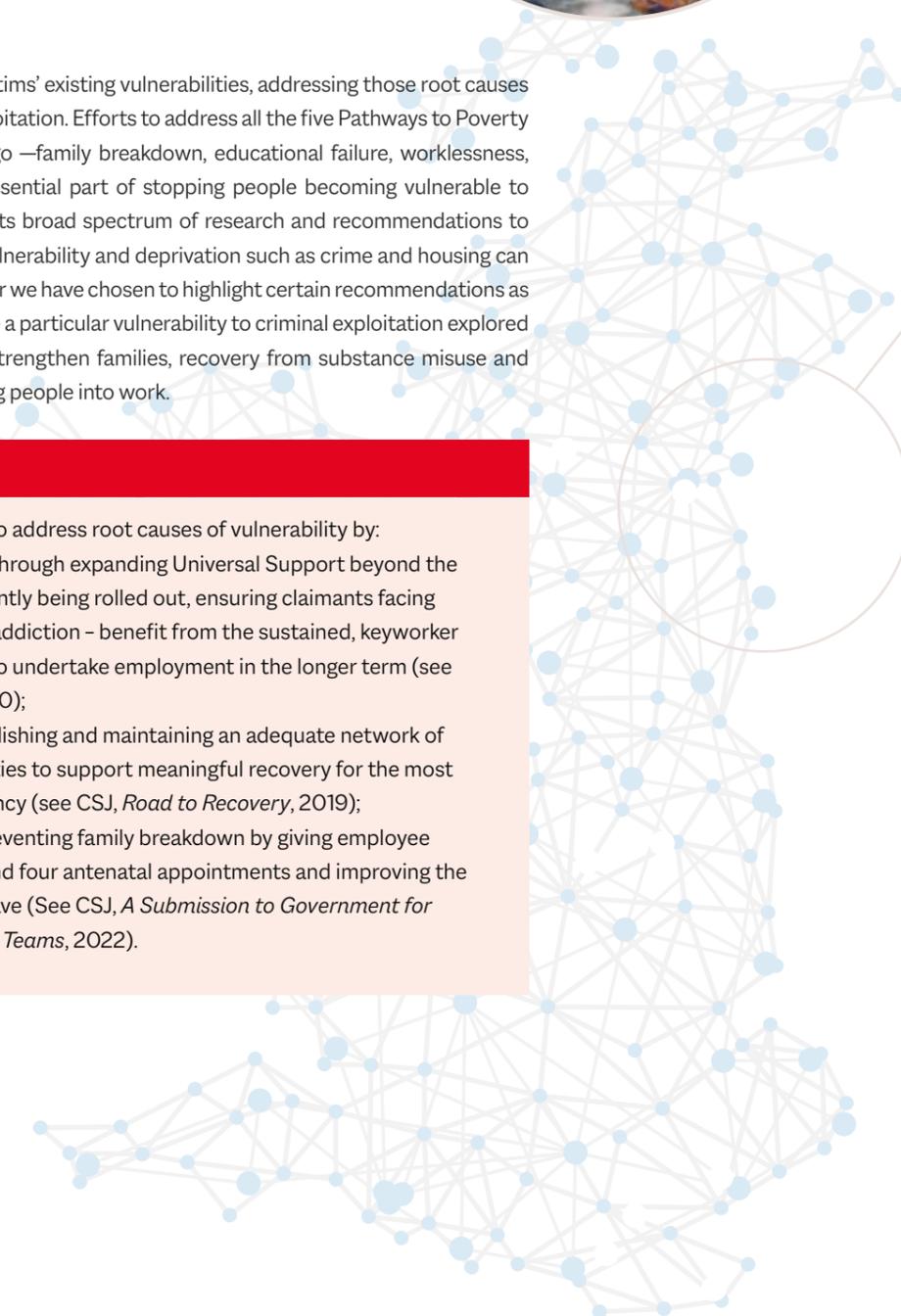
Since criminal gangs take advantage of victims’ existing vulnerabilities, addressing those root causes is fundamental to preventing criminal exploitation. Efforts to address all the five Pathways to Poverty identified by the CSJ almost 20 years ago —family breakdown, educational failure, worklessness, addiction, and problem debt — are an essential part of stopping people becoming vulnerable to criminal exploitation. The CSJ continues its broad spectrum of research and recommendations to address these and other root causes of vulnerability and deprivation such as crime and housing can be found on the CSJ website.⁸⁵ In this paper we have chosen to highlight certain recommendations as a first step to addressing issues that create a particular vulnerability to criminal exploitation explored above focusing on early intervention to strengthen families, recovery from substance misuse and addressing deprivation through supporting people into work.

Recommendation 21

The Government should take steps to address root causes of vulnerability by:

- Supporting people into work through expanding Universal Support beyond the placement-based model currently being rolled out, ensuring claimants facing complex challenges – such as addiction – benefit from the sustained, keyworker support that will equip them to undertake employment in the longer term (see CSJ, *Unfinished Business*, 2020);
- Tackling addiction by re-establishing and maintaining an adequate network of residential rehabilitation facilities to support meaningful recovery for the most vulnerable as a matter of urgency (see CSJ, *Road to Recovery*, 2019);
- Strengthening families and preventing family breakdown by giving employee fathers statutory time to attend four antenatal appointments and improving the terms of statutory parental leave (See CSJ, *A Submission to Government for Implementing the Family Help Teams*, 2022).

⁸⁵ centreforsocialjustice.org.uk





7. Conclusion and recommendations

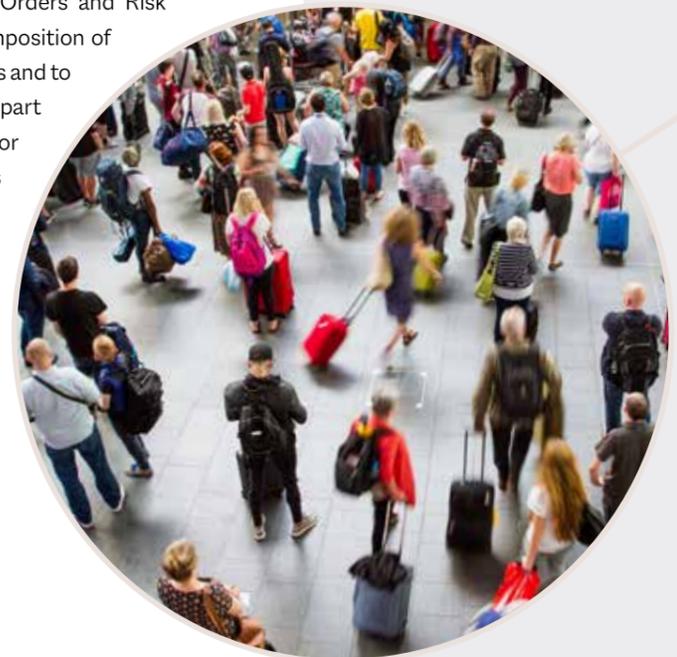
Criminal exploitation is a growing problem disproportionately impacting our most deprived communities and devastating the lives thousands of young and vulnerable people. As the primary type of modern slavery reported over the past four years, we need to act now to disrupt the activities of organised crime groups and to break the cycle of exploitation to rid our communities of this destructive force. It cannot only be considered as an issue affecting children, nor one that occurs solely a feature of county lines. It should be addressed as the form of modern slavery it is. The challenge of walking the line between keeping communities safe and identifying when those who are committing crime are themselves victims needs to be met head on – even when that means more complex investigations rather than quickly tying up a case. Preventing vulnerable people falling prey to this kind of exploitation and supporting them to build a safe new life involves a range of agencies and communities should be at the heart of this approach. No one support system can meet the range of needs. Modern slavery affects all our communities – if we do not root it out and address the underlying causes of vulnerability the count of the number of lives harmed will continue to increase.

Recognising victims and tackling perpetrators

Recommendation 1

The Government should amend the Modern Slavery Act 2015 to make it work better for criminal exploitation, amending the Act as follows:

- Amend the title of the Act to the 'Modern Slavery and Exploitation Act';
- Amend section 3 of the Act to specifically add criminal exploitation as a form of exploitation and including a definition of criminal exploitation;
- Amend Part 2 on Slavery and Trafficking Prevention Orders and Risk Orders as we have previously recommended to make imposition of an STPO mandatory on conviction for MSA 2015 offences and to require notification of an offender's name and address as part of all STPOs and STROs (creating a national register for modern slavery offenders – similar to the sex offenders register). Also to allow imposition of orders on acquittal for modern slavery offences and conviction for other related offences where exploitation is indicated; to empower the Chief Constable of British Transport Police to apply to the court for orders to be made, varied, discharged or renewed; and allow police forces to apply for orders in respect of individuals not residing in their force area.



Recommendation 2

Training on criminal exploitation of both adults and children must be embedded in core training for professionals likely to come into contact with victims.

- This must be mandatory training and start early, with modern slavery and criminal exploitation courses embedded within both professional qualifications and inductions into post.
- The training should help professionals spot the signs of criminal exploitation and know what to do when they identify it, including making clear that it is a form of modern slavery and clarifying how statutory responsibilities under the Modern Slavery Act and other related responsibilities under the Children Acts and the Care Act apply.
- The training should cover police officers, social workers, housing officers, teachers, NHS staff, HM prison and probation staff, but also staff delivering commissioned services. Local Authority commissioning and assurance processes, including service-level agreements and contracts, must ensure that organisations and individuals who are delivering services for them know how to spot signs of criminal exploitation and other forms of modern slavery and how to report them.

Recommendation 3

The Government should create a specific offence to criminalise the act of cuckooing as a form of modern slavery (see our previous reports 'Cuckooing 2021', and 'Slavery at Home' 2023).

The provision should:

- ensure victims have access to support and special measures in court as modern slavery victims,
- ensure those offenders who are themselves victims of modern slavery are able to access the statutory defence,
- should be identifiable in recorded crime and court statistics.

Recommendation 4

Every opportunity must be taken to safeguard potential victims of criminal exploitation identified in the criminal justice system. The Home Office should update the guidance 'Criminal exploitation of children and vulnerable adults: county lines' and the Modern Slavery: statutory guidance for England and Wales (under s49 of the Modern Slavery Act 2015) to set out a clear referral pathway to local charitable diversion programmes for young people exiting youth justice services because a prosecution has been dropped due to the young person being a victim of criminal exploitation.

Recommendation 5

To identify challenges and ensure good practice in the response to victims of criminal exploitation in the criminal justice system:

- HMICFRS should conduct an inspection into the identification and treatment of victims of criminal exploitation and pursuit of their exploiters by police forces highlighting best practice and areas for improvement.
- The Home Office and Ministry of Justice should require collection by the CPS and Police Forces of anonymous data on the number of individuals raising the statutory defence and outcomes in those cases, and the number of CPS decisions not to prosecute on the grounds that a person is a victim of modern slavery, whether or not the statutory defence has been raised. The data should be published annually.

Recommendation 6

The Home Office should publish an evaluation of the devolved NRM decision-making pilots for children, complete a full national roll out of devolved decision-making by 2025, and undertake a scoping exercise to expand the approach to adults.

Recommendation 7

The Home Office and the Ministry of Justice should smooth the pathway for victims into the NRM and MSVCC support from prison by:

- Making HM Prisons and Probation Service a First Responder able to refer prisons to the NRM;
- Providing training for prison and probation staff on modern slavery, the NRM and specifically criminal exploitation so they are able to identify potential victims and connect them with support;
- Establishing a clear pathway for potential victims to be referred to the MSVCC so a support plan and connection can be made prior to a potential victim's release from prison.



Empowering victims to build a new life and prevent re-exploitation

Recommendation 8

The Home Office should conduct a review of the access that victims of criminal exploitation (both adults and children) within the NRM have to specialist crime diversion support to protect them from re-exploitation and continued criminal activity. This review should consider:

- how many adult victims and how many child victims are accessing specialist diversion/re-exploitation prevention support;
- the barriers to victims accessing specialist diversion support;
- what type of support is provided, by which organisations and in which locations;
- what specialist diversion support is provided to victims who raise the statutory defence under s45 of the Modern Slavery Act;
- the role and impact of the ICTG service in preventing re-exploitation and facilitating access to diversion services;
- the scope for including access to specialist diversion support within the new MSVCC.

Recommendation 9

The Home Office should make the ICTG service a comprehensive national service by:

- completing the national roll out across the whole of England and Wales as soon as possible;
- publishing evaluations of the current pilots to extending direct support to children who have someone with parental responsibility and those beyond the age of 18 and announcing whether those models will be made available across the whole country;
- establishing with Barnardo's a pattern of publication of statistics related to children receiving support from the ICTG service.

Recommendation 10

Local authorities should provide holistic support for adults who are at risk of or have become victims of criminal exploitation:

- The Department for Health and Social Care should issue guidance for local authorities on assessing and supporting adult victims of criminal exploitation as adults at risk under Care Act 2014;
- The Home Office should update the guidance 'Criminal exploitation of children and vulnerable adults: county lines' to add reference to responsibilities of adult social care under the Care Act;
- DLUHC should initiate pilots of complex needs navigators to provide outreach support to prevent vulnerable people falling into homelessness and exploitation building on existing initiatives taken by local authorities under the Rough Sleeping Initiative fund.

Recommendation 11

The Home Office should set out in the Modern Slavery Act Statutory Guidance a clear, agreed process for obtaining consent from young people turning 18 while awaiting an NRM decision and transitioning them into MSVCC support or local authority or other support if they decline to enter the NRM. This process should begin at least three months before the young person's 18th birthday. The process should be developed in consultation with First Responders, the MSVCC contractor and subcontractors, the ICTG service and local authority social services.

Recommendation 12

All victims of modern slavery who are eligible for social housing should be exempt from local connection conditions and have priority access to social housing. This should include victims of criminal exploitation and cuckooing and should not necessarily depend on them consenting to a referral to the NRM:

- DLUHC should amend the guidance to local authorities on providing accommodation to victims of modern slavery so that it provides the same strong direction for exemption from the local connection requirement as in guidance related to victims of domestic abuse.
- Amend the Housing Act 1996 so that victims of modern slavery are exempt from local connection conditions and have priority access.

Recommendation 13

Funders of community groups and charities should prioritise sustained funding for providing youth work, activities and support to young people and vulnerable adults at risk of or who have experienced criminal exploitation.

Including:

- Adjusting funding models so more multi-year funding is available. The Home Office specifically should change its funding model to Violence Reduction Units (VRU), and VRUs should likewise provide multi-year funding to the projects they support.
- Modifying Key Performance Indicators required as part of grant funding with attention to depth and effectiveness of work in preventing criminal exploitation, not simply high numbers of individuals provided with short term interventions.
- The Government should establish a Youth Infrastructure Endowment which harnesses the power of match funding to turbocharge an expanded government grant funding pot from which to embark on an ambitious programme of building new youth clubs and services. (see CSJ, *Game Changer*, 2023)



Strengthening community and partnership responses

Recommendation 14

DLUHC should work with the Regulator of Social Housing and the new Ombudsman for the private rental sector (resulting from the Renters (Reform) Bill) to issue guidance for all landlords (social and private) and housing associations on the risk factors, indicators and best policy and practice for responding to cuckooing.

Recommendation 15

Every local authority should establish multi-agency case conference processes (like MARAC, or MASH) to respond to every potential victim of criminal exploitation (and all other forms of modern slavery) at identification and to monitor and ensure support for victims' care needs before and during the NRM if they are referred and outside the NRM if not (see CSJ and Justice and Care, *A Path to Freedom and Justice*, 2022).

- Multi-agency case conferences should involve MSVCC subcontractors.
- Social housing providers should also be included in case conferences and able to refer tenants they are concerned may be victims of modern slavery and exploitation.

Recommendation 16

The Home Office and Chief Constables should prioritise and resource increased neighbourhood policing. Including:

- Increased police numbers to provide neighbourhood police in every local community building on hotspot policing initiatives as set out in the Anti-Social Behaviour Action Plan.
- Guidance and KPIs for police forces on building relationships with local residents and community groups so that policing is done 'with' not 'to' the community building on the experience and guidance on the 'Clear, Hold, Build' tactic.

Reducing vulnerability and preventing exploitation

Recommendation 17

The Home Office, Department of Education and DLUHC should work with local authorities and police to increase data collection and analysis to identify rates of criminal exploitation and risk factors at local and national level. For every person (adult or child) identified as a possible victim of criminal exploitation (ideally all forms of modern slavery) whether or not they are referred to the NRM the following data should be collected and anonymously analysed:

- child protection/looked after status,
- schooling and absence,
- neurodiversity, mental health issues and other social care needs of the victim (and their parents/guardians if under 18),
- substance misuse issues (and their parents/guardians if under 18),
- housing and homelessness status.

Recommendation 18

The Department for Education should update the statutory guidance 'The Children Act 1989 guidance and regulations Volume 3: planning transition to adulthood for care leavers' to include a specific section on considering the risks of exploitation for care leavers and requiring consideration of the type of accommodation, location of that accommodation and the need to enable continuation of protective factors in a young person's life such as proximity to new and existing services and support networks.

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- Tackling addiction by re-establishing and maintaining an adequate network of residential rehabilitation facilities to support meaningful recovery for the most vulnerable as a matter of urgency (see CSJ, *Road to Recovery, 2019*).
- Strengthening families and preventing family breakdown by giving employee fathers statutory time to attend four antenatal appointments and improving the terms of statutory parental leave (see CSJ, *A Submission to Government for Implementing the Family Help Teams, 2022*).



APPENDIX

Research Participants

Statutory agencies and NGOs
(charities, social enterprises and
other community groups)



London and the South East

- Avenue Centre for Education
- Brighton and Hove City Council
- Catalyst
- Craig Barlow, Independent Forensic Social Work Consultant & Criminologist
- Croydon Council
- East Sussex County Council
- MOPAC Rescue and Response Partnership
- Red Thread
- Surrey Police
- Sussex Police
- The Passage
- Westminster City Council
- West Sussex County Council



Midlands

- Action Homeless Leicester
- East Midlands Special Operations Unit
- Exaireo
- POW Nottingham
- West Midlands Anti-Slavery Network



North East

- Action for Children
- Changing Lives Liberty Project
- Edge NE
- Livin Housing Ltd
- Newcastle City Council
- Northumbria Police
- Oasis Community Housing



North West

- Diversity Matters North West
- Greater Manchester Combined Authority
- Greater Manchester Police
- Manchester City Council
- Oasis Centre, Gorton
- Pure Insight
- Rochdale Council
- Rochdale Women's Welfare
- Salford Borough Police
- Stockport Homes
- The Bond Board



Yorkshire and Humber

- Calderdale Smartmove
- Cat Zero
- Children, Young People and Families Consortium South Yorkshire
- Coalfields Regeneration Trust
- Causeway
- Dewsbury Community Outreach
- GASPED
- GIPSIL
- Huddersfield Welcome Centre
- Kirklees Council
- Palm Cove Society
- Reflections CIC
- Rush House
- Sheffield Community Links
- Snowdrop Project
- SYNC
- Voluntary Action Sheffield
- West Yorkshire Police



Wales

- BAWSO
- Cardiff City Council
- Gwent Police
- North Wales Victim Support
- Regional Modern Slavery Human Trafficking MARAC Coordinator – ROCU
- Swansea Youth Justice Service



National

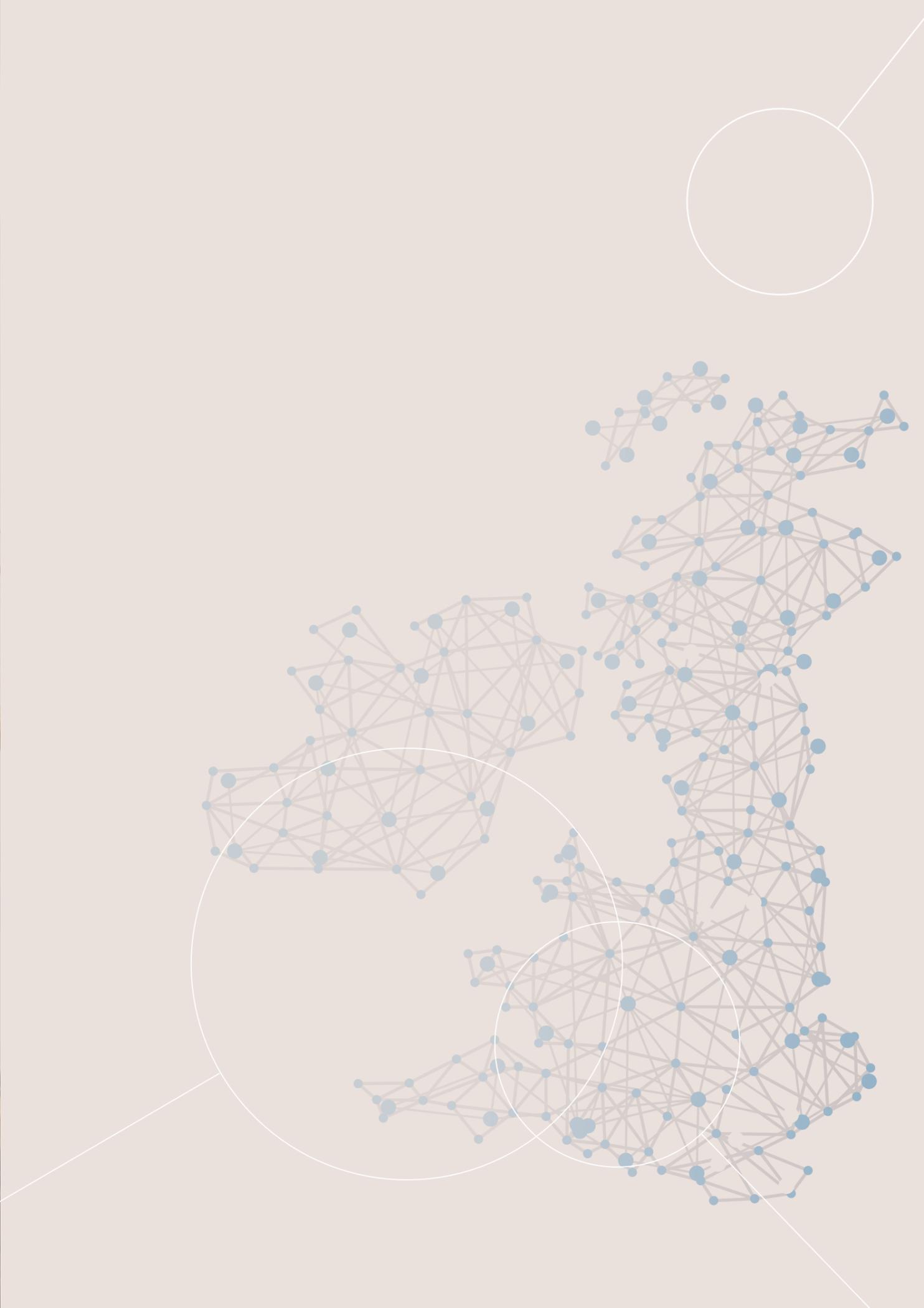
- Barnardo's
- British Transport Police
- Catch 22
- St Giles Trust
- Modern Slavery and Organised Immigration Crime Unit



Independent and Lived Experience Consultants

- Alicia, Human Trafficking Foundation Lived Experience Advisory Panel
- Alan, Human Trafficking Foundation Lived Experience Advisory Panel
- Caroline Haughey, KC
- Colin Carswell, Modern Slavery Consultant
- Colin Ward, Modern Slavery Consultant and Trainer
- Emily, Human Trafficking Foundation Lived Experience Advisory Panel
- Members of The Passage's Experts by Experience Panel
- Lee, a community service user with lived experience from Yorkshire
- Nelson Omorogon, Lived Experience Consultant
- Sabrina Hewitt, County Lines and Exploitation Specialist
- Sosa, Human Trafficking Foundation Lived Experience Advisory Panel





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