

CYPM25B Action for Children

Senedd Cymru | Welsh Parliament

Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and Education Committee

Plant a phobl ifanc sydd ar yr ymylon | Children and Young People on the margins

Mate gan Gweithredu dros Blant | Evidence from Action for Children

Action for Children provides a range of services to children across Wales, including residential care, fostering, transition from care support, and criminal exploitation diversion services.

Nature and Scale of Missing Children: An analysis of our serious organised crime early intervention services in South and North Wales revealed that missing episodes contributed significantly to concerns noted in referral information to the service, contributing to children being criminally exploited. **63%** of our current cohort in Flintshire has experienced recorded missing episodes (data collected between November 2023 and March 2024 from case files/referral information). Additionally, out of 119 supported from 2020–2023 **70%** of young people in our Cardiff service have had similar concerns noted. Among this group, there were **140 incidents** before referral to our service, which reduced to **85 incidents** post-referral. Our residential services also highlight missing episodes as a significant concern, with associated risks such as substance misuse, sexual abuse, exploitation, violence, and emotional/mental well-being. It's important to note that statistically, young people who have gone missing from home or care may have multiple episodes, with each incident recorded individually.

At-Risk Groups: We recognise that looked-after young people and those at risk of or being criminally exploited are particularly vulnerable to missing episodes. These incidents often serve as indicators of exploitation or county lines activity. As part of our referral criteria for the Serious Organised Crime

Early Intervention service, we consider missing episodes. Looked-after children are often targeted due to their perceived accessibility and greater vulnerabilities. Additionally, children not engaged in education face increased risks, as they may be dealing with broader challenges such as family relationship breakdowns, emotional or mental difficulties, and offending behaviour.

Practice: Reporting thresholds for missing children can vary across agencies. Consequently, some children may be missing from home without being reported, while others in care settings may be reported more frequently in line with organisational policies.

Impact of Return Interviews on Children: The manner in which return interviews are conducted can significantly influence the subsequent engagement and support provided to children. Some children may hesitate to disclose information to the police or statutory services due to fear of consequences. Therefore, it is crucial to consider the timing and setting of these interviews. Ideally, they should take place at a time and in a space where children feel comfortable, preferably with a trusted adult present.

Policy Considerations: While the National Practice Framework Missing Standards is a positive step, there is room for improvement. A more child-focused and welfare-based approach would enhance its effectiveness. Additionally, training related to extra-familial harm and contextual safeguarding strategies could strengthen the framework's implementation. Furthermore, emphasising the necessity of return interviews, while using professional judgment to avoid unnecessary escalation, would be beneficial.

Background

Action for Children delivers services to support children who are at risk of, or from, criminal exploitation. Since 2012, its Serious Organised Crime Early Intervention Service (SOCIES) has helped children at risk in eight areas of the UK, including Glasgow, Edinburgh, Newcastle, Flintshire and Cardiff. In 2020 Action for Children has delivered the service in Cardiff, and more recently

expanded to Flintshire in November 2023. In each area work was carried out to determine the feasibility and requirement for a criminal exploitation diversion service through consultation with key strategic stakeholders. This work determined the need, threat types, partnership working arrangements and ensuring there would be not duplication of effort across agencies. Action for Children came to Cardiff and Flintshire with a significant evidence base of successful delivery having delivered services in Scotland since 2012.

Understanding Child Criminal Exploitation: The recent **Jay Review** highlighted a significant challenge across the UK: comprehending the **nature, scale, and extent of child criminal exploitation (CCE)**. This challenge partly stems from the lack of a clear legal definition and inconsistent methods of recording data related to CCE. Without a precise definition or measurable evidence to gauge the problem's magnitude, individual agencies often rely on manual record-keeping.

Action for Children initiated an evaluation to support the **National Lottery-funded proof-of-concept rollout** across four UK sites: Cardiff, Newcastle, Edinburgh, and Dundee. As part of this evaluation, they explored the feasibility of using police data to assess the impact of the **SOCEIS service**. The resulting report highlighted challenges in understanding the issue's impact and scale using police data. Recommendations included enhancing data sharing practices and adopting a more robust approach to data collection. While police systems currently provide consistent insights into the nature and scale of the problem, there are challenges associated with this approach. It may not be the most effective data collection method, and there is an over-reliance on police data to identify criminally exploited children. By the time children are identified by the police, it could be argued that it is already too late, as they may have already been criminalised

Evaluation of SOCEIS Impact: The attached evaluation provides insights into the impact of the **UK proof of concept** funded by the **National Lottery Community Fund**. Since 2020, **Action for Children** has supported a total

of **248 children** across **four sites** between July 2020 and January 2023. The average age of these children was **15**, and the majority were male.

Exploitation of Children: The methods of exploitation vary widely, but most children are drawn into activities such as **drug dealing and distribution, burglary, violence, disorder offences, and motor offences**. Many of these children carry weapons, either because they are instructed to do so by exploiters or for their own safety. During sessions, children often wear stab-proof vests, reflecting their sense of vulnerability within their local communities. In **Flintshire**, early evidence suggests that children are particularly impacted by **County Lines activity**, with connections to **Merseyside, Liverpool, and Manchester**. Meanwhile, in **Cardiff**, high levels of violence and gang-related rivalry have persisted over the four years of service delivery, with local organised crime groups managing operations within the area. Although some children are trafficked out of Cardiff via County Lines, the majority of exploitation occurs within the city itself.

Vulnerable Groups and Exploitation: Extensive evidence shows that organised crime groups exploit vulnerable populations for criminal or financial gain. While all children can be potential targets, certain vulnerabilities increase the likelihood of exploitation. These vulnerabilities include disengagement from education, living in poverty, having family members involved in serious organised crime, low self-esteem, substance misuse issues, and neurodiversity.

Given their age and developmental stage, all children are inherently at risk. The growing time children spend in online spaces and within their communities further amplifies this risk. Professionals face a significant challenge in identifying at-risk individuals, especially in spaces lacking supervision or adult oversight. Exploiters continually evolve their methods to access children discreetly and avoid detection. Consequently, it is accurate to assert that **all children are at risk**.

Raising awareness about vulnerabilities and recognising warning indicators could facilitate earlier identification and prevention efforts. However, without

a national strategy or legal definition, achieving a coordinated approach to combat this issue remains challenging.

Practice Overview: The SOCEIS service focuses on identifying children at risk of or being exploited into criminal activities through serious organised crime. By providing **1:1 support, family assistance, group work, and peer mentoring**, the service aims to address vulnerabilities that make children susceptible to exploitation. The ultimate goal is to build resilience and reduce risks, steering them toward more positive life paths.

Service Success in Cardiff: Our SOCEIS service successfully delivered a **proof of concept** in Cardiff. It is now sustained by the Shared Prosperity Fund through Cardiff Council. Service data from **Cardiff University's 2023 evaluation** underscores the effectiveness of the service (attached reports). Here are the key findings:

1. Closed Cases (Sample of 30):

- **77%** experienced reduced offending.
- **Two-thirds** showed a reduction in exploitation.
- **63%** improved their decision-making regarding risk.
- **Two-fifths** enhanced engagement with education, employment, or training.
- **Two-thirds** reported improved family relationships.

2. Open Cases (Sample of 18):

- **82%** reduced their offending behavior.
- **Most** of the 16–18 age group achieved positive outcomes (such as training, education, employment, and sustained family relationships).
- **63%** developed better risk assessment skills.
- **63%** reported improved family relationships.

These results highlight the significant impact of the SOCEIS service in supporting vulnerable children and steering them toward positive trajectories.

Through Shared Prosperity Funding in **Flintshire** we have recently implemented our SOCEIS service and identified from our current cohort (**15 children**)

- 100% have reported relationship difficulties.
- 63% have had missing episodes.
- 100% have had a school exclusion.
- 87% have displayed aggression.
- 75% have historically had poor engagement with services.
- 40% are care experienced.
- 56% have witnessed Domestic Violence.
- 56% carry weapons.
- 94% have been found in possession of unexplained money or drugs.
- 57% are not in education, employment or training (NEET)20% are registered in alternative education, whilst only 17% are registered in mainstream school.
- 62% have had a parent in prison.

Devolved and UK Powers

Our recent review, the **Jay Review: “Shattered Lives, Stolen Futures” (2024)**, draws insights from a diverse group of 70 witnesses. These witnesses include representatives from agencies supporting children and families, political figures, children themselves, and individuals with lived experiences. The attached report delves into the challenges faced by nations in identifying and responding to exploited children. One significant hurdle is the lack of

cohesive national coordination through a unified strategy and legal definition.

Action for Children, in collaboration with **Cardiff University**, is currently conducting a pilot study across our services in **Flintshire** and **Cardiff**. The aim is to assess the adequacy and appropriateness of existing legislation and practice guidance in safeguarding criminally exploited children. Our research examines how consistent responses to these vulnerable children can be facilitated across various sectors: children's services, education, health, housing, police, youth justice, and youth work.

Our ambition is to leverage the evidence and insights gained from this pilot to make informed recommendations to the **Welsh Government** and the local authorities involved. By improving policy and practice, we aspire to create a safer environment for these children. The pilot is ongoing and is scheduled to conclude in **October 2024**.

The attached documentation will offer further details about Action for Children's work in practice and policy. Action for Children welcomes the opportunity to discuss and consider the findings/recommendations of the Jay Review as well as our SOCEIS evaluation.

About us

Action for Children is a trusted national charity dedicated to protecting and supporting children and young people by providing practical and emotional care. With a history of over 150 years, we have consistently delivered services and advocated for improvements in children's lives, ensuring their voices are heard and considered in policy development and service delivery.

We currently operate 426 services across Scotland, Wales, England, and Northern Ireland, reaching and supporting a total of 765,905 children in the year 2022/2023. Our core service areas include family support, care for children, support for disabled children, and mental health and wellbeing

services. In addition to these core services, we offer specialised programs such as our Criminal Exploitation Intervention service.

Having started our support for criminally exploited children in Scotland in 2012, we expanded our reach to Wales and England in 2020. Over the past 12 years, we have continuously built on our expertise and understanding of this critical issue, always ensuring that the voices of those with lived experience are central to our work.

Our criminal exploitation intervention service supports children aged 11–18, and their families through intensive one to one sessions, risk reduction, group work, peer mentoring and diversionary activities. We work closely with partners in statutory and non–statutory settings to develop robust safeguarding and intervention plans that address the vulnerabilities that contribute to their exploitation, seeking ways to build engagement and resilience. We employ peer mentors with lived experience who act as positive role models to children who feel there is no way out.

This submission serves as additional supporting evidence to the oral presentation made to the committee on July 8, 2024. Our national report, titled 'Shattered Lives, Stolen Futures; The Jay Review of Criminally Exploited Children,'[1](#) further strengthens Action for Children's evidence base, with many of the report's themes reflecting the evidence and recommendations put forth in our work.

History

Since 2012 Action for Children have supported criminally exploited children, and their families. The development of practice since that time has been slower than desired, however some progress has been made. Children who we would now identify as criminally exploited were historically referred to as 'involved in serious organised crime', or 'engaged with serious organised crime' suggesting a level of choice around their involvement. In addition it was felt that children who were 'caught up' in this activity were likely to go onto to become exploiters themselves, avoid all engagement with agencies

and become part of the problem in later years. A different approach was required and in partnership with police Scotland and social work, Action for Children provided alternative support to children at risk of exploitation. We recognised the challenges these children faced in engaging with services. The fear they had around repercussions of trying to move away or share their concerns with authorities. We also knew there was an alternative way to support these children. That was to safeguard them, work alongside them and support them to see there was an alternative future for them. The role of lived experience plays a significant part in the services we offer. Positive role models that understand their experiences, can help them communicate their fears and lay down their hopes for the future enable a group of children once marginalized and written off by society to redirect their lives, move away from exploiters and build positive futures.

Across our 12 years of delivery in this area we have not only seen the devastating harms cause to children, young people and families but seen how their remarkable ability to thrive and build a positive future with support. We firmly advocate for the rights of exploited children to be upheld across the system. While we have made some progress much work remains to ensure that children can trust in our collective commitment to identifying, supporting and protecting them from harm.

The Criminal Exploitation of Children: Why our current response is not fit for purpose

The criminal Exploitation of children is a form of child abuse that has a significant physical and emotional trauma to tens of thousands of children across the UK. The trauma experienced through exploitation in the form of psychological distress, physical violence, family disruption, removal from their communities and criminalisation is significant, having life changing impacts on our children, young people and families.

Whilst there is a lot of good work achieved by statutory services, other charities, housing associations, police and other partners there is still a

growing concern about the number of children experiencing exploitation, and importantly, the system in place to support them.

Through our work we saw this impact on children, young people and families in delivering our services. We saw a willingness across partnerships to identify, intervene and respond to exploited children. Where this became challenging was when partnerships looked to the system to support them. In response to this challenge Action for Children realised our responsibility to do something on behalf of those we were supporting. We needed to understand this issue and gather the evidence of whether the system was supportive, or not, of our exploited children. In November 2023, Action for Children commissioned a review into the Criminal Exploitation of Children chaired by Professor Alexis Jay CBE, chair of the Independent Inquiry into Child Sexual Abuse. The full report has been submitted as evidence to this review.[1](#)

A further piece of research is currently being commissioned by Action for Children alongside CASCADE, Cardiff University considering the application of policy to practice. It is acknowledged that Wales has developed a response to criminally exploited children through a national toolkit, alongside adopting a shared definition with the Wales Safeguarding Procedures. Whilst these are positive steps, concern remained for Action for Children as to whether these were being adopted, as concerns around identification, intervention and response continued. The research findings have not yet been concluded however preliminary findings from 11 focus groups involving over 50 practitioners from a variety of agencies in South and North Wales and a nationwide survey suggest that;

- There is clear support for a legal definition of Criminally exploiting children
- There are mixed views on the National Referral Mechanism (NRM)
- The responses indicate a need for a better 18+ provision
- Working together with other local authorities appears to be a challenge

- There is scope to improve inter-agency collaboration, especially around information sharing
- The need for better funding across the whole sector

Data from the 116 survey responses highlighted that agencies felt formal training (70%) and policy and practice guidance (69%) were the two most important areas to influence their response to criminally exploited children. 78% of survey participants felt the All Wales Practice Guide: Safeguarding children from Child Criminal Exploitation supported them in responding to children alongside 69% regularly referring to the Social Services Wellbeing (Wales) Act 2015.

97% of participants felt that multi agency training was the best way to disseminate new policies or practice guidance, with only 41% suggesting written briefings.

A Childs Journey through Exploitation

The culmination of these issues results in children being harmed, criminalised and services struggling in how to respond in a way that promotes childrens rights and safeguards them from harm. The case study below illustrates daily challenges of agencies, partnerships and authorities in responding to the criminal exploitation of children.

Child A

- Child A has been referred to the service by police. He has come to their attention for drug dealing and distribution. He has been caught in possession of an offensive weapon, cannabis and has been charged with assault. This related to an incident where he claims he retaliated to someone that had robbed him of money previously. He is 15 years old.
- A is open to Children's Social Care as a Child in Need, and Youth Justice on a four month Referral order.

- A was referred to Action for Children due to his recent offences, disengagement with statutory agencies and concern his offending was escalating. The referral was not discussed with A as it was stated that he 'did not engage with agencies and his behaviour was deteriorating'. The language of the referral suggested that A was seen as firstly as an offender and choosing to be involved in this lifestyle.
- A had a history of trauma; family relationship breakdown, domestic violence, parental imprisonment and parental substance misuse
- It was suggested that the pathway into exploitation for A stemmed from his own substance misuse issues
- A had not attended school for over 7 months. He had been offered an alternative education package following permanent exclusion for disruptive behaviour. Prior to this he had received over 40 fixed term exclusions for disruptive behaviour, verbal abuse and drug and alcohol issues.
- His free time is largely spent in the community. There are concerns around his associates who are involved in criminality and substance misuse. A has no disposable income to fund his drug use yet appears to misuse regularly.
- Regular risk meetings would take place for A with relevant professionals in attendance. Concerns around his day to day routines were discussed, the unknowns around how he was funding his drug habit, risks to him and others as he had been carrying a weapon, and intelligence shared from police that there was risks to harm him from known nominals involved in organised crime as he had a drug debt to pay.
- A was living with family who were doing what they could to support him. They would report him missing and engage with social work and other services seeking to support them. At times when they would put

in boundaries A would become aggressive, leave the house and fail to return home overnight

- Multi agency assessments for A highlighted concerns that he was being criminally exploited, had an escalating issue with drug use and due to this was at physical risk of harm from organised crime nominals
- Youth Justice continued to offer statutory appointments to A around his offending behaviour
- His engagement with Action for Children highlighted that the offences he has been charged with are linked to his exploitation, yet this did not appear to be recognised until after he was sentenced and subsequently disclosed details about his exploitation to staff who had built a relationship with him
- A did not feel he could disclose details of who was exploiting him. He held the belief that the repercussions of doing so would put him in serious danger. He knew that his exploiters would not get caught or charged with drug offences as they had 'plenty runners working for them'. Police therefore were unable to respond to identify and sanction his exploiters.
- In considering these factors the available options open to A through the legal system and local processes are
 - Continued monitoring of his risks through risk management/strategy meetings. Managed locally by Children's Social Care
 - Increasing support offered to him by agencies – statutory and non statutory.
 - Consideration around a Child in Need Plan or Child Protection Plan. Both of these would centre around the families response

to addressing A's risk. Placing responsibility on A and his family to manage the exploitation he was facing

- Emergency Protection Order – that would remove A from his family for his own protection.
- Deprivation of Liberty Order – would result in A having his liberty removed as a result of being exploited, going against his right to be protected from exploitation,
- If A did disclose information about his exploiters, or they were identified, consideration could be given around modern slavery offences. This however would require evidential proof that A had been moved or trafficked.
- Child Abduction Warning Notices could be considered for those exploiting A if they were identified. As these are not legally enforceable they would not offer much protection to A.
- Threat to Life notice could also be considered. Whilst this is a proactive measure it does not offer protections to A if attempts are made to his life.

Our collective responsibility

The case study of A exemplifies numerous situations encountered across our exploitation services. Analysing A's case reveals that responses align with current guidance, policies, and legal obligations; however, these measures fail to protect him from harm. It demonstrates the challenging situation agencies face in coordinating an appropriate response in the face of complex ethical dilemmas. The need to safeguard and protect whilst recognising involvement in crime that is facilitated through exploitation. A is perceived and treated as an offender first and foremost, conveying to A that while we (the agencies) recognise his risk, our capacity to safeguard him is limited unless he identifies his exploiter or takes control of his own exploitation.

To enhance the protection of A and the hundreds of thousands of children affected by exploitation each year, the following areas could assist agencies in adopting a more comprehensive response:

- National strategy
- Statutory definition of the criminal exploitation of children
- New legal code that offers protections to children as well as sanctions for perpetrators.
- A clear funding pathway that is long term and sustainable. Current funding is short term, fragmented and often does not focus on exploitation given the challenges with quantifying, defining and responding to the issue. Without a clear focus on exploitation and our response funding will not be prioritised.

Further details of these recommendations can be found in the Jay Review; *Shattered Lives, Stolen Futures* (2024)[1](#)

The adoption of these areas would lead to significant improvements in practice, including:

- Enhanced awareness and training regarding criminal exploitation would facilitate better identification and early intervention. Agencies serving children should implement mandatory training focused on both sexual and criminal exploitation, acknowledging the intersections between these issues.
- Educational settings should develop strategies to respond to the needs of exploited children without resorting to exclusion. It's crucial to support these children in maintaining their connection with education, taking into account the challenges they encounter due to exploitation. Over 90% of children referred to our services in Wales have faced educational exclusion. Many children express feelings of alienation and unwelcomeness in educational environments, leading them to seek belonging elsewhere—something that exploiters readily provide.

- There should be a clear understanding that exploited children are victims, not offenders. Early recognition of vulnerabilities and indicators is essential, along with the proactive sharing of information across agencies that highlights this perspective.
- The terminology used to describe a child's exploitation must reflect their vulnerability, which would enhance safeguarding measures and decrease the number of children who are criminalized because of their exploitation.
- Children should be able to foster trust in a system that acknowledges their experiences of exploitation rather than being seen primarily as criminals and secondarily as victims.
- Agencies would gain greater confidence in the legal mechanisms available for the protection of children.
- Law enforcement would gain enhanced authority to disrupt exploiters, holding them accountable for their actions against children. This shift would reframe exploiters as child abusers rather than merely as perpetrators of unrelated crimes. The existing legal framework for addressing these offenders is often convoluted, challenging to substantiate, and not effectively utilized.

We conclude that more can be accomplished to support children who are criminally exploited. By improving our responses, we can instil hope and optimism in many young people who currently perceive there to be no escape. from