

ALL WALES PRACTICE GUIDE

Last updated: February 2021

Safeguarding children from Child Criminal Exploitation (CCE)

To be used in conjunction with the Wales Safeguarding Procedures

Who is this practice guide for?

This guide is primarily for practitioners working with children (up to the age of 18).

This includes those working in early years, social care, education, health, the police, youth offending and youth, community and family support services (including the third sector) and foster care and residential care.

What is this guide for?

Safeguarding children is a responsibility shared by everyone in contact with children and young people.

The Wales Safeguarding Procedures support individuals and agencies across Wales to understand their roles and responsibilities in keeping children and adults safe. They support a consistent approach to safeguarding practice and procedures.

This practice guide provides additional information about safeguarding children from Child Criminal Exploitation (CCE). It should be used in conjunction with the Wales Safeguarding Procedures.

Effective safeguarding arrangements in every local authority area should be underpinned by two key principles:

- safeguarding is everyone's responsibility: for services to be effective each practitioner and organisation must play their full part both individually and in collaboration; **and**

- a child-centred approach: for services to be effective they should be based on a clear understanding of the personal outcomes for the child and what matters to them. The rights of the child should be central to the approach and their best interests should always be paramount.

There are some issues which are common across safeguarding practice guides and some which are specific to the safeguarding issue being considered:

- The United Nations Convention on the Rights of the Child (UNCRC) guarantees every child the right to grow up healthy, happy and safe. This includes to be protected from harm and be appropriately supported to recover from abuse. Practitioners and professionals should adopt [A Children's Rights Approach](#) in line with the duty of due regard to the (UNCRC) and follow [National Participation Standards](#)
- Agencies must work together to provide a joined up response to safeguarding issues as set out in the Wales Safeguarding Procedures.
- There is a statutory Duty to Report Children at Risk on relevant partners under Section 130 of the Social Services and Well-being (Wales) Act 2014. [Social Services and Well-being \(Wales\) Act 2014 Safeguarding Summary](#)
- Information sharing is central to good safeguarding practice. Practitioners must share information in accordance with data protection legislation. Data protection legislation allows for the sharing of information and should not be automatically used as a reason for not doing so. **One of the specific circumstances which provides for information sharing is in order to prevent abuse or serious harm to others.** When information is not shared in a timely and effective way, decisions about how to respond may be ill informed and this can lead to poor safeguarding practice and leave children at risk of harm.
- We know that sensory impaired and disabled children are at an increased risk of being abused compared with their non-disabled / non-sensory impaired peers. They are also less likely to receive the protection and support they need when they have been abused. Practitioners and professionals should explicitly recognise the increased vulnerability of sensory impaired and disabled children to abuse and neglect, as well as the barriers they may face, especially around communication and provide for any additional safeguards needed to protect them.
- Professionals and practitioners should familiarise themselves with the culture and beliefs of those families they work with. Practitioners should not be afraid to ask about particular behaviours and the reasons for them in a sensitive manner and should never overlook potential harmful practices on the basis of cultural sensitivity.

- There are central and obvious concerns to be addressed in planning for the care and support needs of children with Unaccompanied Asylum Seeking Children (UASC) status. [Welsh Government Unaccompanied Asylum Seeking Children Guidance for Professionals](#) is available. Where the age of a potential child victim is disputed agencies should continue to treat the individual as a child until age is established [Age Assessment of UASC](#). It is important to remember that practitioners must still consider specific safeguarding measures as part of their planning with and for the child.
- All practitioners must be alert to the possibility of the child being at risk of harm regardless of the setting they are living in, whether in foster care, adoptive placements or a children's home. Children in placements or those who are adopted will have relationships that may include foster carers, adoptive parents, birth parents, siblings or other birth relatives. These relationships and any contact may be positive and welcomed or undesired and deemed a risk. Children's past experience of abuse and neglect may leave them at risk of having emotional, behavioural and mental health difficulties, which may continue to make them vulnerable.
- Our response to safeguarding issues should be proportionate, child centred and based on the individual needs and circumstances of the child. Children need to be meaningfully involved in the planning of their care and support.
- **Children should be seen and heard.** Evidence from Child Practice Reviews has highlighted the need for children to meet on their own with practitioners, away from parents and carers in an environment where they feel safe, so that the child can speak about the impact that the circumstances which have prompted safeguarding concerns are having on them. There are too many cases where the child was not seen or asked their views or feelings, or where this did not happen enough. Providing time and space to listen directly to children supports a child-centred system and promotes good safeguarding practice.
- Child Criminal Exploitation is a safeguarding issue. Children who are abused through CCE should be considered as children first and their care and support needs should be considered in the same way as for any child. Child Criminal Exploitation can and does cause significant harm to children.

Definition

Child Criminal Exploitation (CCE) -

Is a form of child abuse which involves criminal exploitation and requires a safeguarding response

- ▶ *Children are involved in criminal activities including the movement of drugs or money which results in personal gain for an individual, group or organised criminal gang.*

Involves a child

- ▶ *It occurs to those up to the age of 18 years old.*

Involves enticement and/or force

- ▶ *Involves an element of exchange and can still be exploitation even if the activity appears consensual.*
- ▶ *Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.*
- ▶ *Is typified by some form of power imbalance in favour of those perpetrating the exploitation.*

Introduction and evidence base

- CCE has been recognised as a form of child abuse relatively recently and much of our knowledge of this form of abuse is related to information about [County Lines](#)¹ which are illegal business models managed and operated by gangs which use their position and power to groom, recruit and exploit children for the purpose of criminal gain. However, this is not the only way in which children are criminally exploited.
- There are cases from Wales involving single perpetrators (including family members) who have exploited children and involved them in criminal activity for personal gain. There is also evidence related to connected perpetrators operating in groups to criminally exploit children. There is evidence of CCE related to Wales based gangs in some areas of Wales as well as children exploited through County Lines.
- CCE involves children who are UK residents and can also involve children who are trafficked into the UK in order to be criminally exploited. Children may be trafficked for criminal exploitation such as cultivating cannabis or committing street crimes. Victims are forced to provide labour to offenders for illegal purposes. The most common example involves victims forced to cultivate cannabis in private residences.²
- The risk to a young person, and their family and friends, as a result of experiencing criminal exploitation **can include but is not limited to**:³
 - Physical injuries: risk of serious violence and death

- Emotional and psychological trauma
- Sexual violence: sexual assault, rape, indecent images being taken and shared as part of initiation/revenge/punishment, internally inserting drugs
- Debt bondage: young person and families being 'in debt' to the exploiters which is used to control the young person
- Neglect and basic needs not being met
- Living in unclean, dangerous and/or unhygienic environments
- Tiredness and sleep deprivation: child is expected to carry out criminal activities over long periods and through the night
- Poor attendance and/or attainment at school/college/university
- Both males and females can be criminally exploited.⁴
- Evidence from research and practice suggests that many children who are criminally exploited have adverse childhood experiences.⁵
- Research evidences the fact that abuse and neglect can impact on brain development and that children who have been abused or neglected may not be functioning at their chronological age in terms of their physical, social, emotional, and cognitive skills.⁶
- In order to understand the circumstances through which children might become involved in criminal exploitation it is useful to consider their situation in the context of the child's individual factors, home, peers, schools and neighbourhood. Research has informed the concept of Contextual Safeguarding which recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.⁷
- Coercion and control are often employed by perpetrators and facilitators of CCE as a tool to ensure that children engage in criminal activity. This can include control through the provision of something the child wants or needs such as money, alcohol or drugs, relationship(s), a promise to keep the child safe from others or accommodation. Or control can be exercised through the threat that these things will be withdrawn if the child does not participate in criminal activity. Coercion may take the form of threats of or actual physical violence, emotional abuse or threats to hurt someone that the child cares about. However, CCE can also occur in the absence of any obvious signs of coercion or control.

- Children can fail to recognise their experiences as exploitative. However, many children do understand that they are being exploited but may still struggle to disclose or seek help because of fear of retribution, arrest or because the thing they are receiving in exchange for the abuse is important to them. Some children may understand that they are being exploited but still perceive the exploitation as the best option available to them within the context of constrained choices. Children may feel that they have very little control over the decisions that are made about them in other areas of their life and that the exchange involved in this form of abuse gives them a sense of control over what is happening to them or gives them status.
- CCE and other child protection concerns can overlap. Different types of abuse and exploitation are interrelated and this is one of the reasons why our response to children must be child focussed rather than issue based. We know that CCE is strongly related to other safeguarding issues such as going missing and child trafficking. Going missing from home or care can put children at risk of being criminally exploited or may be an indication that CCE is already taking place. Child trafficking involves the movement of a child from one place to another in order to exploit them. Children may also experience CCE as a part of Child Sexual Exploitation (CSE) or may be targeted for sexual exploitation because they are already being criminally exploited and vice versa⁸. CCE may therefore be one part of an individual and complex experience of interrelated abuse and exploitation for each child.

Indicators of Child Criminal Exploitation¹⁰

There are lots of different indicators of exploitation which should lead to the reporting of a child at risk and initiate safeguarding procedures. Only one indicator may be identified or there may be many indicators. A range of different people in the child's life may have suspicions or information about a single but different indicator. Therefore it is important that any concern is reported as a safeguarding issue straight away so that further information can be sought from all of the agencies in the child's life.

This is not a complete, exhaustive or exclusive list of indicators:

- Frequent missing episodes and being found out of area
- Found with large quantities of drugs or weapons
- Found with drugs inside rectum or vagina
- Unexplained amounts of money, mobile phones, credit, clothing, jewellery, new haircuts or other items and gifts

- Been found out of area when missing, or being arrested out of area — especially for drug related offences
- Multiple referrals for incidents in the same location
- Returned from missing episodes with injuries, or dishevelled appearance
- Change in behaviour, i.e. more secretive, withdrawn, or isolated from peers, or not mixing with usual friends
- Unexplained absences from, or not engaged in school, college, training, or work
- Increasingly disruptive, hostile or physically aggressive at home or school, including the use of sexualised language and language in relation to drug dealing and/or violence
- Expressions around invincibility or not caring about what happens to them
- Increased interest in making money
- Reports of being taken to parties, people's houses, unknown areas, hotels, nightclubs, takeaways, out of area by unknown adults or to locations identified as 'hot spots' or locations of concern.
- Increasing use of drugs or alcohol.
- Fear of reprisal from gang members or violence from young people or adults
- Having multiple mobile phones, Sim cards or use of a phone that causes concern e.g. multiple callers or more texts/pings than usual
- Possession of hotel keys/cards, or keys to unknown premises
- Disclosure of a sexual or physical assault, followed by withdrawal of the allegation
- Abduction or forced imprisonment
- Entering or leaving vehicles/cars with unknown adults
- Receiving rewards of money or goods for introducing peers
- Self harm or significant changes in emotional well-being
- Agencies unable to engage with the child or young person
- New peer groups and/or relationships

- Relationships with controlling or older individuals or groups
- Parental concerns
- Repeated STIs and/or pregnancy (can indicate CSE being a feature of the exploitation)
- Increase of referrals to agencies for known peers, associates or family members which may indicate a pattern of abuse

A proportionate response

- If the child is at immediate risk or you suspect they may go missing before their safety can be secured contact the Police on 999.
- Where the child appears safe and well and where there are no concerns about that parent(s)/carer(s) ability to keep the child safe and to support their well-being information about support should be provided to the child and their parent/carer (see appendices).
- If any agency involved with the child has concerns that the child may have care and support needs that their parent(s)/carer(s) cannot meet without support, they should seek parental consent to refer the child to the home local authority Information, Advice and Assistance service for an assessment of their needs.
 - Relevant partners have a Duty to Report Children at Risk (Section 130) under [Part 7](#) of the Social Services and Well-being (Wales) Act. Section 130(4) defines a “child at risk” as a child who:
 - **a)** is experiencing or is at risk of abuse, neglect or other kinds of harm; and
 - **b)** has needs for care and support (whether or not the Local authority is meeting any of those needs).

When a child has been reported under section 130, the local authority must consider whether there are grounds for carrying out an investigation under section 47 of the Children Act 1989.

- If Social Services make a decision that the report/referral received does not relate to a child at risk they will make a record of this and the rationale for their decision.
- Social Services of the local authority in which the child is located should make a decision on the evidence on whether to convene a multi-agency strategy discussion, to inform a decision on a response for the child, including whether to hold a multi-agency

Strategy Meeting. Representatives of each local authority relevant to the child and any Youth Justice Service relevant to the child should be involved in the multi-agency strategy discussion. There should be no delay in responding to information about a child at risk because the child is not ordinarily resident in the local authority where the safeguarding issue is identified.

- The multi-agency discussion should be informed by police advice on whether the child is at risk of immediate danger and whether some courses of action might put the child at risk of further harm.
- Consideration should be given to safe interviewing to ensure that police interviews are conducted in a way that will not put children at further risk of harm from those exploiting them. This includes a consideration of appointing an independent solicitor and the involvement of an Appropriate Adult. A guide¹⁰ is available from the Youth Justice Legal Centre which includes advice on defence lawyers' safeguarding duties to clients whom they suspect might be the victim of CCE; and advice on the practical steps that should be taken if a defence lawyer suspects that their client is a victim of CCE.
- Where there is already a care and support plan, child protection plan or they are a looked after child or they are in the secure estate, there should be a multi-agency strategy discussion to decide whether a Strategy Meeting is necessary to inform the development or review of a plan for the child.
- The arrangements for carrying out a Strategy Meeting are set out in the Wales Safeguarding Procedures and in Welsh Government [Working Together to Safeguard People Volume 5- Handling Individual Cases to Protect Children at Risk](#) issued under the Social Services and Well-being (Wales) Act. Wherever possible, the practitioners attending the Strategy Meeting should have direct knowledge of the child. It is, however, recognised that some agencies may come into contact with a child for the first time as a result of the issues being considered at the Strategy Meeting.
- The Strategy Meeting should consider if there is any information or evidence relating to the child which suggests that there are other specific safeguarding issues that need to be considered in addition to the primary presenting safeguarding issue. **The Strategy Meeting should be child centred rather than issue based.**
- Social Services should also refer to All Wales Practice Guides issued with the Wales Safeguarding Procedures on any relevant related issues such as, Child Sexual Exploitation (CSE), Child Trafficking, or Children missing from home or care.
- All children identified as potentially trafficked **must** be referred into the [Independent Child Trafficking Advocates](#) service and the ICTA service will allocate the case for direct

support to the child or for support via the ICTA Regional Practice Co-ordinator. Making a referral quickly after identification could support in reducing missing and re-trafficking.

- **The Strategy Meeting must result in a set of agreed actions to inform the development or review of a child protection and/or care and support plan for the child.** This plan must consider the holistic needs of the child in order to promote well-being and prevent future harm and must not be focussed exclusively on the management of risk.
- Where the Strategy Meeting results in an agreement that a plan is not required the rationale for this decision should be recorded and consideration should be given to making a referral to preventative services.
- Children and young people are entitled to an active offer of advocacy from a statutory Independent Professional Advocate (IPA) when they become looked after or become subject of child protection enquiries leading to an Initial Child Protection Conference. The **‘active offer’** is made directly to the child by the Advocacy Service. An ‘active offer’ is a sharing of information about the statutory right and entitlement of a child in particular circumstances to access support from an Independent Professional Advocacy Service. Information should be shared with them that includes an explanation about the role of Independent Professional Advocacy. This includes what it can and cannot do, how it operates based on their wishes and feelings, its independence and how it works solely for the child/young person, its policy on confidentiality and significant harm – it explains the statutory right of children and young people to be supported to express their views, wishes and feelings as well as their right to make a representation or complaint.

Appendices

These organisations are there for all children and young people in Wales. Professionals and practitioners should let children know about these organisations and how to contact them.

Meic is the helpline service for children and young people up to the age of 25 in Wales. From finding out what’s going on in your local area to help dealing with a tricky situation, Meic will listen even when no-one else will. They won’t judge you and will help by giving you information, useful advice and the support you need to make a change. You can:

- Chat to someone from Meic on-line: <https://www.meiccymru.org/>
- Call Meic for free and talk to someone: **0808 802 3456**

- Text Meic for free on: 84001

You can contact the [Children's Commissioner for Wales](#) Investigation and Advice service which is free and confidential. It's there as a source of help and support if children and young people or those who care for them feel that a child's been treated unfairly. You or you parent/carer can:

- Call the service for free: **0808 801 1000**
- Email the service: advice@childcomwales.org.uk

Childline is a free, private and confidential service where anyone under 19 can access support and advice. The Childline website www.childline.org.uk has information and advice pages as well as tools to help you work through problems yourself. If you want to talk or chat to Childline you can:

- Call Childline for free: **0800 1111**
- Register on-line to email Childline or chat on-line to a counsellor: www.childline.org.uk/get-support/

If you want to talk to Childline in Welsh see www.childline.org.uk/get-support/

The Childrens Society

Are you worried about your child being criminally exploited?

- Do you think they may be involved in selling drugs or other types of criminal activity?
- Have you seen a change in behaviour recently and don't understand why?

What does criminal exploitation mean?

- When children are used by people, sometimes in gangs/groups, for criminal activity such as carrying or selling drugs/weapons, running money through ticket machines, helping with robberies.
- Sometimes children get sent out of the area, and they may be away for days at a time
- When children are sent by older people to commit crime which is of benefit to the older person, gang/group, this is **exploitation and trafficking**.

It important to know that **you are not alone** and not to blame. There are many parents and carers in similar situations and there are things you can do to help protect your child:

- Report your concerns to Social Services. A social worker can help you take steps to protect your child. They will make an assessment based on concern your child is at risk of harm from outside of the family.
- If you would like more support, go to other professionals who can help: your GP, school, police or a youth worker.
- You can report your concerns to the police and say ‘I suspect my. child is being trafficked for criminal exploitation’.
- If your child isn’t where they are supposed to be, report them missing straight away on 101. **You do not have to wait 24 hours.**
- If your child is picked up in a car, or has train or bus tickets, keep a record of this information to give to the police or social worker.
- There may be other evidence that your child is being exploited, such as interactions on social media, unexplained money or phones, clothing or gifts, change in behaviour; where possible try to keep a record of this.

Don’t be worried about contacting the police – you are trying to protect your child

- Speak to your child about what you’re worried about.
- Let them know they aren’t in trouble – and that you’re worried.
- There may be threats made against you or your family by the people exploiting your child. Your child may believe that they are protecting you. Let your child know that you know about this risk and that it is not their responsibility to protect you.
- If you are concerned about your child’s immediate safety call the police on 999

Getting help and support

Lots of children and young people and their families need some help and support sometimes.

If you would like some support for your child and family then you can find out about local services by contacting:

Family Point Cymru

www.familypoint.cymru/families-first-wales/

0300 222 57 57

DEWIS Cymru

www.dewis.wales/children-and-families

The police or someone else who works with your child might offer to make a referral to social services so that they can decide if your child has care and support needs and what help they can offer your child and family.

If the police or someone else is worried that your child is at risk of harm they will report this to social services so that they can assess if support needs to be put in place to help keep your child safe.

Certain frontline staff who encounter a potential victim modern slavery or human trafficking have a duty to notify the Home Office under Section 52 of the Modern Slavery Act 2015. This requirement applies to the Police, Local Authorities, the National Crime Agency and the Gangmasters Labour and Abuse Authority. Supporting guidance and resources have been issued in relation to the [Modern Slavery Act 2015](#).

¹ Home Office (2017) [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

² www.antislaverycommissioner.co.uk

³ www.childrenssociety.org.uk

⁴ www.csepoliceandprevention.org.uk

⁵ JSNA Report (2015) *Child Exploitation*

⁶ Child Welfare Information Gateway, Issue Brief, November 2009, *Understanding the Effects of maltreatment on Brian Development*, US Department of Health and Human Services

⁷ contextualsafeguarding.org.uk

⁸ www.nationalcrimeagency.gov.uk

⁹ The Children's Society, Victim Support and NPCC (2018) [Young People Trafficked for the Purpose of Criminal Exploitation in Relation to County Lines- A Toolkit for Professionals](#)

¹⁰ [Modern-Slavery-Guide-2018.pdf](#)