

# Reflective Report

---

Dylan Eberhard

## **The research I conducted**

My research was on the feasibility of devolving criminal justice and policing to the Welsh Parliament, the Senedd, to address the impact of county lines on Wales and the challenges this would create, particularly regarding cross-border policing. Throughout my research, I used a variety of sources. They included case law, statutes, proposed bills, national audits, statistical reports published by the government, journal reports, newspapers, websites, and Freedom of Information (FOI) requests. My research report begins by discussing factors of county lines. This section was particularly detailed, rather than analytical, however, that was necessary to provide the information and context required to understand the rest of the report. Therefore, I wrote about: grooming, forms of exploitation and coercion, cuckooing, and institutional failings. This section also discussed the flawed practicality of the existing law, the Modern Slavery Act s.45, that is meant to protect exploited persons and why it is not as effective as intended.

My next section focused on cross-border policing. I focused on the role that the British Transport Police (BTP) play in countering county lines and on the failures of the National Referral Mechanism and how it can be reformed. To learn more about the BTP, I sent a FOI request for statistics on how they cooperate with Regional Organised Crime Units and Transport for Wales. I also asked about the security measures at train stations in Wales, which fall under their jurisdiction. However, the British Transport Police denied my FOI on the basis that it would be too expensive and exceed the statutory compliance limit. This presented a challenge. For example, I wanted to know how many train stations in Wales had turnstiles as this is a security gap that causes a lack of ticket data. As the BTP did not provide any information, I found a report by the Office for Rail and Road in 2019 on the numbers of turnstiles at every train station in England and Wales and had to filter through this report to find all of the relevant Welsh ones. Such challenges were irritating at first, however, by narrowing down on the information I wanted I was able to locate sources that allowed me to continue with my research without input from their FOI. My research revealed that measures taken by the BTP could be improved, although this would require substantial investment from the government which is not necessarily available. Additionally, I analysed the role of the National Referral Mechanism, which has lost its authority as an expert opinion on whether a person is a victim of modern slavery or forced labour since *R v Breckani*. I discussed what measures can be taken by the Single

Competent Authority, which oversees the decisions, to reinstate it as an expert opinion in courtrooms and also touch upon the negative effect an NRM referral has due to the extended period of time, sometimes up to two years, it takes for a decision to be made.

Next, I discussed the benefits and concerns of devolving criminal justice and policing to the Senedd. To determine this, I relied particularly on an FOI I sent to the Welsh government. I requested information on measures that the Secretary for Education and the Secretary for Children and Social Care have taken to address truancy and other aspects on the welfare of children. Additionally, I asked about information on whether Social Care in Wales is developing its understanding of extrafamilial harm, which is how county lines grooming operates. I also asked whether the incumbent government, Welsh Labour, supported devolving criminal justice and policing to Wales. The response included the costs of areas the Senedd have invested in various parts of education to address truancy, confirmed that they are developing their understanding of extrafamilial harm and stated that the Welsh Labour supported increased devolution. Differences in strategies between the Senedd and Westminster illustrate that Wales would benefit from devolution. Some of the strategies Westminster implements, like the County Lines Programme, have had a 'relatively minimal' impact on importer areas, like Wales. This reflects the need for greater devolution to allow the Senedd to tackle county lines because nationwide policies are ineffective. The largest concern is likely what the impact would be on funding. Many devolved sectors in Wales are underfunded, and there is concern that if Westminster's current funding for Welsh constabularies is devolved, the Senedd might redirect it to other sectors instead of policing. Additionally, devolution would grant Wales the freedom to merge its four constabularies, which some in the police force have advocated for. However, this could lead to a reduced police presence in rural areas as resources might be redesignated to urban areas, which is what happened in Scotland. Nevertheless, that is a speculative concern, and irrespective of that, Wales is unable to make any such decision due to its lack of decision. Therefore, regardless of what policies the Senedd would like to pursue, they lack the political freedom to do so.

In my final section, I discussed reforms that the Senedd can pursue. Throughout my entire report I allude to problems affecting county lines nationwide, however, many of these are not realistically implementable

due to funding and political constraints, particularly devolving criminal justice and policing as this would require an updated devolution deal. Therefore, I focus upon what the Senedd can do presently to address county lines. My reforms include the creation of dedicated truancy officers, who would enhance cooperation between agencies to identify instances where truancy is linked county lines. I also recommend the creation of a Welsh replica of the National Referral Mechanism which addresses its current failures, like making decisions faster and creating better exit strategies that prevent exploited victims from returning to county lines. Finally, I recommend running increased awareness campaigns, similar to ones police in Merseyside and Manchester did where they ran extensive awareness campaigns directed at primary school students and with parents to discourage and prevent children from entering county lines and what signs to look out for that indicate somebody may be an exploited county lines victim.

My research concludes that devolution would be effective and that although there are challenges that may be encountered with cross-border policing, with careful preparation for devolution any potential problems can be mitigated.

### **How the research is impactful**

My research is original and, as such, it is impactful. There have been many reports on devolving criminal justice and policing to Wales and the impact of county lines on Wales. However, my research report provides an insight on what the impact of devolving criminal justice and policing would be on county lines. Moreover, my research is multifaceted in that it analyses nationwide failures and shortcomings and applies their impact to Wales. I conclude that devolution would benefit Wales and evaluate why the current policing system hinders countering county lines and that further devolution could improve this.

My final section on reforms is impactful because the reforms are realistic and could be implemented by the Senedd. I identify a variety of actions that could be taken to implement reforms that address county lines under the current devolution deal that Westminster has with the Senedd. This is impactful because rather than focusing on reforms that are unrealistic due to political and fiscal restraints, I state what could presently be done.

### **Activities I have been involved in to disseminate research**

I have created a poster which summarises my research report. I will be presenting this at the 2025 Laidlaw Conference in Durham and be able to communicate my findings to others. Devolution is often a topic that is not very prominently discussed in England unless the devolved nations discuss further devolution. Therefore, I look forward to presenting my findings and explaining the importance of devolution in creating a safer society in Wales. Additionally, I look forward to spreading awareness on county lines and the impact that consuming drugs in the UK has on children and vulnerable adults, because this is also an area where there is a lack of awareness.

When I had my FOI rejected by the BTP, they told me that they would still be interested in my findings. Since finishing my report, I have sent it to the BTP and highlighted the areas which are relevant to them. The secondary school that I attended in Wales is coincidentally the same school that the current Welsh First Minister, Eluned Morgan, attended. Therefore, via my principal's contact with her, I managed to send my report directly to her office. Additionally, I have sent my report to every major political party in Wales: Welsh Labour (who Eluned Morgan represents), Plaid Cymru, Welsh Conservatives, Welsh Liberal Democrats, Wales Green Party, and Reform UK.

### **The impact my research has had on me**

When I began my research, I knew very little about county lines. My only real knowledge of it came from a brief awareness session on what county lines are that every student at my school in Wales had to attend, which was about three years ago at the time of writing. When I learnt about the Laidlaw Programme, I was immediately intrigued and wanted to participate, however, none of the pre-defined projects on offer really interested me. I wanted to do something focused on law, but also something focused on Wales. Researching county lines, devolution and policing allowed me to learn about this. Before I began, I had foundational knowledge on these three areas, but after this summer I can confidently say that I know a lot. My research has made me realise that there are many shortcomings of the government and how it looks after and protects underprivileged children. After this research, I am far more aware of how broken the care

system throughout the UK is due to the large number of children, and also vulnerable adults, that are continuously exploited and how ineffective the measures the government implements are at protecting them. There is a lot more that can be done. Therefore, my research has impacted me by making me realise how urgent reforms are needed to allow government services to better address county lines and prevent the exploitation of children and vulnerable adults.

### **The leadership skills I developed throughout my research period and areas for improvement**

This is the longest piece of research that I have ever undertaken in my educational career, however, that was not my original intention when I began. My current report is approximately 8000 words, despite only intending to write half of that. When reflecting upon this, I am happy that I was ambitious enough to keep on researching and writing, but I also recognise the need to improve my organisation and punctuality. As my project was self-defined, I had limited contact with my supervisor except for a couple of meetings we had before the summer research began and feedback he provided on my draft. This was a learning curve, but also an irreplaceable part of the summer research experience because I alone had to guide myself throughout the project. This led to me making both mistakes and having to deal with the consequences myself. Although this was irritating in the moment, when I reflect upon it, I realise that I have learnt a lot about myself that I would not have been able to if I was under constant supervision and guidance by my supervisor.

My research period exceeded six weeks as I did it in three periods: beginning for a couple of weeks at the start of June, then at the end of July until August, and finishing during the end of September. I began fairly organised and set-out daily tasks to keep myself on track, but the scale of research I had to do overwhelmed me slightly, which led me to continue researching longer than I had originally planned before I could begin writing. This was because researching devolution, county lines, and cross-border policing together was quite a significant amount that I did not realise when I first set out. Therefore, I began writing far later than I had intended. Moreover, as I wrote the report, I realised that my target of approximately 4000 words was nowhere near enough for me to effectively evaluate and discuss every aspect that I had researched and wanted to analyse. In future projects, I will make a more realistic plan of my research projects to ensure

that I do not make the same mistake again and provide myself enough time to finish every task. Nevertheless, despite this I am still pleased that I had the ambition to keep on going despite feeling overwhelmed by the scale of research.

Applying this summer's experience to future leadership experiences I takeaway both positive areas that went well, and areas that need improvement. My ambition to write far more than I had originally intended is positive and something beneficial to all leaders because ambition helps people excel. Furthermore, perseverance is also something valuable that I experienced during this project. It was frustrating getting past the six weeks mark and realising that my project was not finished yet. Although this was partially due to my ineffective time-management, it was also because I was ambitious enough to research and write more than I would have been able to do within the plan I had created for six weeks (if I had a better plan, I think it would have been achievable to complete in six weeks). Therefore, perseverance is an essential skill for leaders because people often face unexpected setbacks and the ability to continue despite setbacks is necessary to be a leader.

Notwithstanding ambition and perseverance, the obvious area of improvement for me as a leader is working on my time-management and organisation. Although I did plan out my summer to finish the project in six weeks, I was not strict enough nor clear enough on what I had to do in those six weeks. While this does demonstrate a clear area for improvement, I would never have reached that conclusion if it were not for doing a self-defined project. Therefore, I am grateful for the independence I was awarded to carry out my research because without making mistakes and having to address them myself, I would not have learnt as much. Independence is also a valuable skill because leadership requires being able to make decisions without guidance. Although I faced setbacks, working independently taught me the importance of being organised, an area that I lacked in throughout the summer, and I am now aware of how I can improve this. As a leader, it is imperative to be punctual, hence, in the future, I will work on my organisation to ensure punctuality and prevent myself from making similar mistakes. However, if it were not for the large amount of independence I had in this project, I would not have had the ability to make mistakes and deal with the

consequences myself. Therefore, it is beneficial to be ambitious and to have perseverance as a leader, but this must be in combination with punctuality and organisation.

### **My future career and educational plans**

I am interested in pursuing an LLM, a master's degree in law. In a law master's you get a lot of freedom to specialise in whatever interests you and there tend to be no compulsory modules. I am still figuring out which areas of the law I am most interested in, therefore, for my optional modules this year I selected international human rights law and competition law, and for my final year and master's I will narrow down on whichever area I prefer. Following that, I will likely pursue a career as a lawyer.