CHILD CRIMINAL EXPLOITATION AND COMMUNITY DEVELOPMENT IN BEDFORDSHIRE

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Overview of Project Aims and Findings

This report is one of three site reports examining responses to County Line's criminal exploitation. County Lines is a criminal business model which involves the 'transportation of illegal drugs, by gangs and organised criminal networks, from one area to another within the UK, using dedicated mobile telephone lines (National Crime Agency, 2017). The decision to select Bedfordshire as a research site was the result of evidence uncovered in our early research that a significant amount of Child Criminal Exploitation (CCE) emanated from within the County and a realisation that the County was both an importer and exporter of illegal drugs via County Lines. Our findings suggest a clear need to formulate responses that do not underplay or overplay safeguarding and criminal justice interventions in and beyond Bedfordshire. The resulting recommendations detailed in this report seek to:

- Highlight the proximity of criminal exploitation to local organised crime
- Equip policymakers and practitioners to manage the risks arising from County Lines
- Identify how more local neighbourhood interventions combined with a County-wide strategic overview might build resilience to gangs and local organised crime groups and effectively disrupt County Lines activities.

A SWOT Analysis

In our analysis of how these recommendations might be realised, we undertook a rapid SWOT analysis of the agencies and organisations responsible for containing the problem of Child Criminal Exploitation in Bedfordshire. A SWOT analysis is a strategic planning and management technique to help a person or organisation identify Strengths, Weaknesses, Opportunities, and Threats related to their core activities and management. The technique is designed for use in the preliminary stages of decision-making processes and can be used as a tool for evaluation of the strategic position of organisations of many kinds. It is intended to identify the internal and external factors that are favourable and unfavourable to achieving the objectives of the venture or project.

The **STRENGTHS** we observed include a dedicated workforce of committed professionals duty-bound by safeguarding policies and guidelines, growing recognition amongst practitioners and managers of the County Lines brand and County Lines activity, and the dangers this brings. Innovative community-based initiatives have been developed through the Violence and Exploitation Reduction Unit (VERU), the Tree Project and Dallow Cares, which deliver interventions in affected neighbourhoods.

The **WEAKNESSES** we observed involved some professionals' current knowledge and awareness of National Referral Mechanism processes linked to Modern Slavery in County Lines drug distribution networks in some agencies. Information sharing between some agencies and intelligence cycles requires further development. There is a lack of multi-agency strategic oversight across the County, including monitoring and mainstreaming local action plans into a County-wide strategy. The absence of a dedicated Community Safety manager in Luton is a particular strategic weakness in sustaining innovative community-based projects.

OPPORTUNITIES have recently arisen due to Dame Carol Black's Independent Review of Drugs and the resulting financial commitment across the Government to reduce the supply and demand of illicit drugs. Significant resources were made available to Bedfordshire Police to address serious organised crime. Given these resources, there is potential for concomitant policy development focussing on supply and demand reduction strategies.

The **THREATS** concern the further evolution of gangs into local organised crime networks. This evolution can overwhelm affected neighbourhoods which lack appropriate professional resources to encourage community involvement.

Recommendations

1. Continuous Professional Development should be provided in Bedfordshire as part of training for all front-line staff involved in criminal exploitation safeguarding, including the voluntary sector, Crown Prosecution Service, Magistrates and Judiciary. Training should ensure competencies in Child Criminal Exploitation (CCE), drugs, gangs, organised crime, and Contextual Safeguarding. Training should be co-facilitated by professionals with knowledge and backgrounds from diverse professions to encapsulate the differing and shared emphases on the cases and scenarios discussed. Resources for the training should be sourced from a pooled training budget.

2. Monitoring and oversight of business dividends and project spending in Luton should continue with attention to public transparency to ensure confidence from communities that public spending addresses legitimate concerns.

3. Bedfordshire police should routinely flag gang-related and drug-related violence to analyse illegal drug market stability. This could inform targeted interventions aimed at preventing violence.

4. Partnerships should consider investment in appropriate preventative services to reduce severe violence and homicide (suggestions for preventative interventions are discussed below).

5. Nationally, we recommend that the NCA engage relevant experts in cybersecurity to research and assess the possibilities and projected costs for integrated and automated systems for managing intelligence for cross-border criminal activities.

6. Local County Lines returns for numbers involved in the workforce should be scrutinised further to ascertain any reporting artefacts or actual changes in the operating model, such as franchising, to the business model.

7. County Lines activities in prisons should be addressed as a priority.

8. To provide further opportunities for safeguarding, we recommend that ERSOU assist local Borough Command Units (BCUs) in reviewing the reporting processes and returns to the NCLCC. Particular attention should be paid to assessing sexual offending and domestic violence connected with high-harm individuals and gangs to obtain a consistent and accurate picture of gang-involved and gang-affected young women and girls.

9. We recommend injectable opioid-assisted therapy across Bedfordshire to reduce harm and isolate the drug market from the criminal fraternity.

10. Enforcement agencies should prioritise actions against those who control the drug supply workforce. Appropriate civil orders should be sought to target these offenders. These actions should be utilised as a "signalling event" to send a deterrent message to the broader drug supply network and deter further exploitation (see Appendix 3).

11. Standard practices for scoring harms should be adopted as part of ongoing Continuous Professional Development (CPD) for Nominated Scorers. Reflective practice sessions or "Advisory Boards" should be facilitated between regions. This process would examine dip-sampled work and case studies similar to the reflective process outlined in Appendix 1.

12. It is recommended that a dedicated Community Safety Role be created in Luton Borough to provide honest brokerage in reviewing current strategies and align national priorities with local needs.

13. Bedfordshire has a successful track record of utilising public health messages therefore, building on this success, we recommend a strong public health campaign to counter the stigma of relatively poor white and racialised neighbourhoods and to encourage communities to come forward and speak to statutory services about concerns regarding drugs and drug markets.

14. Dallow Cares, The Tree Project and the VERU have shown innovative practices outlined in the report, which have the potential for further development into inter-agency gang desistance teams delivering interventions in neighbourhoods locally as part of a Bedfordshire-wide comprehensive strategy. Suggestions have been made for developing the Dallow Cares approach, but further review and prioritisation of strategies and action plans are needed to coordinate such an approach across Bedfordshire. It is hoped that this report provides the catalyst for such developments.

Introduction

According to Bedfordshire Police (2023), more than 400 victims of modern slavery were identified in Bedfordshire last year, the ninth highest of any police force area in the country and higher than other force areas such as Northern Ireland and Merseyside. Respondents in the research often mentioned that Bedfordshire faced similar challenges to London boroughs without equivalent resources to address these challenges. Nationally, recent critiques regarding interventions with vulnerable young people involved with 'County Lines' drug dealing suggest an urgent need to develop responses which balance the safeguarding needs of the children and young people and the imperatives of criminal justice agencies (HMIFRS, 2022; National Safeguarding Practice Review, 2020; Dempsey, Children Commissioners' Report, 2021; Pitts, HM Inspectorate of Probation, 2021). Bedfordshire was chosen as a research site because of its significance as both an importer and exporter of drugs. The County Lines model is described in the Home Office Serious Violence Strategy (2018) as:

> ... *where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The 'County Line' is the mobile phone line used to take orders of drugs.*

Achieving a balance between safeguarding and enforcement requires a strategic approach that resolves intra-agency and inter-agency barriers to effective and proportionate intervention.

The Ending Gang and Youth Violence Report (2011) recognises the importance of engaging communities as partners to end violence. Many recent drug-related disruption initiatives have targeted areas affected by the activities of individuals who meet the highest harm scores, as measured on the Managing of Risk in Law Enforcement (MoRiLE) scale. These interventions utilise the more flexible framework of Clear, Hold, Build (CHB), as announced by the National Police Chief's Council in 2023, designed to tackle organised crime threats in partnership with local communities. The CHB approach was first used as a local counter-insurgency measure in Afghanistan. Evaluations of the approach point out that understanding the relationship between security, development and governance at a local level is required to maximise its effectiveness. As Ucko (2013) argues:

> *Thus, problematised, clear-hold-build emerges as a framework with heuristic utility, a schema that can be helpful in planning but which must, at the time of application, be populated by knowledge, substance, and skill.*

This report assesses the potential for this and other localised neighbourhood-based approaches to prevent and disrupt County Line's activity (see below).

Bedfordshire comprises three unitary local authorities: Bedford, Central Bedfordshire and Luton. Except for County-wide service providers, interviews were conducted with Luton and Central Bedfordshire respondents. Given the time scales and the project's scope, the report does not review individual borough partnership arrangements and action plans from sub-groups in detail but does make observations about current multi-agency working arrangements and recommendations for future prioritisation and possible strategic developments.

Methodology

The research proposal was peer-reviewed by subject experts on behalf of the British Academy as part of an Innovation Fellowship Scholarship. The University of Suffolk provided ethical approval for the study. The project team underwent relevant checks for work in the safeguarding and crime fields. A focused literature review regarding gangs, County Lines and drug dealing networks informed the study, which also involved a rapid assessment of available data. Data was collected from 28 semi-structured interviews with those directly involved in a variety of policy, practice and community roles in the County of Bedfordshire comprising seven respondents from Central Beds, sixteen from Luton, (four young people who, by their admission, had direct involvement with gangs in Luton and a young person who was a university student resident in Luton). Interviews with 49 respondents in other sites, including regional policing, prison, and probation staff in Bedfordshire, also helped clarify the nature and incidence of contemporaneous child exploitation in County Lines networks.

A detailed analysis of other sites is available. All data collected was anonymised. The research also aimed to discover whether the implicit and explicit beliefs and assumptions (i.e. theories) informing current interventions were valid and, if not, how they might be reformulated to reflect an external reality. The methodology originates in a version of Participatory Action Research, developed initially by Kurt Lewin in the 1940s and 1950s and later re-worked by Pawson & Tilley (1997) as the 'Realistic Evaluation' or 'Theories of Change' model.

In developing theories of change, a Rapid Assessment Exercise (RAE) involving an analysis of relevant data held in the research sites was undertaken to understand the nature and extent of the incidence of, and responses to, CCE. This was augmented by interviews with relevant social welfare and criminal justice practitioners and young people involved in CCE. Based on this data and other site reports, the researchers produced reports and gave presentations at national workshops as a preliminary analysis of the processes and practices operationalised by agencies. Locally, the research team facilitated an "Advisory Board" with police stakeholders to assist with thinking about better ways to investigate modern slavery cases. Subsequently, a policy briefing outlining best practices for "reflective practice" in complex cases was written (see Appendix 1). Further opportunities to present policy evidence became available through a Commons Committee call for evidence for Human Trafficking. The project team successfully submitted evidence and recommendations in the form of written evidence to this committee (see Appendix 2).

During the research period, activities by agencies concerned with enforcement and early help were noted to have developed further. The scoring and mapping of gangs involved in County Lines have increased, and the preventative services in one Borough continue to develop. This report is expected to inform further activities to elicit partners' perceptions, opinions, beliefs and attitudes to address the challenges raised locally. The research aims to build theories of change collaboratively that correspond more closely with contemporary realities so that interventions can be reconfigured where necessary.

The Advisory Board Model of critical reflective practice (see Appendix 1) should be rolled out for multi-agency groups addressing complex County Line criminal exploitation cases. This process could form part of the training recommended below.

Background and Context of the Research

County Lines is a relatively new phenomenon wherein vulnerable young people are recruited to distribute illicit drugs in out-of-town locations. The Home Office Serious Crime Strategy (2018) highlights the nature of the criminal exploitation involved in County Lines drug dealing:

> ... 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 forms 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.

Research has detailed the links between County Lines and the criminal exploitation of vulnerable adults and children (Akhtar & South, 2000; Bullock & Tilley, 2002; Bennett & Holloway, 2004; Palmer & Pitts, 2006; Pitts, 2007; Andell & Pitts, 2009, 2013; Densley, 2012; Ariza et al., 2014; Harding, 2014; Windle & Briggs, 2015; National Crime Agency (NCA), 2016, 2017, 2018; Coomber & Moyle, 2018; McLean et al., 2018; Andell, 2019; Hesketh & Robinson, 2019). Although these practices are deemed to be a national threat by the NCA (2019) involving serious violence, sexual exploitation and 'debt enslavement' (Black 2020), the nature and effectiveness of safeguarding responses vary significantly from agency to agency and area to area (National Safeguarding Practice Review 2020).

Dame Sarah Thornton's Independent Anti-slavery Commissioners annual report (2020-2021) highlights this difficulty:

> The possibility of criminal exploitation was not being considered at the start of an investigation, risking victims being wrongly prosecuted. However, there was also over-reliance on the trafficking decisions made by the Single Competent Authority and a failure to consider properly the legal components of the defence. This risks a case being discontinued when the matter could have been put before a jury. Most worryingly, in many cases, it was clear that non-prosecution alone was not protecting a child or vulnerable adult — there needed to be effective safeguarding. This was not happening.

This suggests that practitioners need a greater awareness of the factors driving vulnerable people towards a lifestyle they may not recognise as exploitative and dangerous, which can have serious consequences (Harding 2020). This recognition is taking shape in the Boroughs of Bedfordshire. One respondent in Bedford Borough pointed to the extra-familial safeguarding responses developed over the last three years. They said:

> So it was apparent that, like every other area of the country, extra-familial risk was becoming more and more prevalent, and a number of strategies used in the standard arena of child protection and children services weren't really meeting the needs of those elements, and it was apparent that developing a team that would be consistent and work on a family based approach; a relational approach, was needed in Bedford Borough to meet the need.   (B2)

However, in Luton Borough, a practitioner from the Youth Offending Team spoke of the need for a 'more joined-up approach' between assessments of criminal exploitation risk and safeguarding procedures. They said:

> I feel like we can never truly assess someone's risk because sometimes we're assessing risk based on what we have and what we know, and there are a lot of unknowns that could

potentially heighten risk... I think we need to work a lot more closely with children's social care and the schools and that kind of thing. Sometimes, they will hold meetings, and we're not invited, but we're holding the case. (LY1)

Many practitioners and policy makers were unaware of the links between some adolescent street gangs and the local organised crime groups that drive criminal exploitation. For practitioners, uncertainties about responses are sometimes compounded by the contradictory legal and policy landscape and the tensions between the need for care and control.

The Modern Slavery Act (2015) was designed to thwart people trafficking but has subsequently been employed in cases of criminal exploitation in County Lines. Section 45 of the Act provides a defence for individuals who are the victims of human trafficking to distribute illicit drugs. Such exploitation is established, or not, by the National Referral Mechanism (NRM). However, practitioners responsible for referrals to the mechanism are not necessarily aware of relevant case law about Child Criminal Exploitation (CCE) and Modern Slavery (Gray 2021). Beyond this, even when the NRM accepts the statutory defence, Court decisions vary from area to area. One local respondent said:

I still think there's a lot of confusion, even with myself, but across social care teams for sure, around the use in the NRM. Social Care say to me I've got a caseload of 20 plus young people, I've got all this stuff to do and what's the NRM gonna bring. Sometimes it's really hard to argue what is it gonna bring. I say a lot of them still don't understand what it's for, so it is usually the police in Bedfordshire that make the referral for the NRM. (B4)

Additionally, when the defence is accepted and the young person is returned home, research suggests that the Children's Services response, even when a young person is 'debt enslaved' and vulnerable to violent reprisal, can be perfunctory with little ongoing preventive or diversionary intervention (Home Office, 2018, Firmin & Lloyd, 2020). The ERSOU team provides well-regarded training about the NRM, but this training does not reach most of those involved with County Lines exploitation due to capacity. More must be done to ensure practitioners and policymakers can utilise this mechanism effectively.

Training should be provided in Bedfordshire as part of certificated Continuous Professional Development for all front-line staff involved in criminal exploitation safeguarding, including the voluntary sector, Crown Prosecution Service, Magistrates and Judiciary. Training should ensure competencies in Child Criminal Exploitation (CCE), drugs, gangs, organised crime, and Contextual Safeguarding. Training should be co-facilitated by professionals with knowledge and backgrounds in diverse professions to encapsulate the differing and shared emphases on the cases and scenarios discussed. Resources for the training should be sourced from a pooled training budget.

Demographics, Deprivation and Feelings

Much of the literature in the UK and North America suggests that neighbourhood is a crucial factor in gang involvement. Therefore, social factors impacting demographics play an important role in vulnerability to crime, victimisation and gangs (Pitts, 2008; Waquant, 2008). According to the My Luton website, Bedfordshire has a total population of 669,338. with over half the population of the county living in the two largest built-up areas: Luton (258,018) and Bedford (106,940). Central Bedfordshire has the highest population of the three councils. Bedfordshire has more young people under 14 and in their 30s compared with the rest of England and the Eastern Region. Bedfordshire, whilst being affluent overall, also contains some of England's most deprived neighbourhoods, mainly in Luton, and Dallow is one of these.

The emotional impacts of relative deprivation found between and within some neighbourhoods are not incidental to the study of crime but essential in tracing some of the causes of crime. Those who are relatively deprived are more likely to suffer structural and emotional strains, making them more susceptible to deviant behaviours and responses (Lea & Young,1984; Brown, 2001; Webber, 2022). Young (2003*) argues that structural conditions influence individual perception of the world and the cultural and emotional orientation towards it. He argues that:

> ...the process is not that of simple exclusion. Rather, it is one where both inclusion and exclusion occur concurrently — a bulimic society where massive cultural inclusion is accompanied by systematic structural exclusion.

It is argued that these conditions ferment emotions of resentment, blame and envy between individuals and groups. The proportion of economically inactive people, i.e. people who are not in work and have not been seeking or not been available for work, increased between 2011 and 2021 in the county, and Luton has a higher proportion of economically inactive people than Bedford or Central Bedfordshire.

The Indices of Multiple Deprivation Summary for Luton Town (October 2019) indicated it was ranked the 70th most deprived out of 317 local authorities. In 2015, Luton Town was ranked the 59th most deprived area of 326 local authorities. However, the proportion of areas in Luton Town in the top 10 per cent most deprived parts of the country has fallen, with four output areas in the top 10 per cent most deprived.

Figure 1. Comparisons of Economic Inactivity

	Luton	Bedford	Central Bedfordshire	England
2011	30.9	28.1	25.3	30.1
2021	37.6	35.3	33.6	39.1
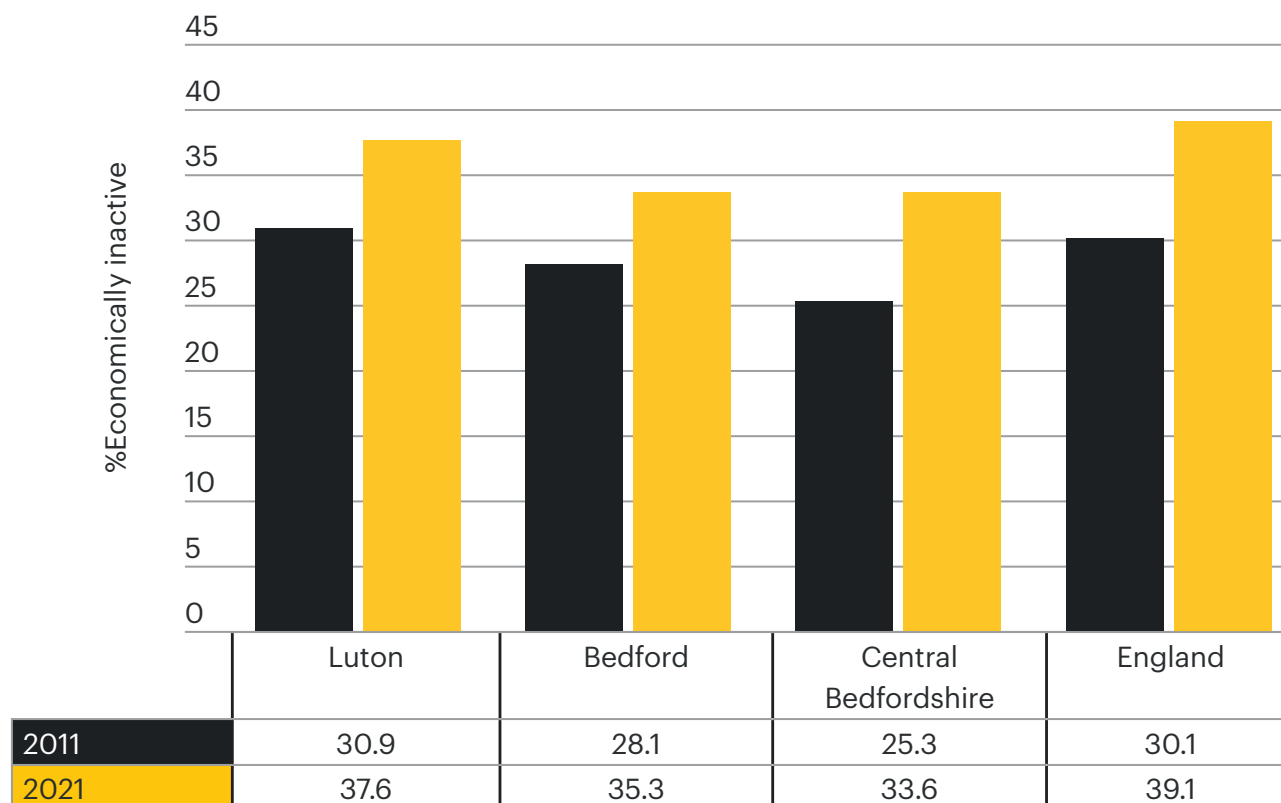
Luton Town's highest deprivation rankings are in the Barriers to Housing and Services (25th), income deprivation affecting older people (43rd) and crime (58th). Luton has a younger-than-average population. The 0–14 year age group has grown by 12 per cent in the last ten years, while numbers in the 15–64 age group grew by the marginally smaller figure of 11 per cent. Moreover, Luton has a population density of 52 people per hectare. This is greater than in some London boroughs. The risks and fears of gang-related violence for some young people in a densely populated town with a relatively small Town Centre were expressed by one young person who referred to competing gangs of young people from different areas. They said:

> If you're not from the right area, if you are in a gang, you probably get stabbed, or you just get badly hurt. I suppose you get to know where you can walk and where you don't. Yeah, it's been like that since I was in high school. (YP L2)

Other young people commented upon the negative parallels between London and Luton. One said:

> I see Luton changing into one of those cities like London yeah so that's profit before people... People don't have houses they don't have enough money to pay for the bills, and they're gonna become homeless; homeless people eventually die out or they get moved out to other cities I'm saying they throw them away so people can be easily manipulated. (YP L3)

Another young person commented:

> There is a lot of jealousy, fake; everyone's watching what you're doing, and you can't watch what your friends are doing cos that's a bad friend if your friend is watching every single movement, I don't want jealous people around. (YP L4)

Another young person questioned the palpable benefits of public spending for those who need it most. They said:

> So, like you see how London is, in London the cost of living is crazy right now I'm seeing the same here, we're getting new airport extensions, we're getting the football stadium coming realistically all stuff that the people don't really care about you understand yeah they're all for-profit they're all profit based. (YP L3)

A Policy Officer explained some of the benefits to youth services of business investments but also highlighted some past mismanagement of funds:

> Luton owns the airport and they get a dividend. This dividend usually in, times outside of Covid is about four or five million a year and what happens with a lot of this money is it goes into, things like Active Luton and, all of the things that we normally provide for young people around the town. A portion of it goes to something called the Community Investment Fund. So you know, people can apply to it, now when we first got this dividend from the airport, it was kind of, you know, free money on top of all the government grants and everything, back in the 2006/7 or whenever it started. This fund, (for youth) was about 450,000 a year which was going to three organisations and had been for the last four years... These three organizations were shocking ... None of them were working with kids as such ... when you looked at their accounts, they're all related... There's a lot of money going into people's pockets. But Luton is a very strange place. (LPO 1).

Racialisation, Radicalisation and a New Multiculturalism

Data on ethnicity, language, national identity and religion from the 2021 census was published by The Office for National Statistics on 29 November 2022. This report summarises the main points of the data for Luton. The overall population of Luton increased by 22,000 people between 2011 and 2021, a rise of 11 per cent. The 2021 census showed that the population of Luton now has a non-white majority, with 54.8 per cent of the population being non-white. Luton is one of four authorities outside of London, with most of the population being from ethnic minority groups. White British make up 31.8 per cent of the population of Luton compared with 74.4 per cent nationally. The percentage of people with English as their first language in Luton is 76.5 per cent, one of the country's smallest proportions. Of the population of Luton, 74.9 per cent have a UK identity compared with 88 per cent nationally. The number of people reporting as Christian is still the largest group in Luton, but the number of Christians fell by 11.4 per cent from 96,271 in 2011 to 85,297 in 2021. The number of Muslims increased from 49,991 to 74,191 in the last decade, an increase of 48.4 per cent.

The demographics above have provided a focus for several high-profile demonstrations from politically inspired anti-Muslim and Muslim extremist groups, which have led to well-publicised incidents. Luton has provided a national focus for debates around segregation, racism, political extremism, and social cohesion, arguably stigmatising the town (Hoque, 2018). One respondent described how Luton had become a national focus for polarised views on integration, diversity and multiculturalism, citing national demonstrations held in Luton Town. They said:

> So it hinted that there was something amiss in Britain: people took themselves all the way from Sunderland to Luton to protest about something they could have protested about outside their Town Hall. (LP 1).

Jock Young (2003) describes a "critical multiculturalism" which can rail against the mistakes of an assumed lack of assimilation. He argues that community relations problems occur not because of a lack of citizenship but because citizenship is sometimes obstructed. Crime and social disturbance occur within post-migrant communities that expect economic and legal equality but experience unfairness. This, he argues, is exacerbated by social segregation that sets one group of marginalised people against another.

Despite demographic differences in ethnicity, race and religion, many argue Bedfordshire, particularly Luton, provides the space for positive multicultural experiences. Hoque (2018) summarises this nicely:

> Even though Bury Park is a predominantly South Asian area of Luton, young Muslims were exposed to others from different ethnic and religious backgrounds from an early age. In addition to influences from the home, such interactions have profoundly shaped the way young Muslims self-identify and how they view others in society. In many cases, non-Muslims were regarded as close friends, mentors, colleagues, teammates, and even lovers.

A respondent in our study echoed the practices of a new kind of multiculturalism, speaking about the importance of teamwork that includes different perspectives. They said:

> South Asian women, born and bred in Luton, are phenomenal. My xxxx (team member) is one of those women. You know, she's religious, wears a hijab, she's part of the community. But she's Luton, born and bred, which means she comes with that attitude where she doesn't accept things just because it's expected and traditional. (L 1).

A student respondent spoke of disappointments and causes for celebration when they moved to Luton. They said,

> *It was a shock for me. Very different. One thing I did like was it is very multicultural. So a lot of different cultures. So I guess that is OK because I was used to seeing that. So I wasn't like an outcast when I came here, so I was like, OK, cool. Like yeah, I can be comfortable. It's a diverse town. Very diverse, yes, which is nice not to feel isolated. So it's not just negatives (L YP1)*

The same respondent spoke about some of the dilemmas of care and control in the policing of racialised and poor white communities. They advocated a better understanding of the hardships facing some young people. They said:

> *With kids, a lot of people have overly negative views. They think when it comes to certain ages, they are old enough to know right from wrong, they should be able to handle whatever they get. But you have to look at the bigger picture because people don't just go out there and start selling just for the sake of selling or getting involved in certain things like that. There's always a reason behind it, whether that's poverty or coming from a bad background (L YP1).*

Understanding the actions and coordinated responses to crime are crucial to developing effective policies and practices to reduce harm in criminal exploitation (Andell 2019). The section below examines crime in Bedfordshire.

General and Violent Crime in Bedfordshire

According to Police UK (2023), in the year ending December 2022, the crime rate in Bedfordshire was about the same as the average rate across comparative policing areas. In the same period, violent and sexual offences in Bedfordshire were lower than the average across similar areas. However, if Borough comparisons are made, Luton Borough has higher crime rates than Bedfordshire, as demonstrated in Figure 2 below.

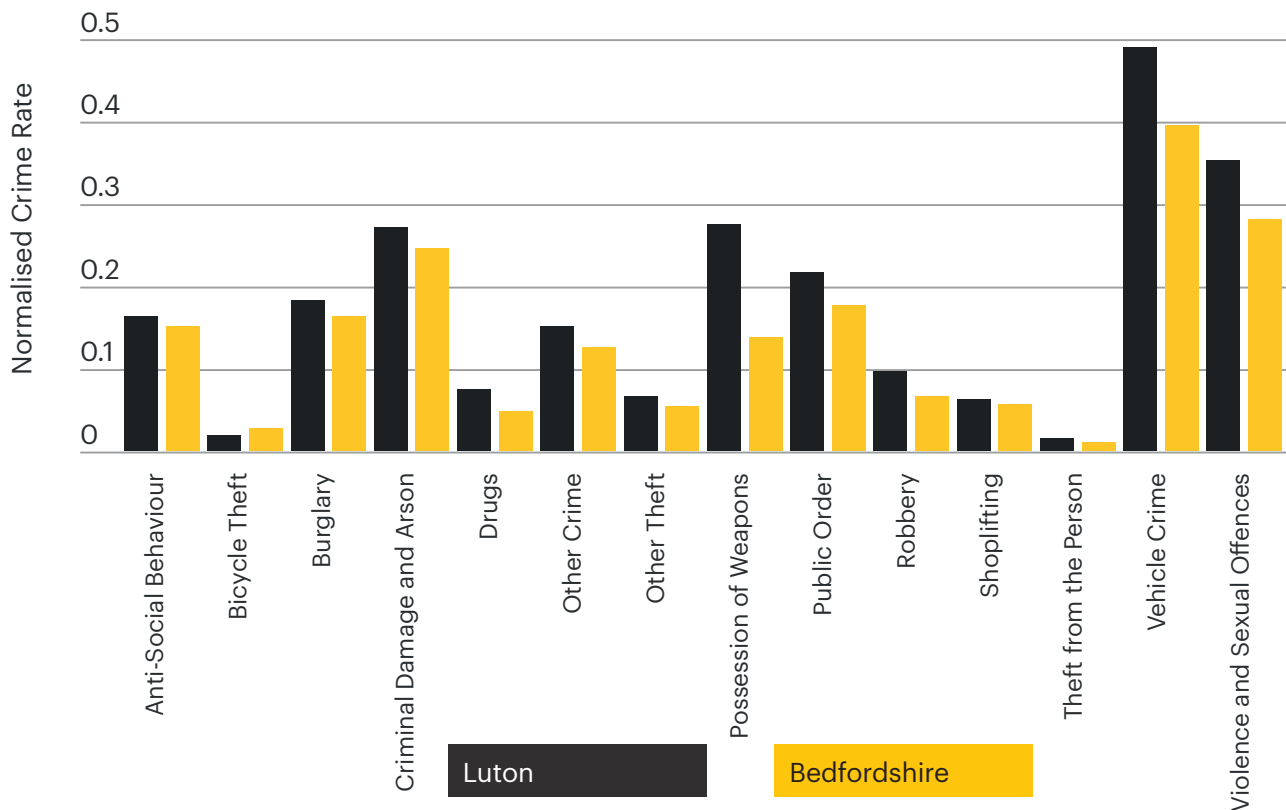**Figure 2 Crime in Luton as Compared with Crime in Bedfordshire**
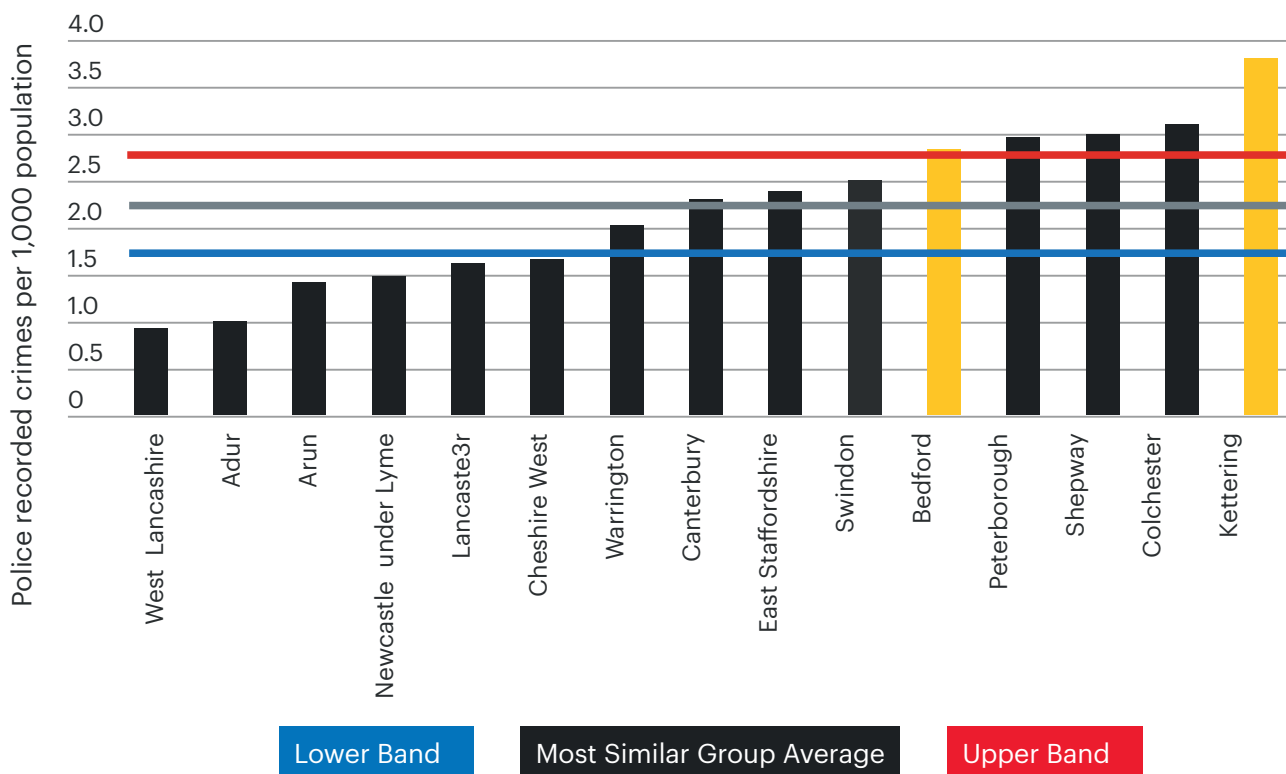

Figure 3. Drug Crime in Bedford Compared with Similar Areas

In the year ending December 2022, the drug offence rate in Bedford was higher than the average drug offence rate across similar areas.

The red and blue lines show how far the drug offence rate would normally vary from the average.
Bedford lies above the red line, so its drug offence rate is higher than normal for the group.

Figure 4 Total crime within Bedfordshire's local authorities using Community Safety data from ONS 2023. (Graph produced by Reuben Johnson, PhD Student)

	2021	2022	2023
Bedford	21199	18047	19681
Central Bedfordshire	18173	14873	15902
Luton	14944	14090	13925
Unassigned Bedfordshire	1726	1077	1396

Legend: Bedford — Central Bedfordshire — Luton — Unassigned Bedfordshire
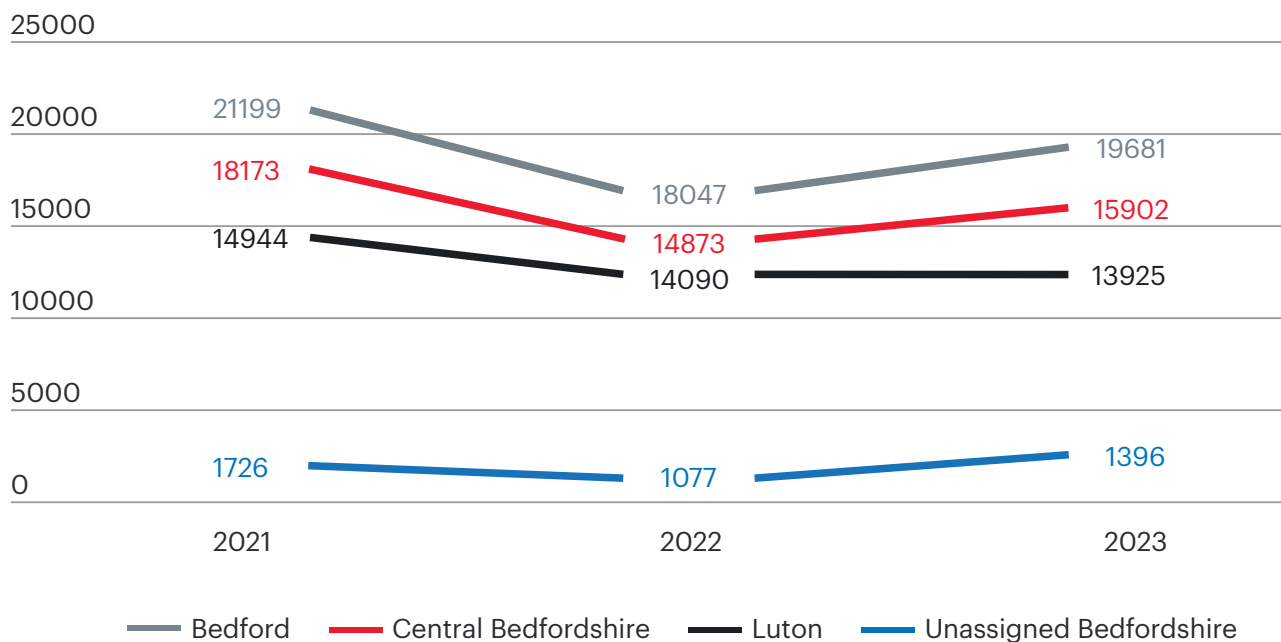
Figure 5. Violence Against The Person within Bedfordshire's local authorities 2021 -2023 using community safety data from ONS 2023. (Graph produced by Reuben Johnson, PhD student)

	2021	2022	2023
Bedford	6777	6773	7169
Central Bedfordshire	5276	5037	5324
Luton	4642	4859	4983
Unassigned Bedfordshire	619	401	555

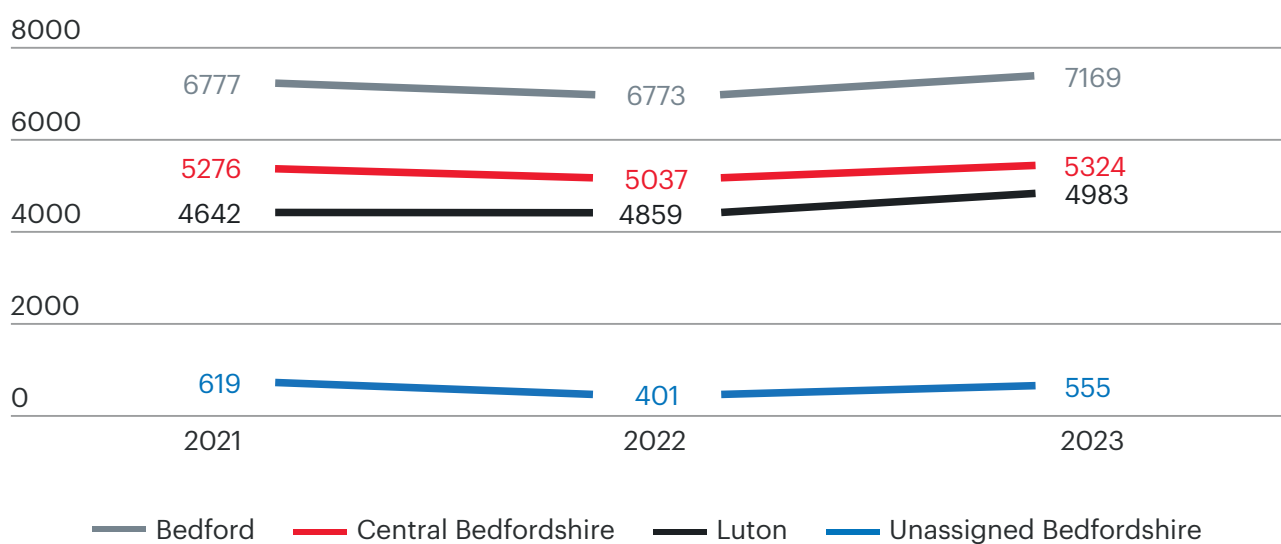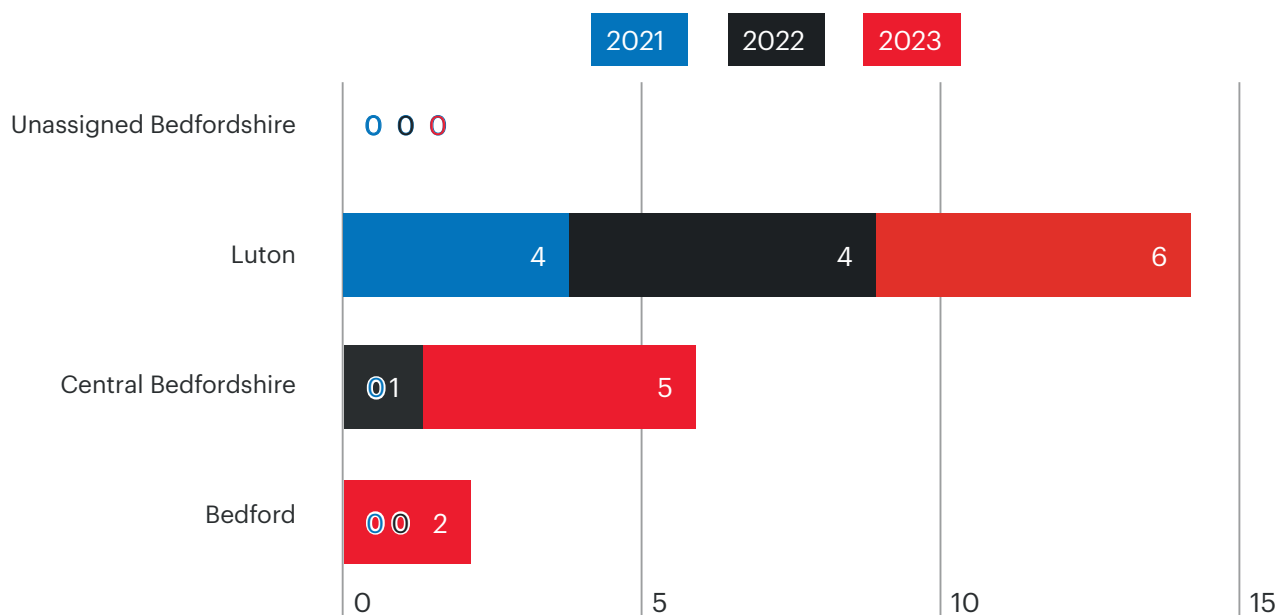Legend: Bedford — Central Bedfordshire — Luton — Unassigned Bedfordshire

Figure 6. Homicide in Bedfordshire's local authorities. Using community safety data from ONS 2023. (Graph produced by Reuben Johnson, PhD Student)

Using Office for National Statistics data (ONS, 2023), the tables above display the total police recorded crime rates for the three boroughs of Bedfordshire between the year ending March 2021 and March 2023. The figures exclude fraud and unassigned crimes in total recorded crime numbers. These tables confirm reductions in overall reported crime across the three boroughs over the last two years but with increasing trends over the last year. In cases of violence against the person, recorded increases are shown in all three boroughs over the last two years. As with all official statistics, the figures above may represent as much about responses to crime as the crimes themselves and may indicate proactive work by the drug teams of Bedfordshire police (see Operation Costello below). The hidden or dark figure of crime is likely much higher for most crimes as not all crime is reported or detected. According to Buil-Gill et al. (2022) of CREST analytics:

> *The percentage of crimes unknown to the police can be as large as 67% for damage, 63% for personal property offences and 61% for threats. Crime reporting also varies across population groups, and recording practices differ between police forces, with a 2014 inspection concluding that between 63 and 71% of violent incidents and 71 and 77% of sexual crimes reported to the police were not correctly recorded in crime registers.*

These figures include all police recorded violence numbers; these numbers are not disaggregated for gang-related or drug-related violence as these crime associations are not routinely flagged but may be worth considering further. The degree of stability in an illicit market tends to shape levels of violence, with increasing stability leading to less violence, with violence avoidance being the preferred option of upper-level market operators (Pearson & Hobbs, 2001: Schneider, 2013). It is suggested that enforcement in neighbourhood drug markets can provide temporary respite for affected communities through targeted deterrence (Caulkins & Reuter, 2008).

Bedfordshire police should routinely flag gang-related and drug-related violence to analyse illegal drug market stability. This could inform targeted interventions aimed at preventing violence.

However, the inaccuracies flagged above are not the case for homicide figures, which are considered accurate (ONS 2023). Figure 6 shows increases in homicide in both Luton and Central Beds. The figures do not indicate the context of the murders, but these calamitous crimes bring devastation to affected families and communities and also have significant fiscal implications, impacting overstretched and poorly resourced public services. Heeks et al. (2018) equate the unit cost of homicide to £3,217,740 in 2016. Utilising these estimates, these crimes cost the public services of Bedfordshire around £9,653,220.

Partnerships should consider investment in appropriate preventative services to reduce severe violence and homicide (suggestions for preventative interventions are discussed below).

County Lines in Bedfordshire

ERSOU has responsibility for disrupting organised crime and counter-terrorism and is supported by the seven police forces in the Eastern Region and led by Bedfordshire Police. According to an inspection report by His Majesty's Inspectorate of Fire and Rescue Services (HMIFRS, 2023), ERSOU is rated good at tackling serious and organised crime. Moreover, Bedfordshire Police is reported to understand national and local organised crime threats well.

The 2020/21 National County Lines Coordinating Centre strategic assessment (NCLCC, 2021) reported that roughly 600 county line deal lines are operational nationally in any given month, which is viewed to be a consistent number over several years. From the figures illustrated on the dashboards below, the number of lines submitted by Bedfordshire police to ERSOU fluctuates depending on police activity and data selected for returns in any given year.

The recording of County Line activity is relatively new, and few detailed statistics are currently published (Havard, 2022). Intelligence and information sharing are a vital part of policing interventions towards disrupting gangs, and this usually takes place at three broad levels. Data collection processes are outlined in the HMIFRS Inspection Report of the National Crime Agency (2022). Every month, local police forces compile County Line drug dealing data and send it to the region. Analysts check the data for accuracy and add relevant information from intelligence sources. This is then sent to the NCLICC, where further checks occur, and intelligence is added to create regional intelligence reports, which are sent back to the region. Representatives of regional teams also attend monthly local threat assessment meetings and send quarterly threat assessment reports to local police forces. The process is timely and laborious due to the lack of cross-border information systems, which is reported as a major weakness (HMIFRS 2022).

Nationally, we recommend that the NCA engage relevant experts in cybersecurity to research and assess the possibilities and projected costs for integrated and automated systems for managing intelligence for cross-border criminal activities.

Analytic inputs and overviews will depend on qualitative assessments from police officers and analysts who input quantitative data and score risk. Therefore, the available figures must be consistent in assessing risk and impact across police forces and regions. However, assessments such as individuals' roles in County Lines can vary, particularly in identifying line holders. A recent inspection report of ERSOU (HMIFRS, 2023) highlights the need for improved consistency in making assessments of risk using the Management of Risk in Law Enforcement process (MoRiL). Analytical products are reported to be utilised well by Bedfordshire Police to understand threats (HMIFRS 2023).

The following infographics summarise an overview of County Lines in Bedfordshire data from 2019–2022.

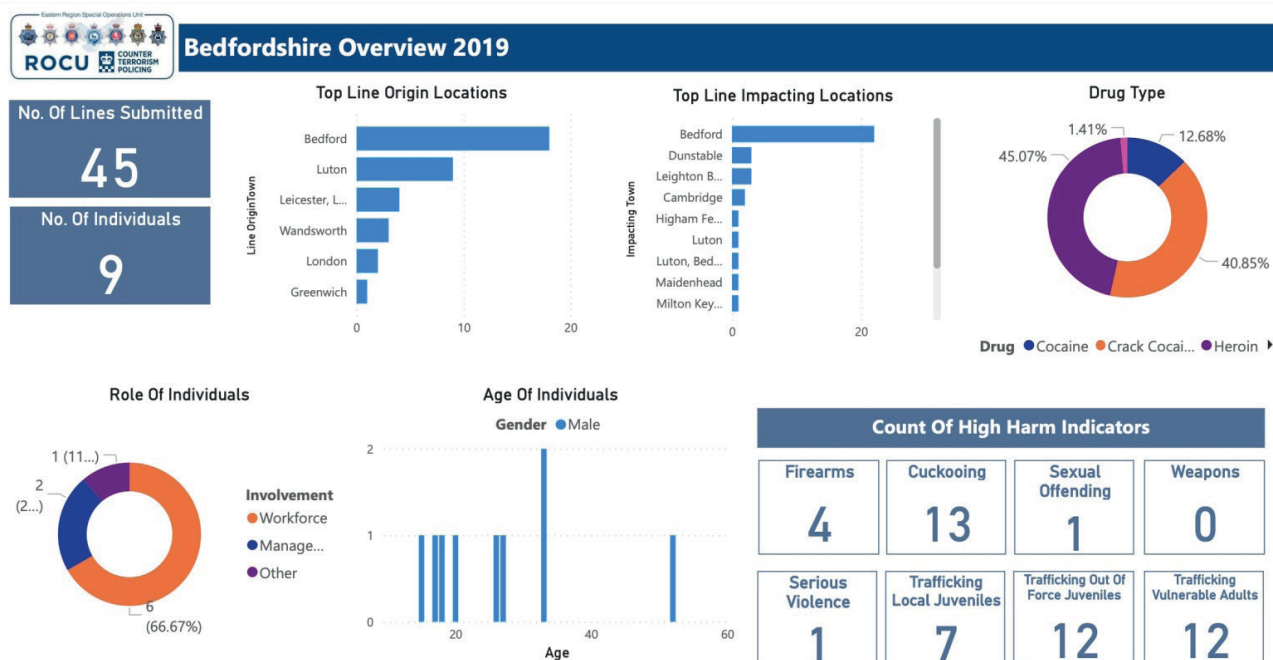**Figure 7. Overview of County Lines Activities 2019**

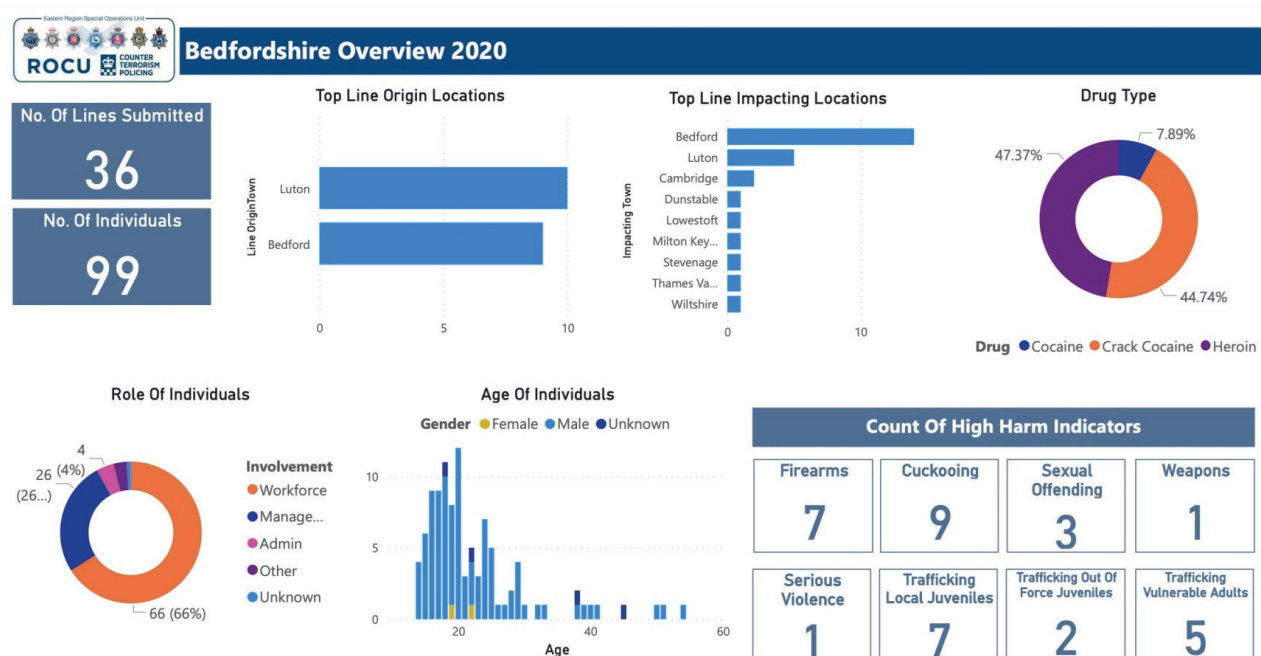**Figure 8. Overview of County Lines Activities 2020**

Figure 9. Overview of County Lines Activities 2021

Figure 10. Overview of County Lines Activities 2022

The main sites of origin and impact for County Lines drug distribution appear to be consistently apparent in the largest built-up areas of Bedfordshire. Those involved are primarily male, and the age demographic of involvement appears to be bifurcating over time, with increasing activity simultaneously demonstrated by both younger and older age groups. This may be explained by the targeting and criminal exploitation of younger children unknown to the criminal justice system and older, possibly drug-dependent individuals, similar to our findings in other sites. Regarding high harms, the cuckooing (taking over residences for drug sales) is reportedly decreasing. The number of reported weapons appears to be consistently present but does not include firearms recorded elsewhere. The trafficking of local Juveniles appears to have increased over the four years of data. There are increases in the recorded numbers of people involved, reflecting numbers in data returns and police activity. As stated above, over 400 victims of modern slavery were identified in Bedfordshire last year (2022). Whilst this figure is likely to include all forms of modern slavery, the returns shown in Figure 10 for 2022 indicate a County Lines workforce of just 121 (County Lines, n=65 and unknown, n=56), a total which appears to be less than expected. The infographics also show that fewer lines originate from London. This could be a reporting artefact or reflect local franchising arrangements, with local networks increasing replication of the County Lines model and may be worth further consideration (see below).

Local County Lines returns for numbers involved in the workforce should be scrutinised further to ascertain any reporting artefacts or actual changes in the operating model, such as franchising, to the business model.

There appears to be a return to increased impacts in more distant locations after the localisation of activities shown in 2020. This will likely reflect market adaptations to "lockdowns" during the COVID-19 epidemic. To briefly summarise the national context, the pandemic fully emerged in the UK in February 2020. The first UK national lockdown started in March 2020 and lasted for over three months. From March 2020 to March 2021, lockdown measures significantly curtailed non-essential contact and travel. As expected, this resulted in changes in the modus operandi of sellers and users involved in County Lines drug markets. According to a national survey of 2621 drug purchasers conducted by Release (Aldridge et al. 2021), most did not have difficulty finding a supplier or a desired drug at the start of the pandemic. However, some difficulties were experienced as the first national lockdown eased because of supply shortages. Prices went up while the purity of the drugs remained the same. A research briefing from the University of Nottingham suggests that during the lockdown, due to increased visibility of those involved in County Lines, the rail network was utilised less in favour of car hire to travel to "out of town"destinations and more local children were used in the re-supply of drugs, or to collect money (Brewster et al. 2021). Both police and youth workers mentioned changes pre and post-COVID regarding the demographics of those involved in County Lines and geographic areas of County Lines activities. They mentioned that younger, more affluent children and older vulnerable adults are increasingly been drawn into drug distribution locally some through involvement with serving prisoners.

One respondent said:

> So the County Line model from our perspective has changed, and it's far closer; you're not seeing it being punted all the way out to the local seaside towns where there's not much market. They're keeping it fairly local. So, Luton to Stevenage, is what, 30 minutes? 40 minutes, Luton to Northampton or Northants is about an hour and a bit. So not significant distances, but we also know that they've got associates and links within those areas, and we were able to trace them back from people released from prison.

The role of prisons acting as a focus and "multiplier" for exploitation linked to County Lines is discussed in detail in our HMPPS report, which provides a series of recommendations.

Therefore, County Lines activities in prisons should be addressed as a priority.

One youth worker confirmed some of the recent demographic changes. They said:

> *Since COVID a lot of things things have happened. Talking about the young people that live in Luton, in the community, there's been a lot of increase in terms of young people getting involved in the serious youth violence, the gang thing bubbling, and you know, that's been quite high. What we see is the young ones, as in age from 11-12, who are—getting groomed into this sort of culture, and it's quite scary, and some of the young people come from good backgrounds. And they just get dragged in. Not the fact that they're getting directly groomed. It's just that some of them, the scary part was they wanted that sort of culture.* (LY 2)

Pitts (2012) warns that in an age of social media, the pressure to belong and be viewed by peers as someone with a reputation, however negative, is a dangerous pathway. Some young people are drawn to the "glamour" of drug dealing and what some may view as a "respected" subculture of gangsterism. He suggests:

Given their origins in the entertainment industry (Hagedorn, 2008) the styles and social practices that gang members absorb from globalised 'gangsta' culture tend to be preposterous caricatures of human behaviour. This means that affiliates are destined always to be 'wannabees', aspiring, and urged on by peers, to achieve ways of being which are unattainable. But, as Cristia Emini (2011) notes, 'wannabees' are the most dangerous kind of gang affiliates because they will do anything in their attempts to be accepted as the 'real thing'.

The use of more localised young people and adult criminal exploitation in Bedfordshire was also confirmed by a police respondent who said:

> *They're just not going missing for that kind of length of time. They're just doing far more travelling...we're not seeing kids going missing for weeks. It's a far shorter process, and it doesn't mean they're not working for that same period. They're just not going missing for that length of time ...It's a combination of using locals; the use of children has decreased, and police interest seems to be a deterrent. So they can reduce the risk to themselves by using a local drug user ... if it means less police interference, you know, it's just weighing up which one you wanna go with.* (Pol 1)

The current difficulties of assessment of vulnerability have been commented upon above. However, understanding and assessment may prove even more complex with the changing demographic described above. For the younger and sometimes more affluent demographic, age is an important consideration in being drawn into the gangster culture. However, respondents also commented on the importance of considering the cultural dynamics of power, which are not typical in assessing individual vulnerability or susceptibility. They said:

> *In many of this current stuff, these are kids whose families have got means. So this is just, you know, currency and business and power at the end of the day, they see it works because it's worked for uncle such and such. And I want a Land Rover at 18 and rolling around the town, you know, so it has, it's subtly shifted. Culturally, that's the bit that needs to be looked at. As a community, is that OK? You know, they're they're not poor.* (LP 1)

The intersections of culture and gender also play an important role in exploitation. One respondent spoke specifically about South Asian women. They said:

A lot of women of various ages are victims but not treated like victims. If they're in the same home as, the partner or boyfriend, they are seen as part of the problem and not the victim. They are coerced to carry stuff. You know, it's a firearm or being in the same room or building as a partner that's doing this stuff, whether they genuinely are aware or not aware… What I'm seeing more in the Asian community is that they are coerced into taking the blame by the men in the families. (ARE 2)

From the above figures, the reports of high-harm sexual offending appear to be anomalous, contrasting with the general national reporting rates, which have increased over the last decade. The latest national figure for reporting sexual offences is 31% higher than the year ending March 2021 and 19% higher than the year ending March 2020 (ONS 2023). This anomaly may be due to sample size because "high harm" assessment processes only apply to the most serious offenders, and fewer cases would be assessed. Moreover, associated victims may not report sexual harm through fear or lack of trust. Pitts et al. (2017), in their report on Preventing Organised Crime, Suggest:

While a small number of upper-echelon Organised Crime Group (OCG) nominals lived in comparative opulence, most were located in low-income, high-crime neighbourhoods, in which there was a tradition of organised criminality and violence. Their families were characterised by high levels of domestic violence.

Cox (2015), in her study of co-occurrence and re-victimisation of sexual assault and domestic violence, argues:

Intimate Partner Sexual Violence (IPSV) generally occurs in the context of other forms of violence and was often part of a larger pattern of coercive control in a relationship.

Moreover, Firmin (2018), highlights the imperative of responses to child sexual exploitation (CSE) for gang-associated girls and young women.

To provide further opportunities for safeguarding, we recommend that ERSOU assist local Borough Command Units (BCUs) in reviewing reporting processes and returns to the NCLCC. Particular attention should be paid to assessing sexual offending and domestic violence connected with high-harm individuals and gangs to obtain a consistent and accurate picture of gang-involved and gang-affected young women and girls.

Drug Supply, Middle Markets and Moves Towards Monopolisation

Dame Carol Black's report (2020) suggests that homicides and other forms of violence originating from County Lines and other illicit markets have recently emerged as a significant criminal justice issue in the UK, with fifty per cent of homicides associated with drug distribution. A 2019 Drug Survey by Bedfordshire police indicated that drugs were the principal driver of serious violence in the County. Heroin and crack cocaine were the primary commodities trafficked via County Lines in Bedfordshire, although other "party drugs", illegal pharmaceutical drugs and cannabis edibles were also said to be available. In Bedfordshire, street gangs competition is fierce in a crowded market. One respondent said:

> *The competition is so fierce I don't think that they (individual gangs) are providing the huge amounts of products that we were seeing previously.* (BP 1).

The illicit drugs business in Luton has had detrimental effects on perceptions of safety. A respondent relatively new to Luton said:

> *You see people like in cars parked up in certain areas at random times, and then you see the users, you know, kind of gathering around and you see the kids running When you go into. Town, you see a lot of users, they tend to scare me anyways when you come to night time because anything can happen. So I just tend to stay away from that area during the nighttime. So I just get a cab. So, I tend to work early in the mornings. Even to get into town, I tend just to take cabs. Just to be safe, always expensive.* (LYP 5).

They went on to describe the impact that these partially 'open' drug markets have on visitors to Luton:

> *Because it's at the heart of Luton and it's like right next to the train station, people are coming in, and they see it, and it's like OK! Especially when it's the first thing you see straight when you come in. And you will always see someone next to Starbucks. Whether that's a user or let's say, a homeless person. And that's the first thing you see because you've not gone into town yet. It's literally just as soon as you come out of the station. And it's like, should I be expecting more or is this normal? I mean, there are always users everywhere, not going to say otherwise. Yeah, but when you just see it as soon as you step into Luton...It's like, what else should I be expecting?*
>
> (LYP 2)

Recent national data indicates an increase in drug-related deaths. Drug-related deaths have been increasing over the past decade. The reasons behind this are complex and differ by drug type. The overall trend is driven primarily by opiates like cocaine. Rates of deaths involving heroin or morphine have also been increasing, although the number of new heroin and morphine users has fallen. This indicates higher death rates among existing long-term drug users. Almost half of all drug poisonings continue to involve an opiate, and respondents indicate new risks from synthetic opioids such as Fentanyl and Protonitazene.

The risks to particular groups in the secure estate and on leaving prison are discussed in the accompanying HMPPS site report, which examines the evidence supporting Opioid Replacement Therapies (ORTs) and injectable opioid treatments (IOTs) of diamorphine (heroin) to reduce risks for entrenched users (Department of Health, 2017).

Recent concerns have been expressed in the Eastern Region regarding the supply of a synthetic opioid, etonitazene, similar to fentanyl, after the deaths of two people in Essex (ITV X 2023). Etonitazene has a similar or higher toxicity to fentanyl (a potent synthetic opioid) and is added to illicit drugs like heroin to enhance their potency. Police and drug agencies have issued warnings to drug users regarding "nitazenes" reporting that they have recently been found mixed with heroin, with some sold as illicit oxycodone pills or Xanax powders. Nitazenes can be at least as strong as fentanyl and can be hundreds of times more potent than heroin. They are known to have led to overdoses and deaths in several areas across the UK (Turning Point 2023) despite the availability of Naloxone, an opioid antagonist that rapidly reverses an opioid overdose. Opiate addictions are usually treated with Opioid Replacement Therapies (ORTs), usually in the form of prescribed methadone and sometimes buprenorphine. Slow-release oral morphine is also reported to be effective in the case of patients who cannot tolerate usual ORTs. Evidence suggests that injectable opioid treatments (IOTs) of diamorphine (heroin) can greatly assist those who fail to make progress with other interventions to reduce risks (UK Guidelines on Clinical Management, 2017). A community-based pilot IOT project in Middlesborough, was commended at the Drugs Home Affairs Committee (2023). It is recognised that the upfront costs of such interventions appear high, but evaluative research undertaken by Byford (et al. 2013) points to longer-term cost-effectiveness. A police respondent agreed that current enforcement approaches to drugs were of limited utility and supported a change of approach. They said:

> *OK, so here we are, and you've got legislation from, was it, 1973 so great, well done, that's only 40 years old. And then we've then got the idea that we've been policing or not even policing drugs, which have been part of culture and society since man first started it. And then you've got the age-old argument that some drugs are OK other drugs aren't. Yes, go out and get smashed on a Friday, or Saturday night. But don't take these other drugs, please. It just doesn't wash with me in any way, shape or form. So if we can tax alcohol and send that back into, you know, healthcare and rehabilitation, why can't we do it with drugs and education, uh, from an ex-user, he talks about drug replacement therapy, and you can have this injection... It's the biggest drain on police resourcing.* (BP 1).

We recommend injectable opioid-assisted therapy across Bedfordshire to reduce harm and isolate the drug market from the criminal fraternity.

It is suggested that enforcement crackdowns in drug markets can also have unintended consequences for market stability (Mayhar & Dixon,1999). Schnider (2013) argues that increased violence can emerge in unstable drug markets. He further suggests violence is most likely to emanate from middle managers of the market, who utilise violence to control the distribution workforce and build brutish reputations, which can increase their status and opportunities for 'promotion' in the drugs business.

Several civil orders are available to assist with the disruption of such violence (see Appendix 3). The main civil orders are Slavery & Trafficking Prevention Orders (STPOs) and Slavery and Trafficking Risk Orders (STROs), which enable courts to restrict the activities of individuals believed to be at risk of, or perpetrating, modern slavery offending. Moreover, individuals' reputational capital, which enhances status (Andell 2017) may also be affected by such orders as they may be viewed as modern slavers rather than 'Robin Hood' type figures. However, one respondent said the orders were useful but could be difficult to obtain.

The National County Lines Coordination Centre (NCLCC) 'Orders Team' assist and advise on the appropriate use and application for these orders. The Orders Team reviews investigations and advises

on charging for modern slavery offences. Appropriate application of Prevention and Risk Orders appears to be a promising way to reduce harm. They should be applied to deter offenders deemed to be a risk of exploiting others. However, considerations for the review of orders should also apply to enable offenders to assume new identities following rehabilitative processes.

Enforcement agencies should prioritise actions against those who control the drug supply workforce. Appropriate civil orders should be sought to target these offenders. These actions should be utilised as a "signalling event" to send a deterrent message to the broader drug supply network and deter further exploitation (see Appendix 3).

The dominant gangs in Luton appear to have reduced the number of county lines coming into the county, adopting the same business model for their drug supply networks to export drugs to neighbouring counties, where there is said to be little conflict, which may indicate a settled market. This may be due to better organisation and shifts towards monopolisation with fewer large suppliers and franchising of a brand between groups that were once in competition.

An estimated 34,000 illicit drug users were in the county in 2019, which has probably grown since then (Black, 2020). This represented 9% of the population of the County aged between 16 and 59 years old. The annual amount spent by users on Cocaine in the county was estimated to be between £1.6 million and £53.8 million, while the figure for cannabis was an estimated £59 million. Vulnerable drug users are subject to financial and sexual exploitation and cuckooing, and there appears to be a strong link between mental health conditions and drug misuse, with alcohol dependence and adolescent drug use as crucial factors.

The major drug markets in Bedfordshire are in Luton, some of which have direct links to drug importation and locally established organised crime groups that deal drugs across the County and markets in the UK. The Luton drugs market is controlled by British-Asian Organised Crime Groups (OCGs) but has a national reach with an identified customer base in London, Birmingham, Slough and Crawley, although it is suspected that it stretches further than this (Eastern Region Strategic Assessment of Serious and Organised Crime, 2018, p.42). A recent covert Policing operation targeting drug supplies identified six unique deal lines with 2,418 individual phone numbers in contact with the deal lines. Albanian OCGs also have a significant share of the cocaine market in the Eastern region. They are seen in all force areas in the region" (Eastern Region Strategic Assessment of Serious and Organised Crime, 2018, p.42). Whilst the realities of access to global drug markets by particular ethnic groups through social and economic factors connecting with history and geopolitics cannot be ignored, the responses to the association of ethnicity and crime compound the stigmatisation of particular communities and neighbourhoods. As Wacquant (2007) explains:

> *A blemish of place is thus superimposed on the already existing stigmata traditionally associated with poverty and ethnic origin or post-colonial immigrant status.*

Bedfordshire has a successful track record of utilising public health messages therefore, building on this success, we recommend a strong public health campaign to counter the stigma of relatively poor white and racialised neighbourhoods and to encourage communities to come forward and speak to statutory services about concerns regarding drugs and drug markets.

A report by Hall, Khan and Eslea (2022) suggests that County Lines Gangs may target universities for criminal exploitation. They argue:

News reports prior to the March 2020 lockdown suggest that warnings have been made for several years about County Lines groups targeting university students, as this provides a legitimate reason for why they have moved to a new particular area. University students can then be used as 'runners' to transport and sell drugs, to recruit other students, and their student accommodation can be 'cuckooed' and used as a base to store, and sell drugs from.

Bedfordshire University may also play a role in the illicit drugs business; a reported tactic is that of "known gang members, some of whom are ex-students, targeting new students at the start of the academic year to deal drugs to" (Bedfordshire Police Serious & Organised Crime Local Profile, 2018, p.28). Anecdotal information suggests some drug dealers may be sent to enrol on courses with no intention of completing them to exploit the new market share of users whilst utilising student loans as initial capital to source bulk commodities.

A local drugs survey noted that drug markets were evolving in response to supply and demand economics. Younger children were increasingly involved in drug dealing, triggering a surge in drug-related gang violence. The emergence of new psychoactive substances, the increased potency of cannabis and high-purity substances, such as cocaine, were becoming normalised for recreational use, and drug dealers were becoming more blatant with little apparent concern for the consequences of their actions.

National Guidance requires the establishment of a Combatting Drugs Partnership (National Drugs Action Plan 2021). At the time of writing, this partnership was not evident to respondents in Bedfordshire.

A strategic approach to reducing harm from drug markets includes supply and demand reduction strategies consisting of actions relating to enforcement, situational prevention, social interventions and treatment and community involvement (McManus and Andell, 2002). Such approaches should be coordinated alongside the activities from other strategies and delivered with a localised focus to prevent dissipation of efforts and a "scatter gun" effect (see Strategic Tool in Appendix 4).

Street Gang Evolution

A respondent informed us that:

The primary street gangs of concern were a Bedford gang, which operates in the Queens Park and Town Centre areas of Bedford, and a gang in the village of Clifton. Of the five significant street gangs in Luton, the Hart Lane Savages operate in the Stopsley area of the town, OBK operates in the Lewsey Farm and Leagrave areas, ARG operates in the Runley Road area, Kingsway Park Gang operate in the Kingsway Park area, Marsh Farm gang operate in the Marsh Farm area. (BA 1)

Some of these gangs have operated for at least two generations. A young person talked about the gangs of Luton in the following terms. He said:

Luton's not very good place to be honest, just stuff that happens like all the gangs business there's a lot of gang business there's probably about four. Yeah they're the main ones probably just go to their own postcodes so one doesn't go into the next or something will happen... Yeah, it's been like that well since I was in high school for years really. I know some guys that are about 40 years old. They have been in gangs for years. My dad was in the Lewsey Farm one. (YP L2)

Cross-over and collaborations at the lower end of the drug supply network between emergent street gangs and embedded gangs or OCGs were commented upon by a respondent who said:

> My view is that with the street gangs, there is definitely a cross over there, and from our experience, local street gangs are probably feeding into organised crime groups in a number of ways...they are pulling the strings of the smaller groups, I think that in Bedford, in particular, there are a number of smaller groups of young people that like to call themselves gangs that do a bit of dealing a bit of dabbling, but they very quickly can be consumed by the larger players out there. (B YS1)

Another respondent from a specialist policing team mentioned the progressions of some gang members into organised crime. They said:

> You're always going to see changes in the individuals because, you know, people progress through the ranks of a gang or within that culture, and their roles change. (SC 1)

Another said:

> I appreciate that these organised crime groups will diversify in any which way they can to make money, so in my personal experience if they are using children for county lines and those lines are disrupted, there needs to be an intervention to protect those children because they will diversify in other ways to ensure that they make money. (OCM 1)

The National Crime Agency (NCA) estimated that there were 4,772 OCGs in the UK in April 2020 (NCA 2020). A quarter of these groups (around 1,200) were estimated to be involved in violent criminal activity. In 2022, Bedfordshire police 'mapped' 47 organised crime groups operating in the County, ten gangs, with 19 County lines coming into the County. All mapped Organised Crime Groups (OCGs) in the County linked to firearms were also linked to drug supply. This supports a previous Home Office national estimate of a 70% to 80% link between drugs and firearms discharges.

The Government's Organised Crime Strategy (2013) distinguishes between gangs and OCGs but recognises that gangs can evolve into OCGs. Ideas of organised crime are contested, and recent research suggests they may be looser fragmented networks rather than rigid hierarchical structures. Varese (2020) argues that organised crime groups are best defined based on activities rather than organisational structure. In his analysis, he cites the development of some street gangs that have evolved into organised crime groups with international reach.

Drug supply emanating from Bedfordshire is regionally and nationally significant, with gangs inextricably connected across the national Organised Crime Group (OCG) network. ERSOU (2023) recently publicised the conviction of an OCG based in Luton for its role in criminal networks, selling and distributing cocaine and heroin. The reach of organised crime connected to Bedford sometimes extends beyond national borders, one respondent mentioned the involvement of some Albanian nationals, they said:

> If you've got young Albanian males that are coming across, they don't have the means to pay for their crossing. Then they're going to work their debt off, either in a cannabis factory or in, you know, supplying Class A drugs to work off their debt. I mean, in Luton the other day. I think there was about. Three or four cannabis factories that were discovered there were just in one day that were connected or suspected to be connected to Albanians. Whereas that sort

of footprint has moved it used to be exclusively Vietnamese, didn't it? But I think the Albanian influence, and I can only speak for the what we see across the region, certainly in Luton and Bedfordshire, is quite significant now. (R1)

Bedfordshire police have been effective in enforcement operations against gangs and organised crime groups. According to Bedfordshire Police (2023), Operation Costello was launched in the Spring of 2020 as their biggest-ever operation to tackle serious and organised crime across the county. Operation Costello claims 119 arrests, with 36 people jailed for 258 years. Almost 20 kilos of Class A drugs and 64 kilos of cannabis have been seized, with more than £3 million in criminal assets being investigated. The operation was initiated following Operation Venetic, an international enforcement intervention to dismantle encrypted criminal communications via EncroChat. Bedfordshire was particularly impacted by intelligence gathered as part of this operation, and in June 2023 the government awarded additional funding of £6.3 million to combat drugs, violence, exploitation and organised crime in Bedfordshire.

The Bowson team is Bedfordshire's guns and gangs team comprising specialist dedicated officers. It is reported that the unit has taken 47 illegal firearms off the streets, arrested 833 people and seen 183 offenders jailed for 621 years.

The Bowson team are also heavily involved in partnership safeguarding and protecting young people from violence and exploitation, including chairing the county's Multi-Agency Gang Panel (MAGPan) and Serious Youth Violence panels. In addition, Bedfordshire's Violence and Exploitation Reduction Unit (VERU), which works directly with young people at risk, has since 2019, received £4.05 million from the government, with the force getting £3.4 million of funding over the same time frame for further enforcement activity to tackle serious youth violence.

Division of labour in drugs supply may be fluid in Bedfordshire with collaborations between prominent OCG's Bedfordshire exporters and connections with established "Urban Street Gangs" and less established Street Gangs in terms of, but these arrangements are essential to understanding if enforcement is to be intelligence-led.

Enforcement agencies often utilise a functional "tripartite" model for tactical and strategic convenience to demarcate international, regional and local market divisions of labour in drug distribution networks, which assists in managing risks and resources (Chin, 2009). However, Sergi (2017) indicates that it is likely that this tripartite model is imperfect and cannot encompass all of the characteristics of any one particular case. She argues:

Whether a group is local, national or international affects policing responses because location/ geography combined with the level of sophistication of the group will weigh differently on risk and harm assessments to determine the seriousness of the threat. In the local dimension, organised crime groups and gangs may overlap.

We were informed of the possibility of new collaborations between different gangs and commodity brokers when dealing outside of Bedfordshire as it was reported that some phone lines are now switched off on certain days to allow dealing from other lines in collaboration rather than competition which suggests greater organisation. A respondent said:

So you know your three dealers are out buying their one product from xxxx and or and they're buying that in bulk because and then sharing that product out, they are then able to get a

discount. They're buying it in bulk from the guy above; potentially they could then say you know you're dealing Monday. I'm dealing Wednesday. You're dealing Friday. So and so forth and share out the days that way (BP 1)

Illegal drug markets can be segmented based on the types of drugs traded, the amounts traded and the reputation of a reliable product. In accompanying site reports, we suggest models of drug distribution which were once common are now subject to change, and much of this change has occurred in what has been termed the middle market. HM Government's 10-year Drug Action Plan, From Harm to Hope (2021), suggests a focus on enforcement interventions at a higher level towards the "middle market" and above. Arguably, the emergence of County lines drug dealing has assisted in embedding a new type of "middle market", sometimes organised through "local organised crime" networks of established gangs with links to national and international drug suppliers which require joined-up partnership interventions encompassing stakeholder involvement at local and regional and national levels (Andell, 2019).

We are informed that Bedfordshire Police map established key gang nominals as they would organised crime nominals. Given some recent evolutions of street gangs, this is a useful practice for investigating SOC networks. One respondent who works in disruption of organised crime said:

I think there's a really good focus on mapping organised crime groups ensuring that we continue disruptions on them to disrupt and dismantle organised crime. (OCM 1)

However, challenges remain in understanding the dimensions of the cross-overs between organised crime and what some respondents call Urban Street Gangs and Street Gangs to request the deployment of appropriate responses. From the reported returns above, it can be seen that there is a decrease in the known number of lines but an increase in the number of known individuals. This may be a reporting artefact but can also be explained by fewer overall numbers of lines importing drugs into Bedfordshire from elsewhere. This may also represent a drift towards embeddedness and monopolisation at the upper end of a regional supply chain and franchising at the mid-level of drug supply. A police respondent mentioned cooperation between different line holders. He said:

We had a very strange set of circumstances where we had one gang running three lines into the same town. It's chaotic in nature anyway, so they're all kind of doing their own kind of thing, but they were travelling together in the car to go up and deal together. It was a very strange set of circumstances because you thought it had been far more sense to compound your business all together into one line and have all your contacts as one line. But no, they just did their own thing separately and then also met up with a local Northampton drug dealer and did the same thing with them and were out dealing together. It was all a bit odd. (BP 1)

Violent crime was said to occur between local street gangs in Bedfordshire but not so much in the target destinations where drugs were transported. These destinations were said to be "friendly" towards incoming dealers from Bedfordshire:

We have a lot of exported lines. We don't have very many imported lines at all. Now from the exported lines that we manage, we're not seeing the groups that are involved are very violent. We have lots of local feuds with local gangs involved in shootings and stabbings that's regular. We're not seeing that translated into the county lines, so. I think that is partly to do with their choosing areas where they already have an affiliation or a link or some association. (BP 1)

Much analysis depends on the scoring of risk using MoRiLE scoring systems which are undertaken by trained nominated scorers in intelligence and analysis. Although scorers have a range of indicators to score against and a moderation process (Home Office 2018), sites in our research adopted different practices in naming, scoring and mapping gangs and OCGs. These Regional differences need to be addressed.

Standard practices for scoring harms should be adopted as part of ongoing Continuous Professional Development (CPD) for Nominated Scorers. Reflective practice sessions or "Advisory Boards" should be facilitated between regions. This process would examine dip-sampled work and case studies similar to the reflective process outlined in Appendix 1.

Evidence suggests that at a practice level, there are good information exchanges regarding the risks to children from criminal exploitation across the three boroughs of Bedfordshire. One respondent commented:

> *We have a biweekly Spock meeting where we discuss high-risk young people and a Bedfordshire-wide meeting, so we have the opportunity to discuss young people that are of concern in Luton Central Beds and Bedford and often, those relationships between the young people that we work with can be significant in terms of supporting the police to map you know associations.* (B1)

However, in terms of a joined-up strategic approach some respondents raised concerns. For example, the Organised Crime Strategy (2013) and National Drugs Action Plan (2021) can attract significant national resources locally. Opportunities exist strategically to consider and coordinate the overlaps between these national strategies for focused local implementation (See Strategic Tool Appendix 4). However, challenges exist in coordinating multi-agency community safety activities between the 3 boroughs of Bedfordshire. One respondent commented:

> *I think we need to push for a much more collaborative approach in Bedfordshire. Beds might come up with a great idea, but Luton council will just ignore it because it's Luton, you know, and likewise, so that would be, for me, one of the biggest barriers we should be making sure we can talk the same language across the local authorities.* (VM 1)

Moreover, in the borough of Luton, a respondent mentioned the lack of a strategic approach to community safety work and that some elected members occasionally influenced policy officer decisions to direct work towards favoured projects. They suggested that some elected members would benefit from fully understanding the importance of an independent community safety role to assist with honest brokerage for multi-agency work:

> *It looks good on paper, but actually, as soon as you just even scratch the surface there's nothing there and it wasn't laziness, because that would be really rude to describe my colleagues as lazy But what it was, you know, was priorities elsewhere… you tend to just get drawn along by Councillors whims. And you know sort of placating and pleasing them.* (PO1)

Luton Borough had no dedicated Community Safety role, and strategic community safety activity was subsumed within other policy roles. One respondent spoke about the efforts to obtain a dedicated Community Safety Partnership (CSP) resource. They said:

> *Yeah, we're very early days with that. These conversations take an awfully long time, in my experience. You know (we are meant to), meet quarterly, effectively, but we don't. We don't even*

have a resource, and that's something you should be aware of at the moment. I've just come off a conversation with the PCC... I basically said, you know we haven't got a manager who holds this. So it's my director and myself, basically make it happen somehow and the theme leads, but there's nobody actually holding the ring because we don't have a CSP manager or anything like that. I know, frightening...We need a senior manager. Who's dedicated to the world of CSP sitting in our unit. (LCS 1)

It is recommended that a dedicated Community Safety Role be created in Luton Borough to provide honest brokerage in reviewing current strategies and align national priorities with local needs.

Responses to Gangs

Operation Costello

As noted above, launched in Spring 2020, Operation Costello is Bedfordshire Police's largest operation to tackle serious and organised crime across the county. It was launched after Operation Venetic, a huge international law enforcement campaign to dismantle encrypted communications called EncroChat, used exclusively by criminals. Bedfordshire was exceptionally impacted by intelligence gathered as part of this operation, and the government subsequently awarded additional special grant funding to help the force's response.

The VERU

The Bedfordshire Violence and Exploitation Reduction Unit (VERU) provides and commissions a network of different agencies and groups which aims to prevent young people from becoming involved in aspects of gang criminality and exploitation and seeks to tackle gang membership to reduce violence amongst the under 25's. The VERU belongs to a different governance structure to Local Authority Youth and Community Services, being closely aligned to the Police and Crime Commissioner of Bedfordshire with performance indicators set and monitored by the Home Office.

In 2019, the Home Office allocated funding to 18 police areas to establish (or build upon existing) Violence Reduction Units (VRUs) as part of the Serious Violence Fund. VRU's aim was to lead and coordinate a preventative, whole-system approach to violence reduction, which comprises:

- multi-agency working
- data sharing and analysis
- engaging young people and communities
- commissioning (and delivering) evidence-based interventions.

According to a Home Office national evaluation of VERUs conducted in 2022, there were no statistically significant impacts on the primary serious violence outcomes of reductions in hospital admissions for sharp object violent injury or homicides. Locally, the reported statistics show increasing "Violence Against the Person" trends in Bedfordshire, but these statistics were not disaggregated by age and under 25 statistics were not available at the time of writing. However, despite some reported initial duplications of work with other youth services, the VERU was thought to engage young people and communities effectively.

One of the Home Office aims for the VERU is coordinating violence reduction efforts. Effective multi-agency work often depends upon building trust from involved stakeholders, and coordination of this work depends upon both good governance and active citizenship. The VERU's engagement work model is beginning to be embedded in communities across Bedfordshire, and they have creative potential for influencing violence reduction work across the three boroughs from grass-roots organisations upwards. Evidence also suggests that community development strategies can improve community relations and reduce violence (Durham 1972; Bragga 2008). Locally, this approach is being encouraged. The CEO of the VERU observed that:

The VERU Village has been established to house a collection of supportive, early intervention and diversionary hubs across Bedfordshire. Hubs which support countywide activities and initiatives designed to tackle serious youth violence and CCE. We have created these HUB/HUTs to ensure that support and guidance can be easily accessible by our Bedfordshire residents and practitioners alike (Kimberly Lamb - Presentation Slides).

Across Bedfordshire, there appears to be an appetite for devolved neighbourhood-focused work. Several respondents discussed the "Tree Project" as a neighbourhood-focused multi-agency youth initiative. One said:

We do have youth provisions available in certain areas, and I know the Youth Services providers meet monthly to look at what's on offer and the gaps. We have given some money to youth offending service for the tree project to reduce indents in exploitation. We looked at hospital data and then got a group of professionals together Luton actually commenced it and then allowed Bedford Borough and Central Beds to copy the idea it's a project taking it back to that old school outreach youth work so we've got police officers youth workers children services workers community safety local exploitation charity housing ETC putting themselves forward to do a shift if you like from sort of two till eight or three till 9 whatever the times are in areas where there's concerns for exploitation ...there are some pockets of really good work but again we could do more because I would like to see youth clubs open every night. (PO1).

MAGpan and The Tree Project

Clearly, Luton's Youth Offending Service Multi Agency Gangs Panel (MAGPan) has been struggling with gang-related drug dealing for some time. In its Youth Justice Plan 2022/23 (Serious Violence) it notes that MAGPan exists to co-ordinate appropriate, intelligence-led and evidence-based multi-agency partnership interventions with individuals who are involved in, at risk of involvement in or directly affected by serious violence and gang-related activity in the Town.

MAGPan was originally developed as a response to the large numbers of young people in 2015/16 coming into the justice system for the first time as a result of serious offending, many of whom received a custodial sentence for first offences. Why this was happening at this time was not explained, although it seems likely that these 'Clean Skin were being recruited into gang-related drug dealing. The original idea of MAGPan was developed to provide a forum for earlier intervention. However, throughout 2016 the MAGPan was inundated with referrals, and it was very clear that over three-quarters of the MAGPan cohort did not have a 'significant footprint' with statutory agencies yet were already linked to criminal exploitation and involved in gang-associated behaviour. A subsequent in-depth analysis of the initial cohorts demonstrated conclusively that the impact of austerity had affected the support available for children and young people in the town.

The report notes that:

> *'The critical issue with young people who carry knives is how they are drawn into criminal exploitation through social, economic factors linked to lack of opportunities, a lack of resilience within the home or in parenting or other unmet health needs.'*

The report lists a variety of initiatives which are presumably designed to remedy or ameliorate this constellation of 'risk factors' amongst which are the Behaviour, Inclusion and Wellbeing Strategy recommended by the 0–19 Behaviour Review (2016), which 'aligns' with the Education Strategy 2020, the SEND Strategy 2020, the Children and Young People in Town Guidance 2021, the Vision and Practice framework and the Vision for the Town 2020-2040 which is concerned with refurbishing the dilapidated built environment. The report also notes that it also echoes Contextual Safeguarding.

Since 2020, the Home Office has funded a Violence and Exploitation Reduction Unit.

The partnership receives funding from the VERU to deliver innovative pieces of intervention across cohorts of young people vulnerable to exploitation and serious violence.

The report notes that the Amber Unit, an innovative team working in collaboration with statutory and non-statutory partners as part of the Serious Violence Strategy, consists of dedicated Targeted Youth Workers with Community Colleagues; the team works to engage young people who may be showing the early signs of criminal exploitation or becoming involved in anti-social behaviour. It maintains that:

> *' ... being co-located within the same building within a multi-agency environment means that earlier assessment of the needs of a young person at risk can be met immediately by a team of specialists to deliver intervention. Turning strategic goals into operational goals Amber maintains regular contact with schools in the area, responding to concerns from the school concerning possible tensions and in some cases providing restorative justice in schools to 'nip' incidents in the bud. Amber maintains regular engagement with the community and the local community leaders to improve the confidence within communities and build resilience.'*

Since the original lockdown during the pandemic, along with the other members of the Targeted Youth Service, the Amber Unit has delivered group work to targeted individuals at risk of exploitation and criminality in the community. Their early work involved joint patrols with the police of areas where exploitation was apparent, which led to the development of the Tree Project (Tackling, Reducing and Ending Exploitation) and the evolution of that project.

During the lockdown, multi-agency contextual safeguarding processes identified several children who were reported as regularly missing from home or their placements. Many had vulnerabilities that made them targets for exploitation, and some were already being criminally exploited to sell drugs, some were abusing drugs and alcohol and some were already victims of, or at risk, of sexual exploitation. All of them were at risk on the streets exposed to older, more sophisticated offenders. The Tree project that operated in the Town over a 5-month period from February to June 2021 involved 20 specific nights of action funded through an emergency Covid budget. Ultimately devised to safeguard vulnerable children and young people at risk of exploitation that leads to violence in target areas such as Town Centres and areas known for anti-social behaviour, the project had its roots in the ethos of the Operation Staysafe scheme introduced in England in 2008. Acting on intelligence and CCTV, Police Officers, Specialist Workers and Youth Workers in pairs visibly patrolled the areas identified, looking to engage young people in conversation. Built on a partnership between the Police and the Local

Authority, any young person picked up was taken to a designated place of safety where a Children's Services or a youth justice or youth worker carried out a risk and needs assessment there and then. Any further intervention and onward referral were discussed and decided, and children had fast-track access to any and all services commissioned by statutory agencies, VERU or community organisations.

This project involving several statutory and community partnerships allowed other specialist community organisations and support services around Luton to be involved in the nights of action alongside statutory agencies. This direct access to earlier identification, assessment and fast-track intervention has seen young people receiving longer-term support to build the resilience needed to resist exploitation and violence. Health professionals including a nurse and drugs and alcohol workers, were part of the team to offer advice with other specialist community organisations on hand to offer specific guidance on sexual or criminal exploitation and gang-associated behaviour. Community organisations were involved that offered cultural perspectives to engage young people from different ethnic backgrounds and for those who did not have English as a first language. The other part of this project was the regular engagement of these young people in specific areas such as parks. A feature of the Tree Project in Luton was delivering a fixed night of positive activities in a park in a high-offending Ward. This proved successful, with regular attendances of between 40 and 50 children and some parents.

This has led to further community and reparation projects and also taken the fixed night of engagement to other areas where serious violence had recently occurred. This part of the project allowed for a proactive deployment of services in areas where public tension was high and children needed positive activities to engage in. The Tree Project in Luton has been highly successful and many children and young people became involved in positive activities. The visibility of the workers on the project saw a reduction in community tensions following an incident of violence. Whilst the original funding was for 20 nights of action over the 5 months, the Targeted Youth Service and Amber Unit were further funded through core budgets to deliver the park projects throughout the spring and summer months in 2021. Further funding was secured through the Contain Outbreak Management Fund (COMF) to deliver Tree from autumn 2021 to spring 2022 and the VERU and core youth service budgets funded it between summer and autumn 2022. Considering that Tree was originally conceived due to Covid lockdown, its success and continued funding and development is positive.

Dallow Cares

Between November 2020 and May 2021, the Home Office Clear Hold Build (CHB) strategy was piloted in Bradford, West Yorkshire, with several positive outcomes, including a 30% reduction in overall violence. Police at Site 1 committed to piloting CHB as one of eight forces in the second phase of the Home Office initiative.

CHB is an operational framework designed to tackle one or a combination of Serious and Organised Crime (SOC) related threats. It provides a framework, based on a three-phase operating model, which has been designed to tackle simultaneously:

- The threats from Organised Crime Groups (OCGs,
- The local vulnerabilities exploited by them,
- The impact of individual and place-based harm they cause.

Each Phase outlines an operational requirement:

- CLEAR: targets, relentlessly disrupts and removes the OCGs.
- HOLD: consolidates and stabilises by providing countermeasures to stop other OCG members from re-establishing themselves.
- BUILD: seeks to change the community culture, improve the environment, and develop partner agency and stakeholder capabilities.

The initiative sought to encourage a multi-agency, whole-system approach to tackling Serious and Organised Crime (SOC) threats utilising tactics under all four pillars (Pursue, Protect, Prepare and Prevent). Dallow was identified as the pilot site and this was agreed with the borough council.

Gang and Drug-related Crime in Dallow

In June 2021, a 16-year-old member of one local gang was murdered by a rival gang, outside a local High School. This sparked heightened community tensions and retaliatory incidents towards the end of November 2021, which culminated in a significant increase in serious gang violence. Over three months, three GBH offences, two weapons offences, an affray and a robbery were all linked to Dallow Ward gangs. Later, in February 2022, the attempted murder of another gang nominal by rival gang members instigated an engagement and crime prevention response to the increase in Serious Youth Violence. There are currently two mapped gangs hailing from Eastleigh who cause significant problems of gang violence and criminality whose impact also spans other Wards in the town and in some cases, across the county due to drug feuds between the county lines groups. Beyond gang-related incidents, the Eastleigh ward is classified as a key priority area for Prevent due to potential harms from extremism and vulnerability to radicalisation. Firearms originating from Europe have been recovered in the ward, raising concerns about the trafficking and importation of firearms. The street-level supply of both Class A and B drugs is committed daily, with police recording multi-kilo seizures of Class A, suggesting that more serious offences of importation are likely.

Violence Against the Person

The most common crime types in Dallow were Violence Against the Person (VAP), theft offences and public order offences. In Dallow, three offences have been linked to gun crime over the last three years. This included a violence without injury offence in November 2019, a robbery of a person in March 2021 and an assault occasioning actual bodily harm in June 2021. These offences appear to be unlinked.

Knife Crime

Knife Crime levels in Dallow have fluctuated over a three-year period but have shown an overall downward trend. There were, on average, two offences involving a knife per month. Knife crime peaked in November 2020, July 2021, and Nov/Dec 2021. These latter peaks aligned with local murder and retaliatory incidents of serious gang violence. The most common types of offences in which knives were used ranged from lower-level offences such as robbery to serious offences, such as threats to kill, attempted murder and assault. This indicates a tendency for perpetrators to use knives across a wide range of offences, which follows the increasing trends in the use of knives in crime nationally.

Domestic Abuse

Levels of domestic abuse in Dallow against female victims have fluctuated but followed an overall stable long-term trend. There are, on average, 14 offences of this type per month in Dallow. There were 156 Domestic Abuse Offences over the last 6 months in Eastleigh (Feb – August). Over a third had a primary classification of Domestic Abuse offences, whilst the majority of others were included under assault ABH / without injury and Stalking (pursue a course of conduct in breach of Soc 1 and involving serious alarm/distress). Levels of violence against person (VAP) offences in Eastleigh with female victims have followed a very slight upward trend over the last three years. There were higher levels of offending of this type between summer 2020 and summer 2021 but levels have decreased since then. There are, on average, 12 offences of this type per month in Eastleigh. Levels of sexual offending with female victims in Dallow have followed a slight long-term upward trend. There was a clear peak in offending of this type in October 2021. There are, on average, two offences of this type per month in Dallow. Domestic Abuse in families has seen an overall downward trend over three years, dropping from on average, four offences per month in Sept 2019 to two offences per month in July 2022. Cases typically have seen a spike in the autumn months, of September to November. The most common offender to victim relationship was Son (50%), Father (17%), Daughter (14%), Mother (9%), and step-relations (10%).

Missing Persons

Missing Persons reports related to 24 individuals, of which 16 had one report (22% of reports), three had two reports (8.3% of reports), and only five people had multiple missing reports (making up over 69.4% of reports in Eastleigh over the last year). Furthermore, only seven of the 24 individuals were of the age category 18 and above, all of whom only had one missing report filed against them. Most missing persons were individuals of 18 years and below (70.8% of MisPers), with 90% of reports made in the last year relating to this age group. This highlights a significant challenge within this age group, most of whom are under s20 care orders. The five Regular Missing Persons were all between the ages of 16 and 18 and were all located in care placements related to Section 20 care orders.

Furthermore, one 18-year-old 'misper' had been reported missing 28 times in the last year (2021-22). This presents significant complexities for the need to safeguard children and the increased susceptibility that being in a care placement presents for a young individual in becoming a regular missing person. These mispers had a range of complex issues, including drug dependency, criminal associates, previous domestic violence perpetration, mental health issues such as bipolar disorder, suicide risks, potential CSE and previous domestic abuse in the family.

The Dallow Cares Workstreams

The military connotations of CHB felt inappropriate for the work in Dallow; therefore, a new name was decided to focus locally on Neighbourhood Safeguarding. Primary school students from Eastleigh Primary School were invited to design a logo and title for the new initiative. 'Dallow Cares' was decided upon. The project aims to underpin a longstanding partnership approach to tackle the harms caused by individuals and groups involved in criminality within the Eastleigh ward by galvanising communities, strengthening resilience, and reclaiming the neighbourhood, ensuring a safe place for all residents to thrive in line with the town's 2040 vision and the local Policing Guidelines.

The Strategic Monitoring Group (SMG), consisting of the Police, Local Authority, Home Office, VERU, YOS and Prevent (Education) decided on six Dallow Cares workstreams:

- Crime
- Violence against Women and Girls
- Parenting Support
- Youth Digital Sphere
- Social Media
- Environment

The Operational Delivery Groups set up (from 15th November 2022) under the auspices of Dallow Cares were the Trauma Support Programme (Jan–March 2023, 10-week programme), the Parenting Support Coffee Morning at Eastleigh Primary School (9th February 2022); Eastleigh Community Festival (11th March 2022), the Inspire FM Radio Show (from March 2023)

Learning From the Dallow CHB Strategy

Senior leadership buy-in
Support from the outset by senior leaders, including local elected members, should be sought. This can unlock resources that enable the implementation of CHB and avoid potential problems later on.An analytical resource This is necessary to develop place-based SOC profiles. Analysis should incorporate all available local information at the onset, specifically the identification of threats. There should be input from partners and the community.

A dedicated CHB resource
There needs to be organisational awareness of the resources needed to implement CHB and to provide that over the long term to ensure sustained success. The old model of a crackdown before moving on to the next location has been shown not to work. Sustained dedicated resources are required to hold the location long enough to build sufficient community resilience that allow police resources to be be scaled back.

Additional neighbourhood policing resources
These are required for the 'hold' period. Neighbourhood officers require additional training to focus on disruption tactics effectively.

Asset mapping
It is important to identify what is already being offered at a local level, and then work to link different agencies instead of agencies working alone.

The right people
It is important to identify and involve key influencers in the targeted communities. This might mean working with people who would not normally choose to work with the police but who have an influence in the community. It is also important to find a neutral person acceptable to all sections of the community to chair the strategic community group and lead on developing project activities. The police can kick start the process but to succeed in the long term, the community must lead it.

Realism
For improvements to be sustained they must come from the community. But it takes time to build confidence, capacity and capability within the community, and to identify those with the skills to

ensure the relationships, activities and infrastructure of the partnership is maintained over the long term. CHB needs to be long-term.

Baseline measurement

Agencies need to ensure their data metrics can be monitored at the local level before starting interventions so monitoring and impact is consistently measured—for example, reoffending and recall rates from the Probation Service. Data should not just be from police sources but from all relevant agencies to give a whole picture. There needs to be a stronger focus on the standardised clarity of quantitative metric monitoring for future CHB piloting to inform impact tracking. Data needs to be in place at the outset so that baseline data can be recorded and data can be recorded consistently throughout. A data dashboard similar to the Figures above can show where crime is going down (for example, MoRiLE) and where prevention is working.

Communications

It is important to agree on how communications within and from the partnership group will be managed. Some stakeholders may be put in danger if it is seen that they gave information to the police that facilitated arrests or other police actions against local gang members.

Preparation for future stages CHB is a continuous process. It's important to have each consecutive stage ready, especially for the 'hold' phase. Hold is the first step that differs from previous, traditional ways of addressing SOC, as it acknowledges that making arrests is not enough alone. Preparing and launching the hold stage to provide a seamless move towards the 'build' stage is vital to realise the difference offered by the CHB framework.

Branding

It is important not only to use police language or acronyms. CHB is a collaborative multi-agency approach to building up the community, so CHB should be explained in terms everyone understands. A name for the initiative that reflects the community is important.

Collaborative working

The 'clear' phase will be largely dealt with by police through enforcement. But partner agencies should be prevalent in the hold phase and local government strategic structures should lead during the build phase. Partners should lead operational delivery groups, aligning interventions based on threat and need. The hold and build phases are key for collaborative work and help agencies achieve a common goal.

Ucko (2013), Writing about the original counterinsurgency model of CHB warns that understanding local politics and economy is central if the model is to succeed. There will be illicit economies less harmful than others, and it is a matter of prioritisation of most harm in deciding where to deploy resources. If Bedfordshire is serious regarding a multi-agency public health approach, the focus should be supply and demand reduction. Recommendations have been made above regarding Diamorphine Assisted Treatment in Bedfordshire, and the focus on supply reduction should be targeted upstream towards the middle managers of the middle market who exploit and control vulnerable adults and children.

Concerning the roll-out of CHB Minatti,& Duyvesteyn,(2019), writing about the original counterinsurgency model of CHB, argue that different models are required for different areas as each area displays its own characteristics.

Concluding comments

The work of the Tree projects, VERU and Dallow Cares has laid good foundational approaches towards devolved multi-agency Youth and Community Hubs from which to address gangs and related violence, and these approaches have the potential to be developed further into interagency teams with seconded staff to provide focused services which build trust and confidence on encouraging communities to become more actively involved in addressing gang-related crime. However, these community hubs also require coordination and must be mainstreamed into strategic community safety plans spanning three Boroughs. We recommend that a Bedfordshire Multi-agency Gang Strategy be developed across the three boroughs to pursue three clear and interrelated aims because the proliferation of aims and objectives that currently exist risks blurring the focus of a strategic approach, which, in turn, could lead to 'mission drift'. The Aims of the strategy would be:

- To stop gang-related grooming and violence in sexual and criminal exploitation of children and vulnerable people involved in the trafficking of drugs.
- To disrupt and reshape the illicit drug distribution networks which utilise vulnerable children and young people.
- To neutralise the impact of County Lines trafficking drugs in and from Bedfordshire.

The core components of the strategy would require further consultation with key stakeholders across the three boroughs. The findings from this report could be utilised to inform another cycle of action research to explore in depth the current partnership landscape, new priorities and resources available conducted by an honest broker.

Appendix 1

An Advisory Board Model for Reflective Practice in Modern Slavery Cases.
An output from the British Academy Innovation Fellowship:
Co-Production in Child Criminal Exploitation.

Dr Paul Andell and Inspector Kelly Gray.

Introduction and Background

Practice and policy decisions which lead to victims being the forgotten party of the criminal justice process have evoked concerns from academia and practitioners alike for many years (Walklate 2006, College of Policing 2021). Constructed divisions between deserving and undeserving victims in County Lines cases is a contemporary "Wicked Problem" (Rittel and Webber 1973), which has witnessed shifts in policing responses away from foregrounding young people as perpetrators in County Lines drug supply towards a recognition of victimhood related-to modern slavery and criminal exploitation. These shifts in practices are demonstrated by the number of referrals of British nationals referred to the National Referral Mechanism (NRM) since 2013, rising from 90 in 2013 to 3,952 in 2021. The NRM is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. However, the NRM itself is also identified as a support framework in need of further development for the timely identification of potential victims of modern slavery (Murphy et al., 2022).

To make sense of, and create meaning from practice, an Advisory Board was called by the ERSOCU County lines co-ordinator. An Advisory Board provides non-binding strategic advice to organisations. In this case, the Board's function was to create a dialogue between local practitioners to reflect and learn from a particular case to enhance future practices. In the case study selected for discussion, final charges were brought which did not match the initial expectations of investigators and legal advisors. In compliance with the Director's Guidance, under the provisions of section 37A of the Police and Criminal Evidence Act 1984, police officers involved with the case met with Crown Prosecution Service (CPS) lawyers and pre-charge advice was sought (Director Guidance for Charging 2020) and charges were brought under Section 2 of Modern Slavery Act. However, following a Pre-trial Process Hearing attended by a barrister acting on behalf of the CPS, Modern Slavery charges were dropped, and defendants were charged with possession of a controlled drug with intent to supply it to another, under the Misuse of Drugs Act 1971 (section 5(3)).

Early reflections on the change of charges prompted further discussions regarding improving the collection, collation and presentation of evidence to ensure future agreement for the most appropriate charges to guarantee victims' rights (Right 4 Victims' Code for Policing, College of Policing 2021).

In preparation for the reflective practice session at the Advisory Board, practitioners were furnished with pre-trial disclosures, including Expert Witness Statements, MG 25s, and MG 23's to begin a reflective process to explore what might have been done differently to foreground the Modern Slavery aspects of the case to ensure that full and fair assessment was given to modern slavery charges to enable victims voices to be heard in the current case, and for potential future victims to be protected.

This paper presents a summary of reflective practice processes and "boundary work" as applied to a specific modern slavery case, which involved the exploration of police professionals' understandings of strengths and weaknesses of both internal, intra-professional policing practices and external, inter-professional multi-agency practices (Crawford and L'Hoiry 2017).

Critical Reflection

An Advisory Board was called with policing and academic membership to ensure best professional practices were adhered to as outlined in the Competency and Values Framework for policing (College of Policing, 2016), and current research was inputted to the meeting. The College of Policing Framework outlines proficiencies for policing, which can arguably be encapsulated in processes of reflective practice. The College of Policing defines reflective practice as:

> the ability to reflect on your actions and improve the way you work. It is considered a key skill in practice-based professional learning. To get the most from reflective practice, the practitioner must be willing to continuously assess their own practice and performance in consideration of any new learning (College of Policing. Resources for Reflective Practice -no date).

Critical reflection, as cited by Norman et al. (2022), is "the ability to reflect on one's actions to take a critical stance or attitude towards one's own practice and that of one's peers, engaging in a process of continuous adaptation and learning" (Schön, 1983, pp. 102–104). In critical reflection is useful to apply theories or ideas to motivate an analysis of the problem and to provide solutions. The process allows people to reflect at both individual and wider levels. Ie. Reflection on an individual's work and actions in their work context.

The Aims of the Reflective Session

The main aim of the session was to explore professional perceptions of practices exercised in criminal exploitation in the context of County Lines and Modern Slavery to identify how practitioners recognise and respond to children and vulnerable people at risk.

The ERSOC co-ordinator gave an outline summary of the case and facilitated the session with questions which broadly guided the parameters of the session to include:

- Understanding opportunities presented through working across organisational boundaries
- Understand barriers to why some young people may not be identified as victims and may not engage with support.
- What are the different police practitioners' perceptions of criminal exploitation in complex drug cases? Have parallel investigations for drug supply and exploitation been conducted?
- How might police and other practitioners, such as the CPS, recognise and respond to children and young people at risk of within the context of a complex drug case?
- How are these risks presented in pre-charging documentation to attain the most appropriate criminal charge and court outcome?
- How might current practices and frameworks be further reviewed to assist best practice both locally, regionally and nationally?

Emergent Policing Practices

The tone of the Advisory Board was set as a learning experience in order to encourage participation from attendees and to promote both reflections in and on practice (Christopher 2015). From discussions of best practice in investigating County lines (Gray 2022) it was agreed that a strategy of parallel investigation whereby the concerns of both safeguarding and criminality need to be assessed and prioritised both internally and externally in line with current legislation and guidance.

With regard to internal policing practices, suggestions were forthcoming regarding the role of supervisors in conducting investigations to ensure that simple binaries of deserving and undeserving victims were avoided (Christie 1986). It was suggested that some practitioners may require further training opportunities to consolidate their understanding of victimhood's complexities. In undertaking such training, the potential effects on practice may be that the vulnerabilities of potential witnesses could be more fully investigated with other professionals, such as social workers from Early Help teams. This collaborative evidence may assist in objectively demonstrating vulnerability about the offence and provide better evidence for appropriate charging.

Suggestions were also made for potential closer working relationships between policing teams which sometimes demonstrate differing occupational cultures (Chan 1997). For example, differing priorities from police safeguarding and drug teams emerged in the case under review. This was acknowledged to be a recurring obstacle in County lines investigations as opposed to more progressive and effective practices of a dual investigative ethos for both welfare and crime to ensure victims rights, particularly in cases involving young people (Smith 2005). Best practice was also suggested by the Essex Police Service, where diverse teams of safeguarding and drugs are managed under a single directorate to ensure cross-fertilisation of priorities.

Multi-agency Work with the CPS and Evidential Rules

How interviews are conducted was reflected upon in relation to CPS partners and rules of evidence. A better understanding of CPS concerns is required to work closely with the CPS.A review of the charging process in the current case under consideration has been requested from the CPS for further reflection. Moreover, discussions ensued regarding the burden of proof, which lies with the prosecution to prove its case to the legal criminal standard of beyond reasonable doubt at trial. If the prosecution fails to prove the allegation to the criminal standard of beyond reasonable doubt, the defendant must be acquitted (Woolmington v. DPP 1935). It was recognised that the prosecutor exercises discretion over whether to prosecute for various offences, and this discretion is informed by The Code for Crown Prosecutors (CPS, 2018) and other prosecution policies.

Brief discussions ensued regarding the code (CPS, 2018) which establishes a two-stage test, the 'Full Code Test', which is applied to determine if a prosecution should be brought for a particular allegation. For a prosecution to proceed, both the evidential and public interest stages of the 'Full Code Test' must be met. Firstly, the CPS must be satisfied with a 'realistic prospect of conviction' based on an objective analysis of the evidence. As part of that assessment, the prosecutor should consider whether the evidence is:

- admissible (whether the rules of evidence allow it to be used),
- reliable (accurate and trustworthy),
- credible (believable).

To tailor practices and reports in recognisable ways to CPS prosecutors, how MG3s are constructed and presented by police practitioners should be considered further. Moreover, if evidential rules were considered in greater detail when interviewing and preparing MG23s, then issues of exploitation could be foregrounded more obviously for CPS partners.

The prosecutor only applies the public interest stage of the test if the evidential stage is met. The public interest stage recognises that not every allegation of criminal misconduct should be prosecuted and that some matters can be adequately dealt with by way of out-of-court disposals, such as simple

or conditional cautions (perhaps for those playing a lesser part in an offence or who are groomed to take part) although these still form part of the defendant's record.

Colman (2023) suggests the 'Decision Making in Gang Related Offences' policy (CPS, https://www.cps.gov.uk/ legal-guidance/gang-related-offences-decision-making, no date) does not guide the prosecution of specific criminal offences, such as modern slavery, but furnishes key principles which are relevant to offences that are alleged to be gang-related. The policy affirms that 'prosecutors must ensure that where there is admissible evidence of gang membership, the case is put on a basis that reflects the serious gravity of the offending. Therefore, prosecutors are obligated to consider whether there is relevant evidence of a gang dimension to the case, but their decision to argue that the offence is gang related must be evidence-based which is reliant upon the police investigation and questioning.

Questions were raised regarding the case under review if sufficient evidence of gang involvement was foregrounded, particularly from the phone evidence, the statement from the main victim (a young female) and expert witness evidence. Was this evidence sufficient to **objectively** convince the CPS of criminal exploitation and modern slavery? If not how might objectivity be obtained? Were the correct questions raised in interviewing victims? How was the evidence presented to the CPS for review and how can decisions subsequently be discussed to understand differing roles and perspectives so that core functions of each role can be fulfilled within the boundaries of professional standards of best practice?

A number of essential elements have to be proved by the prosecution for each offence. These elements consist of actus reus (the criminal act) and mens rea (the mental elements of the offence). Clearly, the actus reus of criminal exploitation was demonstrated through some of the co-defendants being vulnerable and children (as consistent with the Palermo Protocol), but was the mental intent of exploitation of a power dynamic to exploit for criminal purpose fully demonstrated by one or more of the defendants shown?

The statements circulated prior to the meeting show the buying of food for a minor but this may not be considered as meeting evidential requirements to show beyond reasonable doubt grooming and exploitation. It could be conversely argued that the act of buying food was carried out with charitable intent. The later evidence of payment of a child for bagging drugs (with elements of reluctance demonstrated) presents a picture which may be deemed coercive, but these actions were not shown to be directly carried out by, or under the direction of, the defendant for which allegations of were initially CCE made.

Patterns of behaviour could have been usefully assessed by the expert witness to draw together aspects of evidence that jurors may not fully comprehend in the context of exploitation, such as the concerns raised by one boy's mother or the allegations of the presence of a firearm or the presence of a machete in the flat and how this may impact on vulnerability in relation to offending behaviour.

Colman (2023) argues:

> Expert evidence must be relevant to an issue in the case; it must be capable of assisting the jury or bench of magistrates in determining an issue at trial. However, relevance alone is not sufficient; the evidence must also be admissible in accordance with the rules of evidence. A witness may be permitted to give opinion evidence provided that they are an appropriately qualified expert in the area and the evidence that they are providing is within their area of expertise.

Questions were asked in the Advisory Board regarding using an expert witness who happened to be a police officer. Questions were focused towards if police officers were appropriately qualified or had sufficient experience of assessing vulnerability to the standards required by the court in County lines cases. This is mainly because previously the court has restricted when expert evidence is allowed:

> In R v. Turner [1975] Lawton LJ stated that, 'An expert's opinion is admissible to furnish the court with scientific information which is likely to be outside the experience and knowledge of a judge or jury.' If the issue can be properly understood by the jury and a decision made based on their experience and knowledge then expert evidence would be superfluous and should not be admitted... (Cited by Colman 2023)

Moreover, Colman (2023) further cites the case of Myers v. The Queen [2015] which raises issues if police officers should be used as expert witnesses, as evidence may not be admissible in certain cases, depending on the context however conversely he also cites R v. Hodges [2003] which ruled that police officers can be used as expert witnesses in drugs cases to determine if amounts were for personal use or supply. It was suggested that case managers should be fully cognisant of these cases when decisions are made to employ expert witnesses.

Colman (op cit) further argues that rules of evidence can be viewed as attempting to redress imbalances by ensuring that the State is only permitted to produce evidence which is relevant and sheds light on the issues in dispute in the case. (Keane and McKeown, p.3). Witness evidence which is given orally before the court. However, most of this evidence is the empirical experience relayed by witnesses describing what they experienced or observed first-hand. Generally, witnesses are not permitted to offer opinion evidence. This may be an important point for the interview techniques deployed. In the case study discussed an interview with a witness who claims one defendant was controlling the others. However, it was thought that further clarity and demonstration of objective evidence was needed in the questioning process of the interview. With hindsight, better questions may have also assisted the adoption of a modern slavery charge by the CPS.

National Law and Guidance on Modern Slavery and Risk Management Tools

It was suggested to the Board that most police practitioners continue to consider the welfare of victims by professionally considering exploitation as a factor in County lines cases but work is conducted within limited frameworks of existing UK law (the Modern Slavery Act 2015) and Criminal Justice Guidance guidance (see above). Questions have been raised previously regarding legal definitions of human trafficking and modern slavery and how this may specifically relate to county lines. For example, questions raised in the House of Commons have included the tabling of amendments for a more translucent and applicable definition in the Modern Slavery Act 2015 (Hansard 25th April 2021 Column 215). And a current review has been announced (7th Feb 2023) by the Home Affairs Committee to assess the need for changes in the legal definitions and frameworks. Submissions to the Home Affairs Committee were suggested at the Advisory Board.

The Board discussed regional interventions. ERSOU provides consultation and operational support in complex organised crime cases and county lines. Hydra training, conferences, and individual support and advice is available, as well as intelligence resources and tactical resources for "Intensification weeks". Ideas of reflective practice and case study work have received positive feedback from participants and, after further appropriate reflections with senior staff and team members, may add to the tools of support available. At the regional level, the roles of Local Criminal Justice Boards were

discussed. As a forum for service senior leaders to meet to discuss regional criminal justice needs, the forum was thought to be a useful space to discuss local prosecution policy for child exploitation to achieve better interdisciplinary or "boundary" work, whereby the police and CPS could agree on a more consistent approach.

More locally, work with community safety partnerships was discussed. Across counties practices were thought to be inconsistent and were thought to be hampered by poor communication with some agencies, and in other cases, there were thought to be a lack of engagement. Strategic plans for drugs and county lines at a County level do not always reflect a useful oversight of the myriad of partnerships that have operational responsibility for the delivery of services, which include welfare and justice functions. However, the Board reminded investigators working on drugs and county lines operations of civil orders available under the Modern Slavery Act. Slavery & Trafficking Prevention Orders (STPOs) and Slavery and Trafficking Risk Orders (STROs) are civil orders which enable courts to place restrictions on the activities of individuals believed to be at risk of modern slavery offending. The standard of proof required is an enhanced civil standard of proof, like the criminal standard of proof of being sure beyond a reasonable doubt.

STPOs can be made on convicted or cautioned people who have previously been involved in slavery or human trafficking offending, or equivalent offences, abroad. STROs can be made on those at risk of offending, where an order is considered necessary to protect against the risk of harm to others from the defendant committing the offence. They could be considered a risk management tool for suspects presenting a criminal exploitation risk to others. Unlike an STPO, they do not require a conviction or a failed conviction the absence of the application of appropriate national regulations and resources, it was thought that these tools could assist with a harm reduction or risk management approach in managing the risks arising from criminal exploitation in county lines. The impact of international conventions on local policy agreements was also discussed at the Board to guide a "glocal" approach. I.e. a localised operationalised policy informed by the thinking of international law. It was recognised that international conventions such as the Palermo agreement mainly applied to transnationally trafficked young people, but it was thought that the spirit of the convention provided a useful guide for some practices.

International Law

The Palmero Protocol is supplementary to the United Nations Convention against Transnational Organized Crime, adopted on 15th November 2000, it provides articles which set out a comprehensive international convention against transnational organised crime and discusses further international instruments, particularly the trafficking of women and children. Under Article 3 (d) children are considered under 18 years of age. The board briefly discussed national law conflicts and the current age of criminal responsibility in the context of criminal exploitation and vulnerability from criminal exploitation. For example, Article 3 refers to "Trafficking in persons" which means the recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for exploitation.

The Palermo Protocol establishes children as a special case for whom only two components are required to demonstrate trafficking, movement and exploitation because a child can not give consent to being exploited, even if they are aware/agreeable to being moved. In the current vacuum of national definitions and regulations regarding Modern Slavery and Child Criminal Exploitation, international conventions were thought by the Board to be useful.

Conclusions and Recommendations.

Overall, the feedback regarding the Board as a learning tool and the process of stepping back and reflecting in and on practices was beneficial by participants. It was suggested that,

Locally, there was a need for further development of enhanced knowledge of safeguarding practices relating to an understanding of (1) risk, vulnerability factors and the signs of criminal exploitation through County Lines, (2) the importance of ensuring a multi-agency response undertaken to protect victims and collect evidence (3) understand more fully how legal processes offer victims protection and the need for more objective demonstrations of vulnerability related to the offence rather than general vulnerability(4) the importance of theoretically informed relationship-based practice guided by reflection and action research informed principles.

Regionally, the ERSOU county lines coordinator should replicate the process of Advisory Boards to create a dialogue between local practitioners to reflect and learn from specific cases to enhance future practices.

Service leaders from the CPS and Police should develop regional guidance at the Local Criminal Justice Board to support victims through appropriate prosecution of perpetrators of Modern Slavery utilising the Modern Slavery Act 2015), existing case law (R vs KWA), CPS guidance (Decision Making in Gang Related Offences) and international human rights protocols (Palermo Protocol 2000).

Nationally, submissions should be made to the Home Affairs Committee to adopt specific, clear definitions in the law of Modern Slavery as applied to count lines drug supply networks.

Appendix 1 References

Crawford A. L'Hoiry X (2017) Boundary crossing: networked policing and emergent 'communities of practice' in safeguarding children. Policing and Society. Vol 27.
https://www.tandfonline.com/doi/full/10.1080/10439463.2017.1341508
(Accessed 27 February 2023)

Chan, J. (1997) *Changing Police Culture*. Cambridge: Cambridge University Press.

Christie, N. (1986). *The Ideal Victim*. In: Fattah, E.A. (eds) *From Crime Policy to Victim Policy*. Palgrave Macmillan, London.
https://doi.org/10.1007/978-1-349-08305-3_2

Christopher, S. (2015) The Police Service Can Be a Critical Reflective Practice... If It Wants*, Policing: A Journal of Policy and Practice,* Volume 9, Issue 4, December 2015.

College of Policing (no date) Resources for Reflective Practice.
 https://assets.college.police.uk/s3fs-public/2020-11/Resources_for_reflective_practice_v1_0.pdf
(Viewed 27 February 2023)

College of Policing (2021) *Victims' Code for policing*
https://www.college.police.uk/guidance/victims-code/victims-rights-policing
(Viewed 27 February 2023)

Colman, S. (2023) in *Andell and Pitts Palgrave Handbook of UK Gangs*. London, Palgrave.
Pages 326–339, https://doi.org/10.1093/police/pav007

CPS Guidance.
https://www.cps.gov.uk/legal-guidance/gang-related-offences-decision-making
(No date)

Directors Guidance (2020) Charging, sixth edition, Legal Guidance Issued by the Director of Public Prosecutions under the provisions of section 37A of the Police and Criminal Evidence Act 1984.
https://www.cps.gov.uk/legal-guidance/charging-directors-guidance-sixth-edition-december-2020
(Accessed 28 February 2023)

Gray, K. (2022) ERSOU Briefing on County Lines (Unpublished policy briefing).

Home Affairs Committee (2023) Enquiry into Human Trafficking.
https://committees.parliament.uk/committee/83/home-affairs-committee/news/185985/new-inquiry-examines-human-trafficking-in-the-uk/
(Viewed 28 Februrary 2023).

Keane, A. and McKeown, P.(2021) *The Modern Law of Evidence,* 13th Edition.

Murphy, C. Heys, A. Barlow, C. Gleish, L. Wilkinson, S. (2022) *Identifying Pathways to Support British Victims of Modern Slavery towards Safety and Recovery: A Scoping Study*
https://www.stmarys.ac.uk/research/centres/bakhita/docs/bakhita-centre-modern-slavery-report-august-2022.pdf
(Viewed 27 February 2023)

Norman, J., Fox, A., Harding, R. et al. Critical Reflection: The Importance of Case Reviews and Reflective Practice in Rape and Serious Sexual Offences Investigations. Int Criminol 2, 276–285 (2022). Https://doi.org/10.1007/s43576-022-00061-2

Palarmo Agreement (2000) P*rotocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children*, supplementing the United Nations Convention against Transnational Organized Crime.

Rittel, H.W.J. and Webber, M.J., 1973. Dilemmas in a general theory of planning. Policy sciences 4, 155–169. doi: 10.1007/BF01405730.

Schon, D.A. (1983) The Reflective Practitioner: How Professionals Think in Action. Basic Books, New York.

Smith R. (2005) Welfare versus Justice - Again! *Youth Justice* 5(1): 3-16.
DOI: 10.1177/147322540500500102

Walkelate, S. (2006) So Who Are The Victims Now?
https://mmuperu.co.uk/bjcj/articles/so-who-are-the-victims-now/
(Accessed 27 February 2023).

Appendix 2

Home Affairs Committee
Human Trafficking; Submission of Evidence

Dr Paul Andell Associate Professor of Criminology UoS, British Academy Innovation Fellow PDC&YPS, FHEA, PGDHE, MA (Dist), BA, CQSW, DCR(R).

Introduction and reasons for submission.

The following submission for the Home Affairs Committee on Human Trafficking is submitted on an individual basis. I believe I am qualified to contribute to the call for evidence given my past professional experience and current research interests.

I am an Associate Professor of Criminology at the University of Suffolk. I am also a qualified social worker. I have an MA (with distinction) in Criminology, a Professional Doctorate in Leadership in Child and Youth Peoples Services and have published extensively in the fields of UK gangs, drug markets and child exploitation. I am the co-editor of the Palgrave UK Handbook of Youth Gangs (2023). I have previously worked as a residential social worker, a probation officer, a group worker in youth justice, a facilitator and mentor in gang exit work and was the Communities Director for Brathay a youth leadership charity responsible for the Brixton gang X-IT project. I was also Community Safety Managergang-associatedfor the Greater London Authority and a London Criminal Justice Board member. I am a current member of the All Party Political Group on Alcohol Drugs and Crime, the Eurogangs Research Group and advisor to the national Independent Advisory Group, Action for Race Equality. I was awarded a commendation for my mentoring work with gang associated young people from the Home Office Violent Crime Unit.

Since 2009 I have undertaken research on violent youth gangs and evidence from my research work was utilised by the national charity, the Children's Society, Dame Carol Black's UK Review of Drugs and the National Independent Practice Review of County Lines. I recently received an international prize from the American Society of Criminology (Rural Crime Division) for policy and practice application for research undertaken on county lines. I am a British Academy Innovation Fellow currently undertaking "action research" on responses to child criminal exploitation.

I am aware of diverse and sometimes intersecting forms of Human Trafficking. I submit this evidence primarily supporting domestic policy changes focused on child criminal exploitation associated with county lines drug dealing. The submission's bedrock is the UN Convention of the Rights of the Child, referred to as the Convention. In keeping with Article 4 (implementation of the Convention), I hope to assist the UK Government make the necessary changes to UK law and guidance to keep pace with this rapidly changing social problem. For this submission, I have adopted a "child first" approach, a principle first outlined in the Youth Justice Board /Ministry of Justice national standards (Youth Justice Board Strategic Plan 2019), which aims to respond to all young people's involvement in offending as an issue of 'unmet needs and identifiable problems' (Case & Haines, 2015). I believe such an approach will assist the Government in ensuring children's safe passage into adulthood under Article 6 of the Convention (life, survival and development) and Article 19 of the Convention (protection from violence, abuse and neglect). The submissions recommendations are also underpinned by the UN Sustainable Development Goals, namely goal 16.2, which encapsulates a specific target (SDG 16.2) in the 2030 Agenda for Sustainable Development to end all forms of violence against children and "*gives renewed impetus towards the realisation of the right of every child to live free from fear, neglect, abuse and exploitation*".

1. **What is the scale and nature of human trafficking in the UK? Considering in particular:**

   a) **Different types of exploitation (including sexual, labour, or criminal exploitation.**

   According to the Police National Insight Team (17/2/23), there are currently at least 3637 live Modern Slavery police investigations being undertaken across the UK and there are active investigations across all policing regions. According to the Insight Team, diverse forms of Human Trafficking currently investigated include, 596 (16%) cases of Sexual Exploitation: these investigations primarily tackle sexual exploitation; 630 investigations which identify sexual exploitation at a primary level or otherwise; 2214 (61%) of Criminal Exploitation, the investigations primarily tackle criminal exploitation (county lines/cannabis cultivation/fraud/ theft); 2259 investigations which identify criminal as an exploitation type, at a primary level or otherwise; 531 (15%) investigations of Labour Exploitation within a range of sectors the most frequently occurring are construction, car washes, the food industry (preparation, service manual labour, factories and health & beauty; 570 investigations identify labour exploitation at a primary level or otherwise; 78 (2%) of investigations primarily tackle Domestic Servitude; 83 investigations identify exploitation through domestic servitude at a primary level or otherwise; 2 (<1%) investigations are focused towards Forced/Sham Marriage which involve tackling forced or sham marriages at a primary level or otherwise.

   Human trafficking occurs in county lines drug dealing as part of Modern Slavery, legal recognition was given following a landmark case in 2017 in which offenders were prosecuted under the Modern Slavery Act (2015) for involvement in county lines–related drug trafficking and exploitation (Stone, 2018). Given the widespread emergence of human trafficking in the form of child criminal exploitation in county lines (Harding 2020), and the subsequent proliferation of current investigations which highlight the current lack of specific legislation to address it, the nature of this current social problem warrants further attention in UK law. In County Lines, Violence, Exploitation & Drug Supply (2017) the National Crime Agency (NCA) describes how street gangs and other organised crime groups exploit vulnerable younger adolescents to distribute narcotics to 81% of the 43 police areas in England. The NCA describe these groups as 'Urban Street Gangs', 'Organised Crime Groups' or 'Dangerous Dealer Networks'. Coomber (2015) refers to them as 'Second Generation Street Gangs'. Today, these drug dealing networks span most of the country and, as the NCA working definition of County Lines suggests, the dividing line between street gangs and organised crime, the retailers and the wholesalers, has become blurred as older gang members have evolved into middle-market drug wholesalers. This presents topological problems in deciding appropriate interventions.

   A county line is a telephone line set up by a gang in a city to sell Class-A drugs, normally heroin, crack cocaine and cannabis, to users, sometimes in out-of-town locations (Andell and Pitts 2017, Coomber and Moyle 2016; Wendle and Briggs 2015 Harding 2014, Pitts 2008). County Lines have become a major conduit for illicit drug distribution in England for four main reasons: because big city drug markets are becoming 'saturated' (Windle & Briggs, 2015); because the competition with other local gangs has become too brisk and too dangerous (Pitts, 2016); because the dealers have become too well known to the local police; and because the gangs anticipate that they will meet with less resistance from the police and local dealers in new 'Country' locations (Drugwise, 2017).

   Investigations of organised crime by the police can be initiated nationally, regionally or locally with intelligence managed via the National Intelligence Model. Inaccurate or non-operationalisation of this model can sometimes lead to disconnects via unclear assessments of harms from individuals

forming part of a network, either by under or over-estimations (Sergi 2017, Andell 2019). Therefore, further clarity is needed in new or amended legislation on the legal categorisation of the activities involved in human trafficking, criminal exploitation and modern slavery as they relate to county lines, drug networks and "local organised crime" groups (Andell 2023).

Official figures for crime trends are usually based primarily on the Crime Survey for England and Wales (CSEW) and police-recorded crime data. It is widely accepted that these figures only represent the tip of the iceberg as much activity will be poorly identified, go unreported, or misclassified. The scale and impact of human trafficking related to county lines will not be fully represented in current investigations or official statistics, this is sometimes known as "the dark figure of crime" (Beiderman and Reiss 1967). The Office for National Statistics (2019) has carried out previous work on general crime and the dark figure but more focused work is needed to both estimate the true figures and to accurately flag intelligence relating to human trafficking in county lines. To assist this process all criminal justice recording systems should flag county lines behaviours and potential modern slavery offences. This would not only assist the estimations of the scale and intersections of differing forms of human trafficking, but would also assist investigators and prosecutors in devising appropriate lines of inquiry and develop evidential tests which are specific to the actions under scrutiny.

b) The profile of victims and perpetrators

Human trafficking in county lines is dependent upon the criminal exploitation of children and vulnerable people (Coomber and Moyles 2018). The young people who are trafficked to deliver the drugs are usually male and from relatively deprived communities (Andell and Pitts 2017), but not exclusively so (Harvard 2022) and are aged between 12 and 17 (Robinson et al. 2019; Harding 2020). Recent findings (Andell forthcoming) suggest that the age of involvement is becoming progressively younger, with exceptional cases identified below ten years old. There is evidence to suggest targeting of vulnerable and young people who provide a malleable workforce for the drugs business (Moyles 2019). Exploitation often involves threats of violence, actual violence and sometimes the payment of cash or gifts to entice involvement and ensure compliance of children as participants in the drug trade (Andell 2019). Sometimes, young people are "set up" to be debt enslaved by being given drugs to hold or carry and then robbed by the group who supplied the drugs in the first place (Andell and Pitts 2017). However, respondents also report that so-called grooming for trafficking in relatively deprived neighbourhoods can also take the form of an offer from an acquaintance or friend to make money, albeit illegally (Andell forthcoming). Atkinson-Shepherd et al. (2023) raise the importance of considering coercion in county lines trafficking as multi-faceted, occurring in both inter-and-impersonal contexts. This raises issues regarding CPS guidance when applying the Code for Crown Prosecutors in county lines exploitation cases. The Code should clarify precisely what requirements there are on defendants and prosecutors when considering and deploying the statutory defence.

Many current respondents in research interviews appear to be confused regarding the differences between victims and perpetrators in county lines exploitation (Andell forthcoming). This is unsurprising, given divisions between deserving victims and undeserving perpetrators, in such cases, are often not clear cut and the dyad of victim and perpetrator is difficult to demark. This victim/perpetrator dilemma can be viewed as a contemporary "Wicked Problem" (Rittel and Webber 1973) which may be due to partial or conflicting knowledge, multiple causal tendencies of the problem, and fragmentation of the necessary partnership work involved

in safeguarding young people (Crawford and Xavier 2017). Given the challenges of keeping children safe, which include, uncovering complex power dynamics and overcoming obstacles in boundary work between professionals, timely case-by-case independent assessment emerges as key priority in this area of work. This becomes more vital in cases when older children are thought to have exploited younger ones. Assessments of this nature are currently undertaken centrally through the National Referral Mechanism (NRM) and by evidence provided to the Court through expert witnesses.

The NRM provides an independent framework for identifying potential victims of modern slavery and is meant to ensure appropriate support for victims. The number of referrals of British nationals referred to the National Referral Mechanism (NRM) since 2013, has risen from 90 in 2013 to 3,952 in 2021(Centre for Social Justice and Justice Cares 2022). Unfortunately, time delays frequently occur with referrals causing long delays at Court. The assessment process is undertaken centrally at the Home Office, often with a lack of knowledge of local partnership support mechanisms. Murphy et al. (2022) argue that the NRM process needs further development to ensure the timely identification of potential victims of modern slavery. Directives embedded in legislation could facilitate configuring more localised assessment mechanisms, which would cost-effectively reduce waiting times. These mechanisms would ensure that assessments of victimhood are based on all relevant factors and could also provide for recommendations for ongoing support to reduce the likelihood of further victimisation.

Patterns of behaviour are also usefully assessed by expert witnesses to draw together aspects of evidence that jurors may not fully comprehend in the context of exploitation.

olman (2023) argues, that expert evidence must be relevant to an issue in the case; it must be capable of assisting the jury or bench of magistrates in determining an issue at trial. However, the evidence must also be admissible by the rules of evidence. A witness may be permitted to give opinion evidence provided that they are an appropriately qualified expert in the area and the evidence they provide is within their area of expertise. Some professionals believe the evidence relied upon by expert witnesses is sometimes incomplete. Therefore it may be timely to issue guidance on the types of evidence relied upon to ensure impartial views.

c) **The gendered aspects of human trafficking**

Research for the Children's Commissioner (Firmin 2015, Beckett et al 2013) suggests that for girls joining the gang, the road towards being trafficked tends to be a process of 'seduction' rather than 'coercion', sometimes following in the footsteps of an older sister, or more often, an older brother, who is already a gang member; or starting a relationship with a gang-involved boy or young man. Initially, at least, girls and young women tend to be attracted to gangs by the 'glamour' (Andell and Pitts 2017) and the easy money but eventually find themselves locked into a set of exploitative relationships which are hard to walk away from (Firmin, 2009). For many of these young women, the gang appears to offer an alternative to, and possibly protection from, a difficult or abusive family situation, a 'real' friendship, and a sense of being appreciated and popular. Harvard (2022) suggests that girls and young women from all demographics are targeted by gang members and used to transport drugs and weapons from urban areas to rural locations and coastal towns. Under the Palermo Protocol (2000) the facilitation of movement such as buying train tickets, can be viewed as trafficking. In London's Waltham Forest in 2018, Whittaker and Harvard found that "clean skins" — especially young women and girls, not previously known to police and statutory agencies and often from wealthier backgrounds — are being targeted by gangs.

Gang members might, for example, leave guns, money or drugs at the homes of girlfriends, younger children or people they have bullied, knowing that they will not reveal this to the police because of the risk of a violent reprisal. These people are often chosen because they have no criminal record or history of arrests. Current findings (Andell forthcoming) reveal the continued use of young girls for hiding and storing drugs and weapons because both prevention and enforcement agencies often overlook this demographic. Further provision must be available for vulnerable women and girls in designing prevention and enforcement responses. For prevention, this could relate to specific services for girls in youth provision (see below); for enforcement this means that girls and young women are not avoided as suspects, but the potential features of coercive control should also be foregrounded as a factor in offending behaviour. In doing so this would also fulfil police obligations under their duty to identify and protect victims of domestic abuse (Pitman 2023).

d) The role of technology in facilitating human trafficking.

County lines as an aspect of human trafficking, rely heavily upon the use of technology. Mobile phone 'lines', and other online networks connect the drug supplier with new markets, and social media is utilised to recruit drug sellers (Andell 2023). The reliance on technology in drug distribution is at a stage of development not experienced previously (Coomber and Moyle, 2018). Many interests converge in networks which involve human and non-human actors in constantly shifting networks of relationships (Latour 2005).

Currently, in the UK, a dimension of gang culture which is ambiguously associated with crime and violence are the linguistic signifiers often found in Drill music clips shared through social media. Drill music (a sub-genre of Hip Hop), provides distinct cultural narratives which voice social and political concerns through lyrics and symbolism (Barron 2013, Ilan 2015, Andell 2019). The range and depth of this "performance" form a continuum from positive creative social contributions to negative expressions of gang life (Eubanks 2017). Many young people use linguistic forms to distinguish themselves from the 'straight adult world' and have done so throughout recent history. In contemporary practices and communications on social media, often overblown claims of violence can be made, and it is difficult to discern the difference between the performative and the real. Individuals utilise linguistic codes to describe their thoughts and actions, which come from culturally available vocabularies, and these, in turn, are sometimes subject to broader social and educational constraints (Archer 2003). Pitts (2013), warns of the dangers from the legal system that arise from a naive content analysis of YouTube clips. He argues that such analysis can be undertaken in a decontextualised enforcement framework and used as evidence for "Bad Character" and "Joint Enterprise". Given their origins in the entertainment industry (Hagedorn, 2008), the styles and practices that young people absorb from globalised 'gangsta' culture tend to be preposterous caricatures of human behaviour in which gang violence is exaggerated and looped between real and virtual worlds of the imagined and the experienced (Ferrell, Hayward and Young 2015). The balance of interests, data protection and information sharing is complex, and the interests of victims can be forgotten when other, more powerful interests are activated. Therefore, the forthcoming Modern Slavery Bill should enshrine the best interests of victims as the primary consideration in all decisions, particularly in accessing and analysing technological and commercial data.

2. **How effective is the UK's approach to discouraging the demand that leads to trafficking?**

    In England, gang policy is evolving, and it is fair to say that before 2011 little reference is made to gangs in policy in England and Wales. The Modern Slavery Act was introduced in 2015 to tackle modern slavery in England and Wales. Although this was not drafted with specific county lines offences in mind, it provides law enforcement agencies with some opportunities to address modern slavery offences. Penalties include a maximum life sentence for perpetrators, and the Act provides enhanced protection for victims.

    According to the Independent Review of the Modern Slavery Act 2015 (2019) too few convictions are being handed down for the new offences prosecuted under the Act. Accordingly, the number of prosecutions would increase if clear offences relating to human trafficking in modern slavery had greater applicability to county lines methodologies in new or amended legislation. For example, new offences relating to cuckooing (the taking over of residences to sell drugs) could be proscribed in legislation; moreover, a reckless element to offending could be introduced to amend the existing required proof of knowledge of vulnerability.

    There are some reports from practitioners of desired individual and general deterrent effects when the label of child trafficker is applied by such sentencing (Andell forthcoming). The longer-term effects of such sentencing philosophies may need further consideration also to enable rehabilitation interventions and eventual re-entry into the community to take place. The opportunities for regular joint reviews of convicted prisoners by prison and probation staff should be specified for sentence planning in anticipation of increases of convictions which attract substantial prison sentences.

    Despite increasing numbers of investigations since April 2016 and March 2021, there has only been 191 prosecutions for Modern Slavery in England and Wales in which the victim was a child, and of those prosecutions, only 95 convictions (Office for National Statistics 2022). The poor identification, detection and conviction rates highlight the need not only for better definition of offences but also for improved processes outlined by criminal justice and welfare policy.

3. **To what extent do support services meet the needs of victims who have been trafficked in or to the UK?**

    Young people are often known to Children's Services and Youth Offending Teams, but because their absences from home and school are usually fairly brief (particularly since lockdown), they may not be reported to Safeguarding professionals or the Police (Sturrock & Holmes, 2015) and do not always appear to meet the threshold for longer-term interventions (The Child Practice Safeguarding Review Panel 2020). Gang elders use children and younger adolescents to keep themselves at a distance from risk of prosecution (Pitts 2011, Maitra 2017) because they are easier to control and, being young and having few or no, previous convictions, they are less likely to be known to the police (Andell and Pitts 2018). Often, the attraction of gang association for vulnerable young people is a sense of belonging or "bonding capital" (Andell 2019). Marshall (2023) argues that our current responses to CCE can embed young people in the criminal justice system rather than assisting their diversion. She further argues that this is mainly due to the current inadequacies of the tools available to respond to CCE as an issue of victimisation; and the subsequent criminalisation of young people who are caught short of ideal victimhood.

    Current studies (Andell forthcoming) and those of other UK and North American researchers suggest that most young people living in gang-affected neighbourhoods are likely to know and to associate with young people affiliated with local gangs. (Hagedorn, 1998, 2008; Youth

Justice Board, 2007; Klein, 2008; Pitts, 2008; Andell & Pitts, 2010 Andell, 2019). However, gang 'association' is not the same thing as gang 'membership'. Many young people will associate with gangs/gang members, but this does not mean that they are necessarily involved in the associated gang crime or gang violence (Andell 2019; 2020). These studies also indicate that many children and young people living in gang-affected neighbourhoods will, at some point, come under pressure from their local gang to comply with requests to be involved in gang activities, such as storing weapons or drugs or may be tempted by friends or associates with the lure of "easy money" to deal drugs, sometimes in far off locations (Hagedorn, 1998, Youth Justice Board, 2007, Pitts, 2008, Beckett (et al) 2013 Andell 2023). For the majority of young people in gang-affected neighbourhoods, relatively few are involved in gang crime; association with gang members is a means of securing a degree of safety in a high-risk situation. This 'strategic positioning' by young people in gang-affected neighbourhoods to keep safe was a main finding of research undertaken by Pitts in London boroughs between 2006 and 2009 (Pitts, 2006, 2007, 2008, Matthews & Pitts, 2007). This close association between gang-involved and non-gang-involved children and young people is also evident in research for the Children's Commissioner in six sites across England (Beckett et al., 2013). Because of this proximity and the pressures exerted, preventative measures must be available to young people at risk of exploitation.

Preventative interventions as part of a comprehensive strategic model (Grossman 1998) often arrives too little too late and is in the wrong place at the wrong time (Andell 2019). However, according to the National Youth Agency (2020) where street-based youth work in affected neighbourhoods has been sustained, it can help young people known to be involved or vulnerable to gangs make decisions to steer a different course. At it's core, youth work relies upon the building of helping relationships which assist young people to make informed choices to withstand the kinds of pressure outlined and to find alternative means of survival in such situations (Harris and Seal 2023, Smart 2023). From current research (Andell forthcoming) it has been observed that youth and community work overly relies on short-term contracted work from voluntary sector organisations who are often pitted against each other to compete for themed work. This brings challenges of embedding sustainable youth and community services in the communities that need them most (Davies 2018, Jeffs and Smith 2008). Perhaps a more sensible way forward would be to place a new statutory duty on local authorities to provide youth and community work as part of a whole system multi-agency approach to violence prevention through community development approaches. This would involve a permanent workforce with JNC-qualified youth and community workers based in the most affected areas. Such a service would work towards the best interests of the child as the primary consideration in all decisions, provide specialist care services for all child victims, utilise peer work to assist with making informed choices, contain a mediation element able to exit young people from high-risk situations,

4. **What evidence is there, if any, that the National Referral Mechanism process is being exploited by individuals seeking asylum in the UK? I have little relevant evidence to respond to this question.**

5. **How can legislation, including the Modern Slavery Act 2015, policy and criminal justice system practice be improved to prevent and address human trafficking?**
    As argued above, further clarity is needed in both primary legislation and in accompanying guidance for criminal justice processes as part of amendments to the Modern Slavery Act. The Modern Slavery Act should specifically target both the organisers of county lines networks and those whom they exploit. Adults who utilise children, young people or vulnerable adults to

distribute drugs should face charges of human trafficking, and therefore, the processes involved in investigations and charging should be clarified by amendments to the Act and further guidance given to prevent current and future victimisation.

1. Specifically, clarity is needed on the legal categorisation of the activities involved in human trafficking, criminal exploitation and modern slavery as they relate to county lines drug networks and "local organised crime" groups.

2. All criminal justice recording systems should accurately flag county lines and modern slavery behaviours and offences.

3. The Code for Crown Prosecutors in county lines exploitation cases should be revised in line with specified definitions and offences. The Code should further clarify precisely what requirements there are on defendants and prosecutors when considering and deploying the statutory defence.

4. The NRM process needs further development to ensure the timely identification of potential victims of modern slavery. Directives embedded in legislation could facilitate more localised assessment mechanisms.

5. NRM mechanisms should ensure that assessments of victimhood are based on all relevant factors and should also provide recommendations for on going support to reduce the likelihood of further victimisation.

6. Guidance should be issued on the types of evidence expert witnesses rely on in county lines cases to ensure impartial views.

7. Further provision needs to be available for vulnerable women and girls, both in designing prevention and in enforcement responses which should foreground coercive control as a criminogenic factor in investigations (see above).

8. The forthcoming Modern Slavery Bill should enshrine the best interests of victims as the primary consideration in all decisions.

9. New offences should be created in relating to cuckooing (the taking over of residences to sell drugs) and should be proscribed in the Modern Slavery Bill.

10. A reckless element to offending in the Modern Slavery Bill should be introduced to amend the existing required proof of knowledge of vulnerability.

11. Sentencing philosophies need further explanation in the Modern Slavery Bill.

12. Considerations to national standards to enable rehabilitative interventions by Community Offender Managers and Prison Offender Managers to work jointly in sentence planning.

13. A new statutory duty on local authorities to provide youth and community work as part of a whole system multi-agency approach should be specified in the Modern Slavery Bill.

Appendix 2 Selected References

Andell, P. (forthcoming) Co-production in Addressing Child Criminal Exploitation, Final Report of the British Academy Innovation Fellowship.

Andell, P. (2019) *Thinking Seriously About Gangs. Towards A Critical Realist Approach*. London, Palgrave.

Andell, P. (2019) Addressing County Lines: Praxis for Community Safety Practitioners. *Safer Communities:* London, Emerald. ISSN: 1757-8043

Andell, P. (2020) 'Gangs Violence and County lines' in Lane et al (Eds): *International Handbook on Collective Violence: Current Issues and Perspectives,* Routledge.

Andell P. (2023) Criminal and Sexual Exploitation in County Lines: Voices from Affected Communities in Andell,P. and Pitts, J. *The Palgrave Handbook of UK Youth Gangs*. London, Palgrave.

Andell, P. and Pitts, J. (2018) The End of the Line? The Impact of County Lines Drug Distribution on Youth Crime in a Target Destination. *Youth and Polic*y.
https://www.youthandpolicy.org/articles/the-end-of-the-line/
(Accessed 14 March 2023)

Andell, P. and Pitts, J. (2017) Preventing the violent and sexual victimisation of vulnerable gang-involved and gang-affected children and young people in Ipswich. Suffolk: University of Suffolk.
https://www.drugsandalcohol.ie/27822/
(Accessed 7 March 2023).

Archer, M. (2003) *Structure, Agency and Internal Conversation*, Cambridge University Press.

Barron L. (2013) The sound of street corner society: UK grime music as ethnography. *European Journal of Cultural Studies*. Vol 16 Issue 5.

Beckett H. Brodie I. Factor F. Melrose M. Pearce J. Pitts J. Shuker L. & Warrington C. (2013) It's wrong but you get used to it, London, *The Children's Commissioner*.

Biderman, A. D and Reiss, A. J. (1967) On Exploring the "Dark Figure" of Crime. *The Annals of the American Academy of Political and Social Science*. London, Sage Vol. 374, Combating Crime pp. 1-15.

Centre for Social Justice and Justice Care (2022) *Slavery at Home: a new bill to tackle slavery in Britain*.
https://www.centreforsocialjustice.org.uk/wp-content/uploads/2023/02/Slavery-at-Home-a-new-bill-to-tackle-slavery-in-Britain.pdf
(Accessed 7 March 2023)

Coomber, R. (2015) 'A tale of two cities: understanding differences in levels of heroin/crack market related violence — a two city comparison', Criminal Justice Review, 40(1): 7-31.

Crawford, A. & L'Hoiry, X. (2017) Boundary crossing: networked policing and emergent 'communities of practice' in safeguarding children. *Policing and Society*, Vol 27.
https://www.tandfonline.com/doi/full/10.1080/10439463.2017.1341508
(Accessed 7 March 2023).

Curtis R. & Wendel T. (2014) Toward the development of a typology of illegal drug markets, John Jay College NYC, Crime Prevention Studies, Vol. 11, pp. 121-152.

Davies, B. (2018) *Austerity, Youth Policy and the Deconstruction of the Youth Service in England*. London Springer.

Densley J. & Harding S. (2018) Gangs in Europe, Oxford, Oxford Research Encyclopedia of Criminology and Criminal Justice.

Drugwise (2017) Shapiro H. Daly M., Highways and Buyways, A Snapshot of UK Drug Scenes. www.drugwise.org.uk/wp-content/uploads/Highwaysand buyways.pdf

ERSOU (2023) News: https://ersou.police.uk/news/2023/06/23/drug-and-firearm-dealing-trio-jailed-for-65-years/ (Accessed 9 August 2023).

Eubanks, K. (2017) After Blackness, Then Blackness: Afro-Pessimism, Black Life, and Classical Hip Hop as Counter-Performance. *The Journal of Hip Hop Studies*; Chicago Vol. 4, Iss. 1, (Fall 2017): 5-22.

Ferrel, J. Hayward, K. and Young, J. (2015) *Cultural Criminology, An Invitation*. Sage London.

Harding S. (2014) The Street Casino: Survival in Violent Street Gangs, Bristol, Policy Press.

Harding, S. (2020) *County Lines: Exploitation and Drug Dealing among Urban Street Gangs*. Bristol University Press.

Harris, P. and Seal, M. (2023) Youth Work and Gang Violence Reduction in Andell, P. and Pitts, J. *The Palgrave Handbook of UK Youth Gangs*. London, Palgrave.

HMI Constabulary (2015) 'In harm's way: The role of the police in keeping children safe', London; HMSO.

Hoque, A. (2018) Being Young, Male and Muslim in Luton. London: UCL Press.

Ilan J. (2015) *Understanding Street Culture Poverty, Crime, Youth and Cool*. Palgrave London.

Independent Review of the Modern Slavery Act 2015: Final Report (2019) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/ file/803406/Independent_review_of_the_Modern_Slavery_Act_-_final_report.pdf

Jeffs, A and Smith, M. [2008] 'Valuing Youth Work', Youth &Policy, 100:277-302

Latour, B., 2005. *Reassembling the Social: An Introduction to Actor-Network-Theory*. Oxford: Oxford UP.

Marshall, H. (2023) Victims first? Examining the place of 'child criminal exploitation' within 'child first' youth justice. *Children and Society*.

Murphy C et al (2022) Identifying Pathways to Support British Victims of Modern Slavery towards Safety and Recovery: *A Scoping Study*. https://modernslaverypec.org/assets/downloads/British-nationals-full-report.pdf (Accessed 13 March 2023)

National Crime Agency (2017) County Lines, Violence, Exploitation & Drug Supply 2017, London, National Crime Agency (NCA).

National Youth Agency (2020) Hidden in Plain Sight. Gangs and Exploitation. A Youth Work Response to Covid 19.
https://s3.eu-west-1.amazonaws.com/assets.nya2.joltrouter.net/wp-content/uploads/20210417221247/NYA-Hidden-in-Plain-Sight-1.pdf
(Accessed 7 March 2022).

Office for National Statistics (2022) Measuring the dark figure of crime.
https://www.adruk.org/our-mission/our-impact/measuring-the-dark-figure-of-crime-479/
(Accessed 7 March 2023)

Pitman J. (2023) in Webster R. *Women Who Offend As A Result Of Coercive Control*.
https://www.russellwebster.com/women-who-offend-as-a-result-of-coercive-control/
(Accessed 13 March 2023)

Pitts J. (2008) *Reluctant Gangsters: The Changing Face of Youth Crime*, London, Routledge/Willan Publishing.

Pitts J. (2012) Youth Crime and Criminal Victimisation amongst Somali Young People in Moss Side: *A Rapid Assessment Exercise*, Manchester, Greater Manchester Police.

Pitts J. (2013) Drifting into Trouble: Sexual Exploitation and Gang Affiliation, Melrose. M. & Pearce J., (ed) *Critical Perspectives on Child Sexual Exploitation and Related Trafficking*, London, Palgrave Macmillan.

Pitts J. (2016) Critical Realism and Gang Violence, Matthews R. (ed.) *What is to be Done About Crime and Punishment: Towards a Public Criminology*, London, Palgrave/Macmillan.

Radford, L., Aitken, R., Miller, P., Ellis, J., Roberts, J., and Firkic, A. (2011) Meeting the needs of children living with domestic violence in London Research report. London: NSPCC and Refuge.

Safeguarding_children_at_risk_from_criminal_exploitation_review.pdf
(Accessed 14 March 2922)

Smart, J. (2023) Using Ex-Gang Members as Peer Youth Workers in Andell,P. and Pitts, J. *The Palgrave Handbook of UK Youth Gangs*. London, Palgrave.

Sturrock R. & Holmes L. (2015) Running the Risks: The links between gang involvement and young people going missing, London Catch 22 and Missing People.

Stone, N. (2018). Child Criminal Exploitation: 'County Lines', Trafficking and Cuckooing. *Youth Justice*, 18(3), 285–293.
https://doi.org/10.1177/1473225418810833

Sergi, A. (2017) *From Mafia to Organised Crime: A Comparative Analysis of Policing Models*. Cham, Switzerland. Springer International.

The Child Practice Safeguarding Review Panel (2020) It was hard to escape Safeguarding children at risk from criminal exploitation.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/870035/

UN Sustainable Development Goals.
https://sdgs.un.org/topics/violence-against-children
(Accessed 13 March 2023)

Windle J. & Briggs D. (2015) 'It's like working away for two weeks', The Harms Associated with Young Drug Dealers Commuting from a Saturated London Drug Market, *Crime Prevention and Community Safety*, 17.

Whittaker, A. and Harvard, T. (2023) Reluctant Gangsters Revisited in Andell, P. and Pitts, J. *The Palgrave Handbook of UK Youth Gangs*. London, Palgrave.

Youth Justice Board (2007) Groups, Gangs and Weapons, London, Youth Justice Board.

Youth Justice Board (2019) Youth Justice Board for England and Wales Strategic Plan 2019-2022.
ttps://www.gov.uk/government/publications/youth-justice-board-for-england-and-wales-strategic-plan-2019-22
(Accessed 24 March 2023)

Appendix 3

Signalling Events and Civil Orders.

The report mentions incidents of violence and exploitation of vulnerable people. Slovic (1992) and Innes & Fielding (2002) describe these events as signal crimes. If a robust official response does not meet a signal event, potential perpetrators may conclude that there is a diminished risk of apprehension, and the signal event may cause an escalation in the seriousness of these crimes. The approach of the Home Office (Cullenet et al., 2016) suggests that a strong message is sent to those exploiting children (possibly via digital media) forbidding the use of children and vulnerable adults for drug dealing. The messaging would inform the groups involved that breaking this 'rule' will lead to intensive multi-agency enforcement activity against ALL members of the group for ALL offences committed. This would entail engaging affected communities to explain the approach and would ensure that the first group to break the 'rule' is subjected to a tough response as promised.

Civil orders can assist in responses, and disruptions can be carried out by applying such orders. Various civil orders are available which can restrict activities in specified areas of groups or individuals, which can also make human resources "too hot to handle" for potential exploiters. When applied post-conviction to exploiters, they can also reduce the cultural capital of individuals or impact street kudos by replacing the conferred label of a "drug dealer" with that of a "modern slaver". Civil orders should be subject to regular review and can assist in preventative or rehabilitation plans, subject to agreed behaviours.

Risk and Prevention Orders

The main civil orders are Slavery & Trafficking Prevention Orders (STPOs) and Slavery and Trafficking Risk Orders (STROs), which enable courts to restrict the activities of individuals believed to be at risk of modern slavery offending. The National County Lines Coordination Centre (NCLCC) 'Orders Team' assist and advise on the appropriate use and application for these orders. The Orders Team reviews investigations and advises on charging for modern slavery offences. It was reported in practice guidelines (Mulholland, 2023. Unpublished) that:

> In county lines and drug investigations, we frequently see clear signs of exploitation, often of young and vulnerable people, and civil orders can be a really useful way of protecting those being exploited and restricting the activities of suspected or known criminals.

The practice guidelines state:

> The standard of proof required for such orders is an enhanced civil standard of proof, like the criminal standard of proof of being sure beyond a reasonable doubt. STPOs can be made on convicted or cautioned people who have previously been involved in slavery or human trafficking offending, or equivalent offences, abroad. STROs can be made on those at risk of offending, where an order is considered necessary to protect against the risk of harm to others from the defendant committing the offence. It is suggested that they could be considered a risk management tool for suspects presenting a criminal exploitation risk to others. Unlike a STPO, they do not require a conviction or a failed conviction. In addition, Interim orders can be applied for if the decision on the application has not yet been determined. Interim STRO's can be used as an additional management tool during ongoing criminal investigations in addition to, or as alternative to, bail conditions.

Appendix 4

Strategic Tool for Addressing Organised Crime and Reducing Harms in the Supply and Demand of Illegal Drugs.

4 Ps Model	Community Harm Reduction Model	Themes and Activities
Pursue	Enforcement	Intelligence, Targeted enforcement
Prevent	Situational Prevention	Neighbourhood policing, CCTV, Neighbourhood design, NOMS monitoring, Housing, Civil Orders
Protect	Social Prevention	Early help, Youth and social work, YOS, Gang exit, Drug Treatment, CAMs, Through and Aftercare, VRU case work
Prepare	Community Development	Youth and Community work, VRU Business and Community Meetings, Councillor drop ins and local meetings

Appendix 4 Report References

Aldridge, J., Garius, L., Spicer, J., Harris, M., Moore, K. & Eastwood, N. (2021) *Drugs in the Time of COVID: The UK Drug Market Response to Lockdown Restrictions*, London: Release.

Andell, P. & Pitts, J. (2009). *West Yorkshire Gangs Study*, West Yorkshire Police.

Andell, P., & Pitts, J. (2013). Developing the Lambeth Gangs Strategy. *A Report for the Lambeth Gangs Unit*.

Andell, P. & Pitts J. (2018). The End of the Line? The impact of county lines drug distribution on youth crime in a target destination. *Youth & Policy*.

Andell, P. & Pitts, J. (2019). *Preventing the violent and sexual victimisation of vulnerable gang-involved and gang-affected children and young people in Ipswich* (1913160033).

Barter, C. & Renold, E. (1999) Social Research Update 25, The Use of Vignettes in Qualitative Research, The Department of Sociology, University of Surrey, Guildford

Black, C. (2020) Independent Review of Drugs: Phase One Report. Home Office.
https://www.gov.uk/government/publications/review-of-drugs-phase-one-report.

Bedfordshire Police (2023) Operation Costello.
https://www.beds.police.uk/police-forces/bedfordshire-police/areas/campaigns/campaigns/operation-costello/
(Accessed 8 August 2023).

Braga, A. A. (2008). Pulling levers focused deterrence strategies and the prevention of gun homicide. *Journal of Criminal Justice*, 36(4), 332-343.

Brewster, B., Robinson, G., Silverman, B.W. et al. Covid-19 and child criminal exploitation in the UK: implications of the pandemic for county lines. *Trends Organ Crime 2*6, 156–179 (2023).
https://doi.org/10.1007/s12117-021-09442-x
(Accessed 6 August 2023).

Brown, F. H. (2001) Relative Deprivation, Opportunity and Crime: A Study of Young Men's Motivations for Committing Burglary. *PhD Thesis LSE*.
http://etheses.lse.ac.uk/2421/1/U615370.pdf
(Accessed 15 May 2023).

Brown J. & Coombe C. (2015) The Cambridge Guide to Research in Language Teaching and Learning Edition: Cambridge: Cambridge University Press.

Buil-Gil, D. Pina-Sanchez, J.Brunton-Smith, I. & Cernat. A, (2022)

Bad Data, Worse Predictions, CREST Analytics.
https://crestresearch.ac.uk/comment/bad-data-worse-predictions #:~:text=All%20this%20results%20in%20what,offences%20and%2061%25%20for%20threats.
(Accessed 3 August 2023)

Byford, S. Barrett, B. Metrebian,N. Groshkova, T. Cary, N. Charles, V. Lintzeris, N. and Strang, J.(2013) Cost-effectiveness of injectable opioid treatment v. oral methadone for chronic heroin addiction. *The British Journal of Psychiatry* 203, 341–349.
https://web.archive.org/web/20190429092035id_/https://www.cambridge.org/core/services/aop-cambridge-core/content/view/34754ADCA3714FC662AB0D10D9D56E19/S0007125000053563a.pdf/div-class-title-cost-effectiveness-of-injectable-opioid-treatment-span-class-italic-v-span-oral-methadone-for-chronic-heroin-addiction-div.pdf
(Accessed 5 July 2023).

Caulkins, J. P. & Reuter, P. (2008). Towards a harm reduction approach to enforcement. Safer Communities, London: Emerald. Vol 8 Issue 1.

Child Safeguarding Practice Review Panel (2020) *It was Hard to Escape. Safeguarding children at risk from criminal exploitation*.

College of Policing (2023)
https://www.college.police.uk/support-forces/practices/clear-hold-build
(Accessed 18 July 2023)

Coomber, R., & Moyle, L. (2018). The Changing Shape of Street-Level Heroin and Crack Supply in England: Commuting, Holidaying and Cuckooing Drug Dealers Across 'County Lines'. *The British Journal of Criminology*, 58(6), 1323-1342.

Cox, P. (2015) Sexual assault and domestic violence in the context of co-occurrence and re-victimisation: State of knowledge paper.
https://d2rn9gno7zhxqg.cloudfront.net/wp-content/uploads/2019/02/19024823/embargoed-Landscapes-Sexual-assault-and-domestic-violence-in-the-context-of-co-occurrence-and-re-victimisation-1.pdf
(Accessed 6 August 2023).

Crime Rate (Beds 2023)
https://crimerate.co.uk/bedfordshire/luton
(Accessed 18 July 2023)

Dempsey M. (2021) Still not safe. The public health response to youth violence. *London. Report for the Children's Commissioner for England*.

Densley, J. A. (2012). The organisation of London's street gangs. *Global crime*, 13(1), 42-64.

Department of Health (2017) Drug misuse and dependence UK guidelines on clinical management
ttps://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/673978/clinical_guidelines_2017.pdf
(Accessed 13 July 2021)

Durham, A. (1972) Community Development and Community Relations in Northern Ireland. *Social Service Review*. Chicago:University of Chicago Press. Volume: 46, Issue: 2.

Farrow, K. (2022) Legitimacy & Confidence in Policing. *Cumberland Lodge Briefing*. Conference proceedings.
https://www.cumberlandlodge.ac.uk/sites/default/files/legitimacy_confidence_in_policing_-_briefing_document.pdf
(Accessed 18 July 2023)

Finch, J. (1987) The Vignette Technique in Survey Research, *Sociology*, 21, pp.105-14

Firmin C (2018) 'Safeguarding children and young people from sexual exploitation, gang-association and associated vulnerabilities: a briefing for Inspectorates'. Contextual Safeguarding Network.

Firmin, C. (2020). Contextual safeguarding and child protection: Rewriting the rules. Taylor & Francis.

Firmin, C. and Lloyd, J. (2020). 'No Further Action: Contextualising Social Care Decisions for Children Victimised in Extra-Familial Settings', *Youth Justice*, 20(1-2), pp. 79-92.

Fraser, A., & Hagedorn, J. M. (2018). Gangs and a global sociological imagination. *Theoretical criminology*, 22(1), 42-62.

Gray K (2021) Identification and Safeguarding of Vulnerable People Linked to County Lines. Clarifications, Benefits and Suggested Good Practice. *National Briefing Paper*.

Harding, S. (2014). *Street Casino: Survival in violent street gangs*. Policy Press.

Harding, S. (2020). Getting to the Point? Reframing Narratives on Knife Crime. *Youth Justice*, 20(1-2), 31-49.

Hall, B. Khan, R. & Eslea, M. (2022) *County Lines & Criminal Exploitation of UK University Students. Centre for Criminal Justice and Partnerships*. RESOLVE. University of Central Lancashire.

Havard, T. (2022) Serious youth violence: County lines drug dealing and the Government response. House of Commons Library.
https://researchbriefings.files.parliament.uk/documents/CBP-9264/CBP-9264.pdf
(Accessed 5 August 2023).

Hesketh, R. F., & Robinson, G. (2019). Grafting: "the boyz" just doing business? Deviant entrepreneurship in street gangs. Safer Communities.

Heeks, M., Reed, S. Mariam, T. and Prince, S. (2018) The economic and social costs of crime Second edition Home Office Research Report 99.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/954485/the-economic-and-social-costs-of-crime-horr99.pdf
(Accessed 3 August 2023)

HMIC (2016) Police Legitimacy Bedfordshire.
https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/peel-police-legitimacy-2015-bedfordshire.pdf
(Accessed 19 July 2023).

HMIFRS (2022) The police and National Crime Agency's response to vulnerable people in 'county lines' drug offending.
https://www.justiceinspectorates.gov.uk/hmicfrs/publication-html/both-sides-of-the-coin-county-lines/#county-lines-intelligence-collection-matrix
(Accessed 7 August 2023).

HMIFRS (2023) An inspection of the eastern regional response to serious and organised crime.
https://www.justiceinspectorates.gov.uk/hmicfrs/publication-html/inspection-of-the-eastern-regional-response-to-serious-and-organised-crime/#regional-findings
Accessed 6 August 2023).

HMICFRS (2023) PEEL 2021/22 Police effectiveness, efficiency and legitimacy. An inspection of Bedfordshire Police.
https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/peel-assessment-2021-22-bedfordshire.pdf
(Accessed 18 July 2022).

Home Affairs Committee (2023) Oral evidence: Drugs, HC 198 Wednesday 22nd February 2023.
https://committees.parliament.uk/oralevidence/12703/pdf/
(Accessed 23 June 2023).

Home Office (2014) Ending Gang and Youth Violence Community Engagement.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/318551/EndingGangYouthViolenceCommunityEngagement.pdf
(Accessed 1 August 2023).

Home Office (2018) Serious and Organised Crime Strategy.
https://www.gov.uk/government/publications/serious-and-organised-crime-strategy-2018
(Accessed 31st July 2023.)

Home Office (2018) National Summary and Emerging Best Practice Findings of the Home Office Violence and Vulnerability Unit, May 2018, London, Home Office

Home Office (2021) Beating Crime Plan. Fewer victims, peaceful neighbourhoods, safe country.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015382/Crime-plan-v10.pdf
(Accessed 5 August 2021).

Home Office (2023) Clear, Hold, Build.
https://www.gov.uk/government/news/government-announces-crackdown-against-organised-criminal-gangs
(Accessed 19th July 2023).

ITV X (2023) Warning over highly toxic batch of drugs after two people found dead in Essex.
https://www.itv.com/news/anglia/2023-06-14/warning-over-highly-toxic-batch-of-drugs-after-two-deaths
(Accessed 27 August 2023)

Kolb, D. A. (1984). Experiential learning: Experience as the source of learning and development. Englewood Cliffs, N.J: Prentice-Hall.

Lea, J., & Young, J. (1984). What is to be done about law and order. Harmondsworth, England: Penguin.

Lewin, K. (1946) Action Research and Minority Problems. Journal of Social Issues, 2, 34-46.

My Luton (2022)
https://m.luton.gov.uk/Page/Show/news/Pages/What-the-2021-Census-tells-us-about-Luton-.aspx
(Accessed 14th July2023)

Minatti, W. & Duyvesteyn, I. (2019): Concepts of Legitimacy: Congruence and Divergence in the Afghan Conflict, Civil Wars.
https://doi.org/10.1080/13698249.2020.1686876
(Accessed 18 July 2023).

McManus, J. & Andell, P. (2002) Addressing Local Drug Markets. *Safer Communities*. London: Emerald Publishing.

National Crime Agency (2016, 2017, 2018). County Lines Gang Violence, Exploitation & Drug Supply. N. C. Agency.

National Crime Agency (2019) NCA, County lines drug supply, vulnerability and harm 2019, January 2019, https://www.nationalcrimeagency.gov.uk/who-we-are/publications/257-county-lines-drug-supply-vulnerability-and-harm-2018/file
(Accessed 5 August 2023).

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

NCLCC (2021) County Lines Strategic Assessment 2020/21.
https://pdf4pro.com/amp/view/nclcc-county-lines-strategic-assessment-2020-21-7754ac.html
(Accessed 5 August 2023).

ONS (2022) Sexual offences prevalence and trends, England and Wales: year ending March 2022.
https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/sexualoffencesprevalenceandtrendsenglandandwales/yearendingmarch2022#:~:text=The%20police%20recorded%20193%2C566%20sexual,the%20year%20ending%20March%202020
(Accessed 6 August 2023).

ONS (2023) Recorded crime data by Community Safety Partnership area.
https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedatabycommunitysafetypartnershiparea
(Accessed 3 August 2023).

ONS (2023*) Crime in England and Wales QMI.
https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/methodologies/crimeinenglandandwalesqmi
(Accessed 8 August 2023).

Pawson, R., & Tilley, N. (1997). *Realistic evaluation*. Sage.

Pitts, J. (2007). Reluctant gangsters: Youth gangs in Waltham Forest.
https://www.wfcw.org/docs/reluctant-gangsters.pdf
(Accessed 27 August 2023).

Pitts, J. (2012) Reluctant Criminologists: Criminology, Ideology and the Violent Youth Gang. Youth and Policy.
https://www.youthandpolicy.org/wp-content/uploads/2017/06/pitts_reluctant_criminologists.pdf
(Accessed 27 August 2023).

Pitts, J. (2016). Critical Realism and Gang Violence. In R. Matthews (Ed.), *What is to Be Done About Crime and Punishment?* (pp. 57-88). Palgrave Macmillan.

Pitts, J. (2019). The evolution of the English street gang. *Safer Communities*. London: Emerald Publishing.

Pitts J. (2021) County Lines. *HM Inspectorate Of Probation*. Academic Insights.

Pitts, J. Hope, T. Hurley, M. McGibbon, I. (2017) Preventing Serious Organised Crime.
https://uobrep.openrepository.com/handle/10547/623170
(Accessed 6 August 2023).

Plumplot (2023) Violent Crime in Bedfordshire.
https://www.plumplot.co.uk/Bedfordshire-violent-crime-statistics.html#:~:text=Annual%20crime%20rate%20in%20Bedfordshire,crimes%20reported%20in%20the%20county
(Accessed 3 August 2023).

Police UK (2023) Compare Your Area.
https://www.police.uk/pu/your-area/bedfordshire-police/performance/compare-your-area/?tc=NU2
(Accessed 5 August 2023).

Turning Point (2023) Heroin contaminated with synthetic substances.
https://www.suffolkuserforum.co.uk/heroin-contaminated-with-synthetic-substances-confirmed-case-in-suffolk/
(Accessed 27 June 2023).

Thornton, S. (2021) Independent Anti-slavery Commissioners annual report (2020-2021)

Ucko, D (2013) Beyond Clear-Hold-Build: Rethinking Local-Level Counterinsurgency after Afghanistan Contemporary Security Policy 34(3).
https://www.researchgate.net/publication/263081646_Beyond_Clear-Hold-Build_Rethinking_Local Level_Counterinsurgency_after_Afghanistan
(Accessed 18 July 2023)

Wacquant, L. (2007) Territorial Stigmatization in the Age of Advanced Marginality, Thesis Eleven, 91. (cited in James Rhodes (2011) *Stigma, Space and Boundaries in De-industrial Burnley. Ethnic and Racial Studies*.
https://hal.science/hal-00713343/document
(Accessed 2nd August 2023).

Webber, C. (2022) Rediscovering the Relative Deprivation and Crime Debate: Tracking its Fortunes from Left Realism to the Precariat. Critical Criminology 30, 321–347.
https://doi.org/10.1007/s10612-021-09554-4
(Accessed 10 May 2023).

Young, T., Fitzgerald, M., Hallsworth, S., & Joseph, I. (2007). Groups, gangs and weapons: A Report for the Youth Justice Board of England and Wales.

Young, J. (2003). To these Wet and Windy Shores: Recent Immigration Policy in the UK. *Punishment & Society*, 5(4), 449–462. https://doi.org/10.1177/14624745030054005

Young J (2003) Merton with energy, Katz with structure: The sociology of vindictiveness and the criminology of transgression. *Theoretical Criminology* 7(3): 389–414.