

County Lines in Wales: Exploring Challenges with the Devolved Legislative Powers and Cross-border Policing

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Abstract

This report examines the challenges of tackling county lines in Wales within the devolved powers the Welsh Parliament, the Senedd, currently possess and cross-border policing. County lines is the organised trafficking of drugs and weapons and cash linked to the drug trade from urban into rural areas via exploiting children and vulnerable adults. It occurs across several constabularies' jurisdictions, which complicates how this can be addressed due to the multi-agency work required. This report argues that the 'reserved matter' of criminal justice and policing in the Wales Act 2017 inhibits the Senedd from properly addressing county lines within the Welsh context, as current strategies fail to account for Wales's unique, rural, importer context. It argues that devolution can enhance the protection of children and vulnerable adults by improving collaboration between police and other already devolved services, such as health, education, and Social Care. It also discusses recommendations that the Senedd could implement based upon the current devolution deal. The report concludes that devolving criminal justice and policing would create more effective multi-agency collaboration which results in improved safeguarding measures for children and vulnerable adults and that maintaining close cross-border relations with English constabularies would not be impeded.

Table of Contents

Introduction	page 3
1.0 – Factors of County Lines	page 4
1.1 – Grooming	page 4
1.2 – Forms of exploitation and coercion	page 8
1.3 – Cuckooing	page 9
1.4 – Institutional failings	page 11
2.0 – Cross-border Policing	page 15
2.1 – The role of the British Transport Police	page 16
2.2 – Reforming the National Referral Mechanism	page 18
3.0 – Devolving Criminal Justice and Policing	page 21
3.1 – Benefits of devolving criminal justice and policing	page 21
3.2 – Concerns on devolving criminal justice and policing	page 26
4.0 – Recommendations	page 29
Conclusion	page 32
Glossary	page 33
Bibliography	page 34
Appendix A	page 44
Appendix B	page 46

Introduction

The saturation of urban drug markets in the UK increased drug trafficking into the untapped markets of small towns and villages in rural communities, including Wales. County lines is the term given to drug trafficking from urban areas into rural communities, typically across several counties, with the drugs ordered via specific mobile phone lines and trafficked by 'runners,' exploited adolescents or vulnerable adults.¹ Runners may also traffic weapons or cash² related to the drug trade. In Wales, approximately 100 county lines operate that generate £80,000,000 annually,³ producing violence associated with drug trafficking in rural communities.⁴ Runners cross several police authorities' jurisdictions, making identifying child criminal exploitation (CCE) difficult because it requires collaboration between various constabularies.⁵ It also requires support from the British Transport Police (BTP), who police the railway networks, the most popular mode of transport for drug trafficking.⁶ The Welsh Parliament is able to legislate on certain matters, like social services, education, however, criminal justice⁷ and policing⁸ remains a 'reserved matter' following the Wales Act 2017, with the Home Office setting policing strategies instead. Although the Senedd have created regulations addressing county lines, particularly in education,⁹ the inability to legislate on criminal law and set policing strategies prevents the Senedd from creating a tailored Welsh approach to county lines. This is unlike Scotland and Northern Ireland who, due to their separate legal jurisdictions, have independent

¹ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 12 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

² Complex Safeguarding Wales, 'Child Criminal Exploitation' (*Cardiff University*) <<https://www.cardiff.ac.uk/complex-safeguarding-wales/child-criminal-exploitation>> accessed 2 June 2025.

³ Jamie Grierson, "County Lines': Huge scale of £500m drug industry revealed' *The Guardian* (29 January 2019).

⁴ 'County Lines' (*National Crime Agency*) <<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>> accessed 25 July 2025.

⁵ Blakeburn M and Smith R, 'Exploring the role of the British Transport Police in responding to 'County Lines' drug markets: Enforcement and safeguarding perspectives' (2020) 94(2) *The Police Journal* 241.

⁶ Blakeburn M and Smith R, 'Exploring the role of the British Transport Police in responding to 'County Lines' drug markets: Enforcement and safeguarding perspectives' (2020) 94(2) *The Police Journal* 241.

⁷ Wales Act 2017, Schedule 2 (New Schedule 7B) Part 1 s 4.

⁸ Wales Act 2017, Schedule 1 (New Schedule 7A) Section B5.

⁹ See Appendix B.

police forces.¹⁰ However, as virtually all county lines in Wales come from England,¹¹ effective cross-border policing is necessary if criminal justice and policing devolves to Wales. This report will explore the potential of devolving the 'reserved matter' of criminal justice and policing in Wales, arguing that this would result in an improved Welsh approach to tackling county lines while simultaneously considering the problems associated with cross-border policing that may arise and how these can be addressed.

1.0 – Factors of County Lines

To understand challenges with addressing county lines and if increased devolution is appropriate, several factors on county lines' causes must be examined. Although, ultimately, the underlying reason is rising availability¹² due to high demand (there are 1 million Class A drug users in England and Wales)¹³ meaning Urban Street Gangs (USGs) and Organised Criminal Groups (OCGs) continue exploiting children for profit.

1.1 – Grooming

Children are groomed into becoming runners during early adolescence.¹⁴ Prominent factors are the cost-of-living crisis,¹⁵ youth culture's materialism,¹⁶ and loneliness.¹⁷ Due to the cost-of-living crisis, children who

¹⁰ Jones R, Harrison M, and Jones T, 'Policing and devolution in the UK: The 'special' case of Wales' (2023) 17 *Policing: A Journal of Policy and Practice* 2.

¹¹ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 11 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

¹² 'County Lines' (*National Crime Agency*) <<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>> accessed 25 July 2025.

¹³ Office for National Statistics, 'Drug Misuse in England and Wales: Year Ending March 2024' (*Ons.gov.uk*, 12 December 2024) <<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/drugmisuseinenglandandwales/yearendingmarch2024>> accessed 27 August 2025.

¹⁴ 'County Lines' (*Cysur*) <<https://cysur.wales/exploitation/county-lines/>> accessed 1 June 2025.

¹⁵ 'Criminals Capitalising on a Crisis' (*The Children's Society*, 7 February 2023) <<https://www.childrensociety.org.uk/what-we-do/blogs/criminals-capitalising-cost-living-crisis>> accessed 26 August 2025.

¹⁶ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 24 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

¹⁷ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 27 Cascade Children's Social Care Research and Development Centre

want to support their parents financially, especially with basic necessities, like 'heating, food, and petrol,' are exploited by criminals.¹⁸ Materialism among older adolescents involved in county lines (ages 15-17 and young adults¹⁹), referred to as 'elders,'²⁰ influences impressionable children in their neighbourhoods.²¹ Materialism among UK youth has been exacerbated by advertising and social media,²² and participating as a runner in county lines is 'easy money'²³ that allows children to join or maintain the materialistic lifestyle surrounding them. A cycle emerges where recruited young adolescents grow up, becoming elders, and groom other young adolescents for recruitment in the same manner they themselves were recruited.²⁴ This forms a challenging dilemma for the criminal justice system as such people are both victims of exploitation and perpetrating exploitation, leading to the label 'alpha victim.'²⁵

Peer pressure and loneliness leads to children participating in county lines too because when one child is groomed, their friends and schoolmates might be influenced to join, creating peer pressure to enter county

<<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

¹⁸ 'Criminals Capitalising on a Crisis' (*The Children's Society*, 7 February 2023)

<<https://www.childrenssociety.org.uk/what-we-do/blogs/criminals-capitalising-cost-living-crisis>> accessed 26 August 2025.

¹⁹ Home Office, 'Criminal Exploitation of Children and Vulnerable Adults: County Lines' (*Gov.uk*, 2016)

<<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>> accessed 10 June 2025;

²⁰ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 31 *Cascade Children's Social Care Research and Development Centre*

<<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

²¹ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 25 *Cascade Children's Social Care Research and Development Centre*

<<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

²² Zawadzka A and others, 'Can the youth materialism scale be used across different countries and cultures?' (2021) 63(3) *International Journal of Market Research* 318.

²³ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 52 *Cascade Children's Social Care Research and Development Centre*

<<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

²⁴ Caluori J, 'No right move? Devolving decision making for criminally exploited children' (2021) *Crest Advisory* <<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>> accessed 8 June 2025.

²⁵ Caluori J, 'No right move? Devolving decision making for criminally exploited children' (2021) *Crest Advisory* <<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>> accessed 8 June 2025.

lines.²⁶ This can occur during the transitional period between moving from primary to secondary school or simply to a new school, where peers will act friendly towards their new classmate under the guise of recruiting them into county lines.²⁷ Therefore, the child may form harmful friendships due to a desire to fit in. Students with challenging behaviour and additional learning needs are particularly susceptible because they may be placed in Pupil Referral Units, a place of alternative education for children who do not adapt well to mainstream schooling, whether due to misbehaviour or neurodivergence, which diminishes a child's self-worth, often resulting in strained relationships with their parents.²⁸ Consequently, children become vulnerable to grooming because kindness from elders and other runners is the only time they are treated compassionately, driving them to seek out validation from these negative influences. Truancy is often the first indicator of a child successfully being groomed, because the child replaces schooltime with negative influences.²⁹

The situation for looked after children (LACs), children in care homes, is worse. LACs are 'overrepresented'³⁰ in children suffering criminal exploitation. In North Wales, half of children reported missing due to county lines activity were LACs.³¹ During the transitional period of relocating from their own home to a care home, LACs diminish or lose their support network of friends and family because in their

²⁶ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 27 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

²⁷ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 29 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

²⁸ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 28 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

²⁹ Children's Commissioner, 'Keeping kids safe' (*Children's Commissioner*, February 2019) <<https://assets.childrenscommissioner.gov.uk/wpuploads/2019/02/CCO-Gangs.pdf>> accessed 25 September 2025.

³⁰ Caluori J, Corlett M, and Stott J, 'County Lines and Looked After Children' (2020) 19 Crest Advisory <<https://www.crestadvisory.com/post/report-county-lines-and-looked-after-children>> accessed 7 June 2025.

³¹ Caluori J, Corlett M, and Stott J, 'County Lines and Looked After Children' (2020) 26 Crest Advisory <<https://www.crestadvisory.com/post/report-county-lines-and-looked-after-children>> accessed 7 June 2025.

care home they have few relationships, if any at all.³² This is exacerbated the further away the care home is from their family home because county lines relationships can be maintained online while physical separation from family weakens support and strengthens ties with runners and dealers.³³ The relationships with other runners make LACs more susceptible because they act as a sort of family, creating 'belonging.'³⁴ Additionally, in an effort to prevent runners from being apprehended by the police, USG/OCGs have become increasingly creative in who they recruit. Many children are recruited into becoming runners by a person who they think is their boyfriend or girlfriend, where exploiters groom the child under the guise of a normal relationship.³⁵ Traffickers also use 'clean skins,' children unknown to social services,³⁶ sometimes from affluent backgrounds that do not need money,³⁷ to avoid police detection. Another targeted demographic that is 'particularly vulnerable'³⁸ are young unaccompanied asylum seekers, desperate for money and community. Moreover, because they are unaccompanied, disappearing on trips trafficking drugs for days is unlikely to illicit unwanted attention in comparison to a child living with their family. Evidently, the risk for exploitation exists for children from various backgrounds.

³² Caluori J, Corlett M, and Stott J, 'County Lines and Looked After Children' (2020) 40 Crest Advisory <<https://www.crestadvisory.com/post/report-county-lines-and-looked-after-children>> accessed 7 June 2025.

³³ Firmin C, 'Relocation, relocation, relocation: home and school-moves for children affected extra-familial risks during adolescence' (Institute of Applied Social Research, University of Bedfordshire 2019) <<https://uobrep.openrepository.com/bitstream/handle/10547/623285/FINAL+relocation+Carlene+Firmin+accepted.pdf;sequence=2>> accessed 4 October.

³⁴ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 35 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

³⁵ Barnardo's Scotland, 'Guidance on Child Sexual Exploitation' (*Barnardo's Scotland*, 2014) 7 <https://www.angus.gov.uk/sites/angus-cms/files/2017-08/Barnardos%20Guidance%20on%20Child%20Sexual%20Exploitation_1.pdf> accessed 4 October 2025.

³⁶ Home Office, 'Criminal Exploitation of Children and Vulnerable Adults: County Lines' (*Gov.uk*, 2016) <<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>> accessed 10 June 2025.

³⁷ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 28 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

³⁸ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 36 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

1.2 – Forms of exploitation and coercion

Children are unaware of the risks involved with county lines, whether risks of prosecution or violence. Therefore, although children seem complicit, they face violence or threats of violence towards themselves, family or friends;³⁹ child financial exploitation (CFE);⁴⁰ and child sexual exploitation (CSE).⁴¹

In county lines, CSE has emerged as a form of exploitation experienced by both girls and boys via 'plugging'.⁴² The trafficked drugs are wrapped in plastic or a condom and inserted into the gastro-intestinal tract to avoid police discovering them. This can lead to 'injury potentially, degrading treatment, sexual assaults'.⁴³ The Crime and Policing Bill would make plugging a crime,⁴⁴ however, this bill, at the time of writing, has not passed yet. When a child goes missing, the likelihood of them experiencing CSE is high. In Merseyside, a report found that 46% of missing children had experienced CSE.⁴⁵ Furthermore, CFE, taking the form of debt bondage, which is when a child is forced to deliver drugs to pay off a supposed debt, is the most prevalent way in which children are prevented from quitting their involvement in the drug trade, which many want to quit after experiencing violence.⁴⁶ The debt is often caused by the intentional stealing of the child's package, forcing the child to pay back the value of the drugs 'stolen'; lying that the debt has not been

³⁹ 'County Lines Exploitation' (*North Wales Safeguarding Board*)

<<https://www.northwalessafeguardingboard.wales/county-lines-exploitation/>> accessed 1 June 2025.

⁴⁰ Complex Safeguarding Wales, 'Child Criminal Exploitation' (*Cardiff University*)

<<https://www.cardiff.ac.uk/complex-safeguarding-wales/child-criminal-exploitation>> accessed 2 June 2025.

⁴¹ Complex Safeguarding Wales, 'Child Criminal Exploitation' (*Cardiff University*)

<<https://www.cardiff.ac.uk/complex-safeguarding-wales/child-criminal-exploitation>> accessed 2 June 2025.

⁴² Home Office, 'Criminal Exploitation of Children and Vulnerable Adults: County Lines' (*Gov.uk*, 2016)

<<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>> accessed 10 June 2025.

⁴³ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 22 Cascade Children's Social Care Research and Development Centre

<<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁴⁴ Crime and Policing Bill HC Bill 2024-25 HL Bill 111, Chapter 3 s 59.

⁴⁵ Caluori J, Corlett M, and Stott J, 'County Lines and Looked After Children' (2020) 13 Crest Advisory <<https://www.crestadvisory.com/post/report-county-lines-and-looked-after-children>> accessed 7 June 2025.

⁴⁶ Home Office, 'Criminal Exploitation of Children and Vulnerable Adults: County Lines' (*Gov.uk*, 2016)

<<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>> accessed 10 June 2025.

paid off yet; getting the child addicted to drugs they cannot afford, particularly cannabis;⁴⁷ and high interest rates.⁴⁸ CFE can also involve money laundering,⁴⁹ with children manipulated into giving bank details to exploiters or fronting cryptocurrency accounts.⁵⁰ Due to a 'culture against snitching' coupled with a 'fear of violent repercussions,' children are trapped in a cycle of paying debt.⁵¹ Parental inaction exacerbates this, because some dismiss absences as normal teenage behaviour and others fear reporting them could result in care placement. Groomers may teach children to falsely threaten their parents of abuse to prevent parents contacting police or social services.⁵² These methods of coercion keep children trapped so that they can continue to be exploited.

1.3 – Cuckooing

Cuckooing forms an important part of the county lines process. They are homes owned by vulnerable adults on a county line who have had their home taken over by an USG/OCG that has moved into the area.⁵³ Cuckooed victims are not necessarily drug addicts, although they can be,⁵⁴ however, often other factors

⁴⁷ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 26 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁴⁸ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 44 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁴⁹ Complex Safeguarding Wales, 'Child Criminal Exploitation' (*Cardiff University*) <<https://www.cardiff.ac.uk/complex-safeguarding-wales/child-criminal-exploitation>> accessed 2 June 2025.

⁵⁰ Home Office, 'Criminal Exploitation of Children and Vulnerable Adults: County Lines' (*Gov.uk*, 2016) <<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>> accessed 10 June 2025.

⁵¹ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 9 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁵² Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 8 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁵³ 'County Lines Exploitation' (*North Wales Safeguarding Board*) <<https://www.northwalessafeguardingboard.wales/county-lines-exploitation/>> accessed 1 June 2025.

⁵⁴ 'County Lines Exploitation' (*North Wales Safeguarding Board*) <<https://www.northwalessafeguardingboard.wales/county-lines-exploitation/>> accessed 1 June 2025.

make them vulnerable to cuckooing, notably disability.⁵⁵ This is because disabled adults frequently suffer social isolation and lack family support, making them easier targets for cuckooing as they will experience 'predatory friendships,' where, like some groomed children, they will have their loneliness exploited and be groomed into letting their house become cuckooed.⁵⁶ The USG/OCG that has expanded will sometimes place local children in charge of the cuckooed house which can turn into 'trap houses,' meaning addicts use the house as a safe haven to consume drugs, resulting in complicated relationships where you get elders controlling 'trap houses,' meaning children 'as young as 14' are exerting control over drug addicts in their 30s and 40s.⁵⁷

An issue with cuckooing is that due to the vulnerable adults still being adults, identifying and proving exploitation over complicity is difficult. This is because at first, the victims may willingly allow their house to be cuckooed in exchange for something, which is referred to as 'quasi-cuckooing.'⁵⁸ This can be for various reasons, with addicts cuckooing their house in exchange for drugs, and lonely disabled people allowing their house to be cuckooed in exchange for friendship. Nevertheless, both addicts and isolated disabled people have had a vulnerability exploited and the relationship can swiftly transgress into the victim becoming indebted to the USG/OCG or suffering violence.⁵⁹ However, progress has been made as agencies understand the exploitative nature of cuckooing, with some housing associations working together with agencies to evict offenders and support victims in regaining possession of their properties.⁶⁰ Moreover,

⁵⁵ Macdonald S and others, 'Becoming cuckooed: conceptualising the relationship between disability, home takeovers and criminal exploitation' (2024) 39(2) *Disability & Society* 486.

⁵⁶ Macdonald S and others, 'Becoming cuckooed: conceptualising the relationship between disability, home takeovers and criminal exploitation' (2024) 39(2) *Disability & Society* 491.

⁵⁷ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 31 *Cascade Children's Social Care Research and Development Centre* <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁵⁸ Macdonald S and others, 'Becoming cuckooed: conceptualising the relationship between disability, home takeovers and criminal exploitation' (2024) 39(2) *Disability & Society* 489.

⁵⁹ "Drug Dealers Used Me like a Dog": Two Case Studies of Cuckooing Offences in Dyfed-Powys' (*Dyfed-Powys Police*, 30 April 2021) <<https://www.dyfed-powys.police.uk/news/dyfed-powys/news/2021/april-2021/drug-dealers-used-me-like-a-dog-two-case-studies-of-cuckooing-offences-in-dyfed-powys/>> accessed 1 June 2025.

⁶⁰ National County Lines Coordination Centre, 'Disrupting County Lines Policing Strategy 2024-2027' (*National Police Chiefs' Council*, 2024) 15 <<https://cdn.prgloo.com/media/748eae528e9b4b609551b3772f6330ff.pdf>> accessed 18 September 2025.

the proposed Crime and Policing Bill, at the time of writing still under review, would make it an offence to cuckoo another individual's home for criminal purposes.⁶¹ Increasing recognition of the harm caused by cuckooing underlines the need for agencies to cooperate with each other to effectively recognise the signs of cuckooing and protect vulnerable adults.

1.4 – Institutional failings

There are a number of institutional failings needing to be addressed to improve the protection of children. In some regards, agencies have taken effective measures that have had a real impact, however, areas for improvement remain. Agencies, whether police, social services, school, or others, should understand that a child or vulnerable adult is a victim and that getting involved in county lines was not a 'choice.'⁶² Developing this understanding will remove the 'postcode lottery'⁶³ where treatment of an exploited person involved in county lines depends on the county in which they are caught. In this 'postcode lottery,' exploited children have the risk of being treated by some agencies, although not all, as responsible for their sexual exploitation being a 'lifestyle choice'⁶⁴ rather than treating them as victims. This is linked to 'adultification,' where despite still being children, they will be treated and judged as adults.⁶⁵ Adultification is worse among children from minority ethnic backgrounds, demonstrating more institutional failings.⁶⁶ Furthermore, females have been targeted for exploitation as runners because they are more likely to go unnoticed due to the misconception that girls are solely victims of CSE but would not be used for CCE. This leads to many

⁶¹ Crime and Policing Bill HC Bill 2024-25 HL Bill 111, Chapter 2.

⁶² Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 13 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁶³ Coomber R and others, 'County Lines, policing and vulnerability' (2025) Vulnerability & Policing Futures <<https://vulnerabilitypolicing.org.uk/wp-content/uploads/sites/133/2025/04/county-lines-policing-and-vulnerability-report.pdf>> accessed 24 July 2025.

⁶⁴ Casey L, 'National Audit on Group-Based Child Sexual Exploitation and Abuse' (GOV.UK, June 2025) 98 <https://assets.publishing.service.gov.uk/media/685559d05225e4ed0bf3ce54/National_Audit_on_Group-based_Child_Sexual_Exploitation_and_Abuse.pdf> accessed 20 September 2025.

⁶⁵ Casey L, 'National Audit on Group-Based Child Sexual Exploitation and Abuse' (GOV.UK, June 2025) 9 <https://assets.publishing.service.gov.uk/media/685559d05225e4ed0bf3ce54/National_Audit_on_Group-based_Child_Sexual_Exploitation_and_Abuse.pdf> accessed 20 September 2025.

⁶⁶ Coomber R and others, 'County Lines, policing and vulnerability' (2025) Vulnerability & Policing Futures <<https://vulnerabilitypolicing.org.uk/wp-content/uploads/sites/133/2025/04/county-lines-policing-and-vulnerability-report.pdf>> accessed 24 July 2025.

girls avoiding detection as institutions do not consider girls to possess the typical character that would be expected of someone involved in county lines.⁶⁷

Legislation exists preventing exploited children and vulnerable adults being criminally liable for offences they commit due to exploitation; however, the practicality is flawed. The UK is under an obligation by Article 4 of the European Convention on Human Rights to prohibit slavery and forced labour.⁶⁸ To enforce this, the Modern Slavery Act 2015 s.45 provides a defence for victims of slavery and forced labour who were compelled to commit crime.⁶⁹ The defence is frequently used by those who have been apprehended for drug trafficking,⁷⁰ including runners. However, common factors of county lines that runners are involved with are prohibited from applying s.45 due to Schedule 4.⁷¹ It includes the possession of firearms,⁷² despite runners being known to transport weapons alongside cash and drugs.⁷³ Furthermore, it notably prohibits the defence if the offence committed was forcing labour upon others⁷⁴ and if the defendant has perpetrated or put people in fear of violence.⁷⁵ This is problematic due to 'alpha victims' because runners are usually recruited by other children or young adults and as those recruits become older, they become recruiters themselves and exploit other children, creating a cycle.⁷⁶ In *R v N*,⁷⁷ a victim of trafficking involved in producing Class B drugs was recognised as a victim. However, in *R v O*,⁷⁸ a victim of trafficking who was

⁶⁷ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 22 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁶⁸ European Convention on Human Rights, Art 4.

⁶⁹ Modern Slavery Act 2015, s 45.

⁷⁰ Thornton S, 'The Modern Slavery Act 2015 Statutory Defence: A call for evidence' (2020) 7 Independent Anti-Slavery Commissioner. <<https://www.antislaverycommissioner.co.uk/media/tlnpkzlt/the-modern-slavery-act-2015-statutory-defence-a-call-for-evidence.pdf>> accessed 14 September 2025.

⁷¹ Modern Slavery Act 2015, Schedule 4.

⁷² Modern Slavery Act 2015, Schedule 4 s 13.

⁷³ Complex Safeguarding Wales, 'Child Criminal Exploitation' (*Cardiff University*) <<https://www.cardiff.ac.uk/complex-safeguarding-wales/child-criminal-exploitation>> accessed 2 June 2025.

⁷⁴ Modern Slavery Act 2015, Schedule 4 s 36.

⁷⁵ Modern Slavery Act 2015, Schedule 4 s 7 and s 27.

⁷⁶ Caluori J, 'No right move? Devolving decision making for criminally exploited children' (2021) Crest Advisory <<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>> accessed 8 June 2025.

⁷⁷ *R v O*; *R v N* [2019] EWCA Crim 752.

⁷⁸ *R v O*; *R v N* [2019] EWCA Crim 752.

compelled into running a prostitution ring was held culpable. This demonstrates that determining victimhood depends on the offence committed, which is illogical because it undermines the exploitation a victim committing a Schedule 4 prohibited offence. Additionally, the Independent Anti-Slavery Commissioner identified that police don't immediately check whether the person they have apprehended is a victim of modern slavery.⁷⁹ This is problematic because the defendant may not be aware of the existence of the defence, and if they are, are unwilling to cooperate because they do not want to be a snitch.⁸⁰ After the trial, there is also little support for the defendant who may need a safe house due to 'fear of reprisals.'⁸¹ In the parliamentary debate on the ten-year anniversary of the Modern Slavery Act, Tom Hayes, MP, stated that the government should provide additional funds for organisations that provide safe house accommodation for victims of trafficking and modern slavery, which remains unaddressed.⁸² A decade on from the legislation being enacted, a lack of clarity remains about the practical enforceability of s.45, leading to an ambiguous application of the defence that does not consistently protect victims.

Social services throughout the UK suffer a high staff turnover rate, especially in England with 13.8%,⁸³ which impacts Wales as many runners come from England.⁸⁴ This is harmful because it prevents trust being created between the social worker and the child. Consequently, the child is unlikely to be open and pass on information regarding their exploitation to their worker if every few months they receive a new one. Only

⁷⁹ 'Section 45 of the Modern Slavery Act: Evidence Review' (*Modern Slavery PEC*, 7 April 2022) <<https://www.modernslaverypec.org/resources/section-45-modern-slavery-act-review>> accessed 14 September 2025.

⁸⁰ Robinson G and Willis S, 'Whipping up Moral Panic: The "Modern Slavery" Defence' (*Black Box Research & Consultancy* 25 February 2022) <<https://blackboxresearchandconsultancy.com/blog/whipping-up-moral-panic-the-modern-slavery-defence/>> accessed 14 September 2025.

⁸¹ Crown Prosecution Service, 'Modern Slavery and Human Trafficking: Offences and Defences, Including the Section 45 Defence' (www.cps.gov.uk, 30 April 2020) <<https://www.cps.gov.uk/legal-guidance/modern-slavery-and-human-trafficking-offences-and-defences-including-section-45>> accessed 29 September 2025.

⁸² HC Deb 27 March 2025, Vol 764, col 1199.

⁸³ Department for Education, 'Children's Social Work Workforce' (*Service.gov.uk*, 27 February 2025) <<https://explore-education-statistics.service.gov.uk/find-statistics/children-s-social-work-workforce/2024>> accessed 25 August 2025.

⁸⁴ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 11 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

38% of children with social workers had one care worker assigned to them, the remainder experienced at least two or more.⁸⁵ Additionally, the traditional model of social services focuses on intrafamilial harm, meaning harm caused by a relative (domestic abuse), that the child might be suffering. This neglects extrafamilial harm, meaning harm caused by persons outside of the family, like county lines.⁸⁶ However, there are cases of the 'traditional model' of drug supply, where children born into 'crime families' are expected to enter the drug trafficking business regardless of their desire to do so.⁸⁷ Nevertheless, many of the children exploited for the drug trade in county lines are not involved via familial relationships.⁸⁸ Consequently, social services must improve their turnover rate while increasing awareness of extrafamilial harm.

In response to a Freedom of Information request (FOI), the Welsh government responded that child protection services are developing their understanding of exploitation processes caused by extrafamilial harm to create a more 'holistic approach'.⁸⁹ This includes supporting parents in understanding what types of harm their child might experience and 'mobilising multiple agencies' to address this. Social services must develop this to ensure that they do not scrutinise parents and only seek to identify intrafamilial harm. Often a child's safest place is still at home with their family,⁹⁰ provided they are not suffering domestic abuse, therefore, extrafamilial harm must be targeted so that parents do not feel helpless and fail to reach out to

⁸⁵ Samuel M, 'A Quarter of Children in Care Had at Least Three Social Workers in 2023-24, DfE Reveals - Community Care' (*Community Care*, 17 June 2025) <<https://www.communitycare.co.uk/2025/06/17/a-quarter-of-children-in-care-had-at-least-three-social-workers-in-2023-24-dfe-reveals/>> accessed 25 August 2025.

⁸⁶ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 7 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁸⁷ Complex Safeguarding Wales, 'Child Criminal Exploitation' (*Cardiff University*) <<https://www.cardiff.ac.uk/complex-safeguarding-wales/child-criminal-exploitation>> accessed 2 June 2025.

⁸⁸ Complex Safeguarding Wales, 'Child Criminal Exploitation' (*Cardiff University*) <<https://www.cardiff.ac.uk/complex-safeguarding-wales/child-criminal-exploitation>> accessed 2 June 2025.

⁸⁹ See Appendix B.

⁹⁰ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 43 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

social services out of fear their child will be placed in care, which, as aforementioned, exacerbates the involvement of a child in county lines. Finally, an issue is that services can only intervene for minors, not adults because they can decline support.⁹¹ Although a young adult may have reached the age of majority, one professional explained that individuals cannot 'go from making an uninformed choice at 17 to making an informed choice at 18 when you've spent the last three years being groomed.'⁹² Therefore, it is illogical that vulnerable adults are able to decline social services support in the same manner as someone not involved in county lines who has just reached adulthood. Furthermore, because support can be declined, it is difficult to prevent a vulnerable adult from making mistakes that could lead to imprisonment, which impedes their future. Although adults cannot be forced into accepting support from social services, if they are convicted and charged with an offence, their previous abuse and exploitation that they experienced as a child and adult should be a relevant factor when determining their sentence. This is particularly important due to the practical limitation of the s.45 defence on groomed 'alpha victims' who commit Schedule 4 prohibited offences. Labelling a child as a 'gang member' also has harmful implications because it implies that it was a choice, rather than the product of grooming.⁹³ Institutions must transition to an approach where they openly seek to determine exploitation that a child or vulnerable adult has experienced, rather than assuming complicity, and applying labels that approve this belief, simply because s.45 does not apply.

2.0 – Cross-border Policing

The current system of UK policing is not strong enough to effectively counter county lines. Police forces, particularly in rural areas, which most of Wales is, do not expect to regularly work with other forces in constabularies that may well be several hundred miles away.⁹⁴ However, this is what countering county

⁹¹ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 44 *Cascade Children's Social Care Research and Development Centre* <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁹² Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 41 *Cascade Children's Social Care Research and Development Centre* <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

⁹³ Williams A and Finlay F, 'County lines: how gang crime is affecting our young people' (2018) 104(8) *Disease in Childhood* 730.

⁹⁴ Blakeburn M and Smith R, 'Exploring the role of the British Transport Police in responding to 'County Lines' drug markets: Enforcement and safeguarding perspectives' (2020) 94(2) *The Police Journal* 247.

lines demands. Fortunately, Regional Organised Crime Units (ROCUs) exist, which are groups of multiple constabularies that work together to counter organised crime, like county lines, in their respective regions. In Wales two ROCUs exist, Tarian which covers the southern Welsh constabularies of Gwent, South Wales, and Dyfed-Powys; and North West ROCU (NWROCU), which covers the North Wales constabulary and constabularies in North West England, including Merseyside and Manchester.⁹⁵ Despite these, county lines can bypass the role of ROCUs by travelling through multiple ROCU jurisdictions, complicating the ability of constabularies to work together.⁹⁶ Although, some ROCUs, like the NWROCU, do not experience this as many lines run within it.⁹⁷ To tackle the dramatic rise of county lines, the government introduced the County Lines Programme in 2019. It aims to ‘tackle the gangs’ using children to ‘run county lines through violence and exploitation.’⁹⁸ Since its inception, thousands of lines have continued to be closed down. However, figures from 23/24 estimate at least 14,500 children remain in county lines.⁹⁹ Supporting the closure of county lines requires support from the British Transport Police and reforming the National Referral Mechanism, which determines if a child is a victim of CCE.

2.1 – The role of the British Transport Police

Drugs are most frequently trafficked via railway.¹⁰⁰ Therefore, the role of the BTP is crucial in properly tackling county lines. Constabularies operate independently of each other,¹⁰¹ therefore, when a county lines drug runner is trafficking drugs, weapons, or cash, they will exit one constabulary, deliver to another constabulary, and often pass other constabularies on the way. The BTP is the only police force that is

⁹⁵ ‘Our National Network’ (*Regional Organised Crime Unit Network*) <<https://www.rocu.police.uk/our-national-network/>> accessed 19 August 2025.

⁹⁶ Blakeburn M and Smith R, ‘Exploring the role of the British Transport Police in responding to ‘County Lines’ drug markets: Enforcement and safeguarding perspectives’ (2020) 94(2) *The Police Journal* 248.

⁹⁷ Caluori J, Corlett M, and Stott J, ‘County Lines and Looked After Children’ (2020) 24 *Crest Advisory* <<https://www.crestadvisory.com/post/report-county-lines-and-looked-after-children>> accessed 7 June 2025.

⁹⁸ Home Office, ‘County Lines Programme Data’ (*GOV.UK*, 3 June 2025) <<https://www.gov.uk/government/publications/home-offices-county-lines-programme-data/county-lines-programme-data>> accessed 5 June 2025.

⁹⁹ Home Office, ‘County Lines Programme Data’ (*GOV.UK*, 3 June 2025) <<https://www.gov.uk/government/publications/home-offices-county-lines-programme-data/county-lines-programme-data>> accessed 5 June 2025.

¹⁰⁰ Blakeburn M and Smith R, ‘Exploring the role of the British Transport Police in responding to ‘County Lines’ drug markets: Enforcement and safeguarding perspectives’ (2020) 94(2) *The Police Journal* 241.

¹⁰¹ Police Act 1996 s 10.

present throughout the whole jurisdiction, therefore, they play a crucial role in ensuring information is shared with other agencies in a timely manner.¹⁰² Although the BTP have a County Lines Taskforce, which has played an important role in identifying runners on the trains, the process that follows the safeguarding of a child can be improved. By improving information sharing, every agency involved in safeguarding the child will have equal access to the information available to make informed and appropriate decisions regarding the child's wellbeing and 'prevent further exploitation.'¹⁰³ Strengthening the BTP's capabilities to collaborate with other agencies an important part of creating a measurable difference in countering county lines.

The BTP are responsible for the security of train stations,¹⁰⁴ therefore, a key weakness is when train stations lack security infrastructure, particularly turnstiles and CCTV, which was highlighted as a potential method to tackle the growth of county lines in a report on the BTP's role in county lines.¹⁰⁵ In Wales, many rural stations where the drugs are being delivered lack this basic security. In 2019, the Office of Rail and Road conducted a study of all British stations and the number of Automatic Ticket Gates, turnstiles, each had. In Wales, only 13 stations out of 248 have turnstiles, occurring only in urban areas.¹⁰⁶ That is approximately 5%. This demonstrates the ease at which drugs can be transported by rail into rural areas and presents a large deficit in security and ticket data that could be used to combat county lines. Most stations in Wales do have CCTV, although the exact number is unspecified.¹⁰⁷ Nevertheless, the lack of turnstiles demonstrates a clear security gap where runners can easily use the railway network without paying for tickets. If turnstiles were widespread and at every station, tickets would have to be paid for, and details of

¹⁰² Blakeburn M and Smith R, 'Exploring the role of the British Transport Police in responding to 'County Lines' drug markets: Enforcement and safeguarding perspectives' (2020) 94(2) *The Police Journal* 254.

¹⁰³ Home Office, 'Criminal Exploitation of Children and Vulnerable Adults: County Lines' (Gov.uk, 2016) <<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>> accessed 10 June 2025.

¹⁰⁴ Railway and Transport Safety Act 2003, s 31.

¹⁰⁵ Blakeburn M and Smith R, 'Exploring the role of the British Transport Police in responding to 'County Lines' drug markets: Enforcement and safeguarding perspectives' (2020) 94(2) *The Police Journal* 253.

¹⁰⁶ Office of Rail and Road, 'Number of Automatic Ticket Gates (ATG) installed at each station in Great Britain, March 2019' (*Office of Rail and Road*, 2019) <<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://dataportal.orr.gov.uk/media/1996/ad-hoc-number-of-automatic-ticket-installed-at-each-station-in-great-britain-march-2019.ods&ved=2ahUKEwjh7f26sl-QAxAwP0EAHcRLDBgQFnoECBgQAQ&usq=AOvVaw3q70ok5rKORk989cRMN5Nt>> accessed 5 August 2025.

¹⁰⁷ 'Security' (*Transport for Wales*) <<https://tfw.wales/about-us/our-culture/safety/security>> accessed 27 July 2025.

bank cards used to pay for tickets that apprehended runners have used could be vital in bringing about successful prosecutions against USG/OCG members. Although, this may be avoided by tickets being paid for with cash or runners using their own bank cards. However, CCTV will record a runner using cash to buy tickets and if the same runner does this regularly to several distant locations during unusual times when they would be expected to be at school, it creates a pattern that can be investigated. This is feasible because Network Rail, who operate CCTV infrastructure throughout Great Britain, keep CCTV recordings for up to 31 days,¹⁰⁸ providing enough time for unusual and suspicious cash purchases of tickets to be identified and investigated. Certainly, making turnstiles widespread in Wales is a substantial investment. However, annually, the economy loses an estimated £20 billion due to the drug trade.¹⁰⁹ Therefore, the investment in improving security would be a significant trade-off that could decrease the ease at which rural locations are reached, while also decreasing the violence associated with the drug trade in the affected rural communities.

2.2 – Reforming the National Referral Mechanism

The National Referral Mechanism (NRM) is the tool used by the Single Competent Authority, part of the Home Office, to determine whether a person is a victim of modern slavery.¹¹⁰ It was originally intended for victims born outside of the UK trafficked into the country for forced labour on farms, sex work, etc.¹¹¹ However, CCE is also a form of forced labour, particularly when a child becomes a victim of debt bondage.¹¹² Consequently, despite the NRM being intended for non-British nationals, by 2020, around a

¹⁰⁸ 'Surveillance Privacy Notice' (*Network Rail*, 4 June 2025) <<https://www.networkrail.co.uk/footer/privacy-notice/surveillance-privacy-notice/>> accessed 22 September 2025.

¹⁰⁹ National Audit Office, 'Reducing the harm from illegal drugs' (*Home Office*, 20 October 2023) <<https://www.nao.org.uk/wp-content/uploads/2023/10/reducing-the-harm-from-illegal-drugs.pdf>> accessed 27 September 2025.

¹¹⁰ Caluori J, 'No right move? Devolving decision making for criminally exploited children' (2021) Crest Advisory <<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>> accessed 8 June 2025.

¹¹¹ Caluori J, 'No right move? Devolving decision making for criminally exploited children' (2021) Crest Advisory <<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>> accessed 8 June 2025.

¹¹² <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

fifth of NRM referrals involved county lines children.¹¹³ This has transformed the NRM into a mechanism with significant influence on whether a child should be considered a victim or a criminal. Despite this important role, the UK Independent Anti-Slavery Commissioner at the time, Dame Sara Thornton, found that some referrals took up to two years to be decided.¹¹⁴ This results in children being in a limbo situation where they are unaware of whether they will have the status of victim or criminal. Furthermore, when a child does get apprehended, constabularies and social services are unsure which authority should make the NRM referral.¹¹⁵ Should it be the constabulary where the child was apprehended? Their local constabulary? Or social services, to whom the child may already be known? Due to the lack of guidance on this provided by the government, this contributes to the uncertainty a child will experience while awaiting their NRM outcome.

The creation of the SCA was to create a singular body responsible for making NRM decisions. Previously, decisions were made by the National Crime Agency or UK Visas and Immigration.¹¹⁶ This reform streamlined the process of NRM decisions; however, further reforms are necessary. Following *DPP v M*,¹¹⁷ a positive NRM decision, meaning an acknowledgment that the victim was a victim of modern slavery, was held admissible as evidence that a victim of slavery was coerced into committing an offence and that it was the prosecution's burden to disprove the NRM.¹¹⁸ It resulted in the acquittal of a 15-year-old charged with

¹¹³ Caluori J, 'No right move? Devolving decision making for criminally exploited children' (2021) Crest Advisory <<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>> accessed 8 June 2025.

¹¹⁴ Thornton S, 'Independent Ant-Slavery Commissioner Annual Report 2019-2020' (2020) Independent Anti-Slavery Commissioner. <https://assets.publishing.service.gov.uk/media/5f632db6d3bf7f723d08bf1f/CCS207_CCS0520602790-001_IASC_Annual_Report_2019-2020_Web_Accessible_final.pdf> accessed 14 September 2025.

¹¹⁵ Caluori J, 'No right move? Devolving decision making for criminally exploited children' (2021) Crest Advisory <<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>> accessed 8 June 2025.

¹¹⁶ Home Office and Newton S, 'Modern Slavery Victims to Receive Longer Period of Support' (*GOV.UK*, 26 October 2017) <<https://www.gov.uk/government/news/modern-slavery-victims-to-receive-longer-period-of-support>> accessed 14 September 2025.

¹¹⁷ *DPP v M* [2020] EWHC 3422.

¹¹⁸ 'Section 45 of the Modern Slavery Act: Evidence Review' (*Modern Slavery PEC*, 7 April 2022) <<https://www.modernslaverypec.org/resources/section-45-modern-slavery-act-review>> accessed 14 September 2025.

possession of a bladed weapon and Class A drugs.¹¹⁹ Later, the ruling was overturned by *R v Brecani*,¹²⁰ holding that NRMs are no longer admissible in criminal court proceedings as evidence in support of a s.45 defence because the factors leading to positive decisions are not rigorous enough, causing the court to deem the SCA a non-expert opinion. The decision in *Brecani* was based upon evidence on the defendant's mobile phone that the CPS possessed which contradicted the SCA, who had made their decision based upon the defendant's statements as they did not have access to the contradicting evidence provided by the mobile phone.¹²¹ Currently, the NRM is not as beneficial or impactful as it could be if it were considered an expert opinion.

To reinstate the authority of the SCA, multi-agency collaboration must be improved by implementing better communication with police and the CPS must be authorised to allow the SCA access to all evidence regarding an NRM claim before making a decision. This will allow the decision to be deemed an expert opinion because all available information is accessible to the SCA. By implementing reforms that better the communication between different branches of government, the NRM decision will be more meaningful and carry more weight. With increased access to evidence, it may result in more evidence needing to be processed before a decision is made, however, irrefutable evidence, rather than relying on statements, would allow conclusions to be reached a lot faster, which is evidenced by the CPS pursuing its case against *Brecani* due to the undeniable evidence that the defendant was not a victim of trafficking. Had this evidence been available to the SCA, their decision could have been reached faster and been correct. Currently, a positive NRM decision is admissible as an indication of a victim suffering modern slavery, but it is not strong enough to be considered proof and fulfil the s.45 defence. Moreover, as the original intention of NRMs was focused on trafficked non-British nationals, the NRM should be split to have a section catered specifically towards victims forcibly involved with county lines, rather than being part of the original system intended for people trafficked into the UK. Implementing these reforms is both necessary and logical, as there is no

¹¹⁹ Caluori J, 'No right move? Devolving decision making for criminally exploited children' (2021) Crest Advisory <<https://www.crestadvisory.com/post/no-right-move-devolving-decision-making-for-criminally-exploited-children>> accessed 8 June 2025.

¹²⁰ *R v Brecani* [2021] EWCA Crim 731.

¹²¹ *R v Brecani* [2021] EWCA Crim 731.

reason that the SCA should have access to evidence required for accurate decision-making restricted and its current lack of legal authority diminishes its purpose.

3.0 – Devolution

Devolution is a continuous process and the incumbent Welsh government confirmed, in response to an FOI, that devolving criminal justice and policing is a ‘firm ministerial commitment,’¹²² believing that it would allow county lines in Wales to be better tailored to the unique Welsh context. It must be acknowledged that addressing county lines will continue to occur with or without a devolved police force, but the issue is that Wales should have a choice in whether it wants a devolved police force, which the Welsh Labour government supports, and the advantages this can provide that improve the current policing system tackling county lines within Wales.

3.1 – Benefits of devolving criminal justice and policing

Perhaps the most impactful benefit of devolving criminal justice and policing to the Senedd would be the ability to create a tailored Welsh agenda on tackling county lines. A problem with the current county lines approach is that runners, elders, and vulnerable adults, including victims of cuckooing, are unable to apply for the s.45 defence due to Schedule 4.¹²³ Therefore, the urgency of passing the Crime and Policing Bill is evident. Rarely are the leaders of USG/OCGs actually charged, which is due to the large resources required to allow for a successful prosecution to occur.¹²⁴

The landscape in Wales is unique and different to England. Therefore, strategies set to tackle county lines in the jurisdiction of England and Wales will unavoidably have a focus on England due to England having 39 constabularies compared to Wales’s four.¹²⁵ These strategies, like the County Lines Programme, will consequently struggle to sufficiently address the different Welsh circumstances than a Welsh Parliament

¹²² See Appendix B.

¹²³ Modern Slavery Act 2015, Schedule 4.

¹²⁴ Moyle L, ‘Situating Vulnerability and Exploitation in Street-Level Drug Markets: Cuckooing, Commuting, and the “County Lines” Drug Supply Model’ (2019) 49(4) *Journal of Drug Issues* 752.

¹²⁵ ‘UK Police Forces’ (*Police.uk*) <<https://www.police.uk/pu/contact-us/uk-police-forces/>> accessed 20 September 2025.

would. This was confirmed in a 2025 evaluation of the County Lines Programme, which stated that the impact in importer areas, and Wales is an importer area, was 'relatively minimal.'¹²⁶ This does not diminish the positive impact it has had on urban exporter areas, lying outside of Wales, but does demonstrate the need to foster different strategies. A notable difference between communities in Wales and England are that Welsh communities are far more rural,¹²⁷ meaning that approaches focused on countering county lines from exploiting children in urban areas would be less applicable in Wales because fewer urban areas exist. Such a difference is notable due to the rise in local children being recruited.¹²⁸ Therefore, strategies aimed at addressing the recruitment of children in urban areas are less applicable.

Besides policing and the criminal justice system, many other areas involved in tackling county lines are already devolved, like 'health, education, substance misuse, social care and accommodation.'¹²⁹ The differences in the approaches of the Senedd and Westminster in areas that are devolved to Wales is noticeable when comparing the Senedd's spending on devolved services compared to their English counterparts. This demonstrates the distinctive agenda of the Welsh Parliament compared to Westminster, particularly in education. A clear link exists between truancy and, generally, trouble with school and children being recruited into county lines.¹³⁰ To combat this, improving attendance is a key focus of the Welsh Cabinet Secretary for Education, Lynne Neagle, and this link is acknowledged by the Welsh government.¹³¹ Wales invested £2.5 million into its Education Welfare Service, which addresses truancy by supporting

¹²⁶ 'Evaluation of the County Lines Programme' (GOV.UK, 30 September 2025)

<https://www.gov.uk/government/publications/evaluation-of-the-county-lines-programme/evaluation-of-the-county-lines-programme?utm_source=chatgpt.com> accessed 5 June 2025.

¹²⁷ Office for National Statistics, 'The 2021 Rural Urban Classification of Statistical Geographies, England and Wales' (Ons.gov.uk, 6 March 2025) <<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.ons.gov.uk/methodology/geography/geographicalproducts/ruralurbanclassifications/2021ruralurbanclassification&ved=2ahUKEwiqv87sql-QAxVyXEEAHbMPPGfEQFnoECBgQAQ&usg=AOvVaw3jNcRdQx06Z6lcD2uGonYR>> accessed 20 August 2025.

¹²⁸ National County Lines Coordination Centre, 'County Lines Strategic Threat Risk Assessment' (NPCC, 2024) 20 <<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/county-lines-strategic-threat-risk-assessment.pdf>> accessed 26 September 2025.

¹²⁹ See Appendix B.

¹³⁰ Children's Commissioner, 'Keeping kids safe' (Children's Commissioner, February 2019) <<https://assets.childrenscommissioner.gov.uk/wpuploads/2019/02/CCO-Gangs.pdf>> accessed 25 September 2025.

¹³¹ See Appendix B.

children to attend school and resolving issues that affect their attendance.¹³² Moreover, the Senedd strongly support Community Focused Schools, which are unique to Wales and are schools that engage with ‘families, communities and multi-agencies to support the needs of their learners and families and benefit the wider community [...] from pre-school until post-16.’¹³³ A central part of this is the work of Family Engagement Officers (FEOs), who act as a ‘bridge’¹³⁴ between schools, families, and communities to identify the causes of issues like children skipping school.¹³⁵ FEOs exist in a far larger capacity than they do in England and are state-supported by the Welsh government, whereas they are not in England. Moreover, FEOs in Wales are mandated to engage with the police and other services to ‘enhance’¹³⁶ their understanding of child exploitation, including county lines.¹³⁷ Due to the important role of FEOs, the Senedd committed £9.5m for 2025-26 to recruit and retain more FEOs.¹³⁸ England, on the other hand, does not have state-supported FEOs,¹³⁹ demonstrating differences in how the governments of England and Wales go about tackling county lines in areas that are devolved.

There has been a reduction in runners from urban exporter areas following intensive police action.¹⁴⁰ Among their actions included constabularies working with charities; police delivering presentations to primary schools; running webinars for parents and carers; and greater multi-agency collaboration, like Social Care working to increase police officers’ awareness on county lines.¹⁴¹ This has resulted in a reduction of children being groomed from common exporter areas, however, caused in an inverse increase

¹³² See Appendix B.

¹³³ Ibid.

¹³⁴ Ibid.

¹³⁵ Ibid.

¹³⁶ Ibid.

¹³⁷ Ibid.

¹³⁸ Ibid.

¹³⁹ Sarjeant S and Egan D, ‘The Importance of Engaging Families and the Wider Community in Children’s Learning: A Welsh Perspective’ (*My College*, 26 September 2023)

<https://my.chartered.college/impact_article/the-importance-of-engaging-families-and-the-wider-community-in-childrens-learning-a-welsh-perspective/> accessed 22 September 2025.

¹⁴⁰ National County Lines Coordination Centre, ‘Disrupting County Lines Policing Strategy 2024-2027’ (*National Police Chiefs’ Council*, 2024) 11

<<https://cdn.prgloo.com/media/748eae528e9b4b609551b3772f6330ff.pdf>> accessed 18 September 2025.

¹⁴¹ National County Lines Coordination Centre, ‘Disrupting County Lines Policing Strategy 2024-2027’ (*National Police Chiefs’ Council*, 2024) 11

<<https://cdn.prgloo.com/media/748eae528e9b4b609551b3772f6330ff.pdf>> accessed 18 September 2025.

in recruitment of children from rural importer areas.¹⁴² The propensity to get involved in county lines in the countryside is arguably higher than for children from urban areas. Since 2009, over 750 youth clubs have closed.¹⁴³ This removes a valuable space for children to socialise and also a connection with an adult responsible for safeguarding children at the youth club, which leads to boredom that can be exploited. USG/OCGs are aware of this and also take advantage of the lack of CCTV and unmanned train stations in rural areas.¹⁴⁴ Internal lines are greatly increasing, at a rate of 232% annually, while county lines are steadily decreasing, 12.2% annually.¹⁴⁵ Consequently, it is 'likely' that local children will be targeted as the 'business model shifts' to localised lines.¹⁴⁶ Police have reported less children being involved in local lines, however, that is 'highly likely'¹⁴⁷ due to under-reporting, which exists with statistics for county lines children too, rather than a lack of involvement. This is because children will not be travelling as far as county lines, resulting in them not missing from home for longer periods, which would normally be recognised as involvement in county lines.

North Wales and South Wales are two key importer areas throughout the country,¹⁴⁸ therefore, a shift to localised lines will likely result in an increased exploitation of local children in these areas. Allowing the

¹⁴² National County Lines Coordination Centre, 'County Lines Strategic Threat Risk Assessment' (NPCC, 2024) 20 <<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/county-lines-strategic-threat-risk-assessment.pdf>> accessed 26 September 2025.

¹⁴³ 'County Lines in the Country' (*The Children's Society*, 17 January 2022) <<https://www.childrensociety.org.uk/what-we-do/blogs/county-lines-in-the-countryside>> accessed 15 July 2025.

¹⁴⁴ 'County Lines in the Country' (*The Children's Society*, 17 January 2022) <<https://www.childrensociety.org.uk/what-we-do/blogs/county-lines-in-the-countryside>> accessed 15 July 2025.

¹⁴⁵ 'County Lines Becoming More Localised' (*National Police Chiefs' Council*, 5 November 2024) <https://news.npcc.police.uk/releases/county-lines-are-changing-to-become-more-localised-reveals-new-county-lines-strategic-threat-risk-assessment?utm_source=chatgpt.com> accessed 27 September 2025.

¹⁴⁶ National County Lines Coordination Centre, 'County Lines Strategic Threat Risk Assessment' (NPCC, 2024) 20 <<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/county-lines-strategic-threat-risk-assessment.pdf>> accessed 26 September 2025.

¹⁴⁷ National County Lines Coordination Centre, 'County Lines Strategic Threat Risk Assessment' (NPCC, 2024) 32 <<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/county-lines-strategic-threat-risk-assessment.pdf>> accessed 26 September 2025.

¹⁴⁸ National County Lines Coordination Centre, 'County Lines Strategic Threat Risk Assessment' (NPCC, 2024) 14 <<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/county-lines-strategic-threat-risk-assessment.pdf>> accessed 26 September 2025.

Senedd to directly address this oncoming shift is prevented by having to wait for national strategies to be set. Furthermore, local authorities are bound by Welsh legislation to provide people with information and accessing care and support that they may need,¹⁴⁹ however, this is complicated by the lack of control the Senedd has over the police, despite this being a provision that any exploited child or vulnerable adult would need access to. The County Lines Programme, as aforementioned, has had a 'relatively minimal' impact on importer areas, which Wales belongs to. Therefore, allowing the Senedd to set its own strategies would enable this to be addressed at a quicker rate than is currently possible and make its existing legislation more cohesive. The urgency of this is noticeable in Wales too, as deaths from the synthetic opioids nitazene and xylazine are three times higher in Wales than in England¹⁵⁰ and synthetic opioid use is set to rise.¹⁵¹ Admittedly, Police and Crime Commissioners (PCCs) are able to set an agenda, a 'police and crime plan,'¹⁵² on key policing objectives within their constabulary, which could include county lines, and also local lines. However, the application of this depends entirely on the PCC and it is more reasonable to have a centralised approach set by the government than relying on PCCs, which could result in an asymmetrical system throughout Wales. Moreover, the existence of PCCs further reinforces the 'postcode lottery' critique that how county lines are approached depends entirely on the constabulary that an exploited child is apprehended in.

The Senedd's ability to change strategies in areas where the Welsh government opposes Westminster is another benefit, while currently they are powerless regarding policing. Practical examples of this in the past already exist: the Welsh government opposed the Police, Crime, Sentencing and Courts Act 2022, however, was helpless in opposing it and had to abide and draft statutory guidance on it.¹⁵³ Likewise, the Welsh

¹⁴⁹ Social Services and Well-being (Wales) Act 2014, s 17(1).

¹⁵⁰ Office for National Statistics, 'Deaths related to drug poisoning in England and Wales: 2023 registrations' (*Office for National Statistics*, 23 October 2024) <<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/deathsrelatedtodrugpoisoninginenglandandwales/2023registrations>> accessed 27 August 2025.

¹⁵¹ Home Office, 'New Local Guidance to Tackle Synthetic Opioid Threat' (*GOV.UK*, 12 May 2025) <<https://www.gov.uk/government/news/new-local-guidance-to-tackle-synthetic-opioid-threat>> accessed 19 September 2025.

¹⁵² Association of Police and Crime Commissioners, 'What Does a Police and Crime Commissioner Do? - Roles and Responsibilities' (*Association of Police and Crime Commissioners*) <<https://www.apccs.police.uk/role-of-pcc/>> accessed 25 September 2025.

¹⁵³ Foulkes C and Ackland E, 'Preparing for the devolution of policing in Wales' (*Welsh Government*, 2024) <<https://www.gov.wales/preparing-for-the-devolution-of-policing.html>> accessed 15 July 2025.

constabularies' approach to county lines cannot be changed by the Senedd as Westminster controls policing. Therefore, new strategies for police forces cannot be implemented by the Senedd. This is particularly frustrating when new evidence is demonstrating that it would be favourable to adopt new strategies which focus more on extrafamilial exploitation, the near-universal form of exploitation of county lines children and vulnerable adults.¹⁵⁴ Social Care in Wales, a devolved area, are developing their understanding of extrafamilial harm and 'informing a more holistic approach' to 'acknowledge' that exploitation can come from outside of a family's circle of influence.¹⁵⁵ However, a similar strategy cannot be implemented by the Senedd among Welsh police constabularies. Therefore, the ability for the Welsh government to set its own policing strategies and divert from those of Westminster to both tailor its strategies to the Welsh context but also implement newer strategies at a faster rate than Westminster would be beneficial.

3.2 – Concerns on devolving criminal justice and policing

An immediate concern when discussing the devolution of criminal justice and policing to Wales in regard to county lines would be its impact on cross-border policing, as virtually all county lines runners travel between England and Wales.¹⁵⁶ A report by the Welsh government from 2024 found that it would be unlikely that any issues would emerge,¹⁵⁷ and the FOI highlighted the report's example of cross-border relations between English constabularies and Police Scotland.¹⁵⁸ The report also highlighted the potential benefits of enhancing cooperation between a devolved police system and other devolved areas, like social services and education.¹⁵⁹ This is already possible as nothing prevents the current Welsh constabularies from

¹⁵⁴ Firmin C, 'Relocation, relocation, relocation: home and school-moves for children affected extra-familial risks during adolescence' (Institute of Applied Social Research, University of Bedfordshire 2019) <<https://uobrep.openrepository.com/bitstream/handle/10547/623285/FINAL+relocation+Carlene+Firmin+accepted.pdf;sequence=2>> accessed 4 October.

¹⁵⁵ See Appendix B.

¹⁵⁶ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 11 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

¹⁵⁷ Foulkes C and Ackland E, 'Preparing for the devolution of policing in Wales' (*Welsh Government*, 2024) <<https://www.gov.wales/preparing-for-the-devolution-of-policing-html>> accessed 15 July 2025.

¹⁵⁸ See Appendix B.

¹⁵⁹ Foulkes C and Ackland E, 'Preparing for the devolution of policing in Wales' (*Welsh Government*, 2024) <<https://www.gov.wales/preparing-for-the-devolution-of-policing-html>> accessed 15 July 2025.

engaging in such a way, however, the Welsh constabularies are not under the control of the Senedd, meaning that any directives on how to conduct their operations would currently only be recommendations. Whereas if the Welsh constabularies were devolved to the Senedd, policies like enhancing cooperation with Social Care, health, and education would be mandatory. This was confirmed in the report commissioned by the Welsh government last year, which stated that ‘the need for effective alignment between the police and devolved services in Wales was seen as a crucial benefit of devolution’ due to the ‘relationship between criminality and the social causes of crime.’¹⁶⁰ A devolved police system in Wales that can operate alongside other devolved services will result in a system in Wales where policies set among services, like social services and health services, align with those set for the police.

The report on devolving policing in Wales highlights that there are currently still risks involved. One particular area of concern is funding.¹⁶¹ The Senedd receives a budget from Westminster for its annual operations, and currently policing is outside of that budget. Therefore, there is a risk that policing in Wales would experience a decline in the funding it currently receives if devolved. This may happen if the Senedd rerouted money intended for policing to other sectors, like healthcare or education.¹⁶² Wales has more poverty compared to England,¹⁶³ meaning there is a higher proportion of services that need an increase in funding compared to England. Therefore, because policing is not devolved, Westminster ensures every constabulary receives their required funding. However, if devolution occurred, then the budget of the police force may shrink if money were rerouted to other areas that also need investment, which is dangerous because it could lead to an increase in county lines as opposed to a decline if the police suffer funding cuts. The report also raises concerns with the exclusion of funding programmes for the police that Wales currently enjoys by being member of the England and Wales policing jurisdiction.¹⁶⁴ A notable funding programme is the aforementioned County Lines Programme. Exclusion from such initiatives could increase CCE.

¹⁶⁰Foulkes C and Ackland E, ‘Preparing for the devolution of policing in Wales’ (*Welsh Government*, 2024) <<https://www.gov.wales/preparing-for-the-devolution-of-policing.html>> accessed 15 July 2025.

¹⁶¹ Ibid.

¹⁶² Ibid.

¹⁶³ Wales Centre for Public Policy, ‘Poverty in Wales’ (*Wales Centre for Public Policy*, September 2022) <<https://www.wcpp.org.uk/wp-content/uploads/2022/09/Poverty-in-Wales-Policy-Briefing.pdf>> accessed 24 August 2025.

¹⁶⁴ Foulkes C and Ackland E, ‘Preparing for the devolution of policing in Wales’ (*Welsh Government*, 2024) <<https://www.gov.wales/preparing-for-the-devolution-of-policing.html>> accessed 15 July 2025.

Therefore, devolved policing would have to be represented in an increased budget for the Senedd to allow identical funding to be invested in policing.

There have been arguments for the merging of all four constabularies in Wales to become one united police force, similar to Scotland in 2013,¹⁶⁵ who merged their eight constabularies into one. This would be beneficial as it saves money that can be rerouted to more impactful areas. The Chief Constable for Dyfed-Powys explained how merging all forces would eliminate monetary waste caused by having four separate systems among the constabularies: ‘four HR systems, four IT systems, four systems for everything.’¹⁶⁶ Merging constabularies would also eliminate the possibility of having an irregular system where PCCs of the four different constabularies can set different strategies. The predominant argument against merging constabularies, which the PCC for South Wales, Alun Michael, made is that it distances the top of the police hierarchy from the officers on the streets and the civilians they are serving.¹⁶⁷ Moreover, Police and Crime Commissioners are held directly accountable by the electorate of the local area they are serving. This system is complicated by having one central police force because the electorate of the whole country would have to hold one PCC accountable, or not have any PCCs, like Scotland. Nevertheless, a unitary policing system removes the ‘postcode lottery.’ Examining the impact of merging constabularies in Scotland provides a framework on how this could apply to Wales. Scotland saved significant costs by merging constabularies,¹⁶⁸ however, drawbacks included rural areas feeling more cut-off as constabularies serving solely rural areas no longer existed.¹⁶⁹ Such an impact could be felt in Wales too if not addressed properly before a merger.

¹⁶⁵ ‘Wales Police Merger Backed by Gwent Chief Constable’ *BBC News* (2 April 2013) <<https://www.bbc.co.uk/news/uk-wales-22003288>> accessed 27 September 2025.

¹⁶⁶ “‘No Sense’ in Having Four Welsh Forces Says Police Chief as He Renews Calls for Merger’ *ITV News* (6 December 2023).

¹⁶⁷ “‘No Sense’ in Having Four Welsh Forces Says Police Chief as He Renews Calls for Merger’ *ITV News* (6 December 2023).

¹⁶⁸ ‘Police Reorganisation Has “Already Led to £72m Savings”’ *BBC News* (22 March 2014) <<https://www.bbc.co.uk/news/uk-scotland-26690304>> accessed 28 September 2025.

¹⁶⁹ ‘More than 100 Police Stations “Closed across Scotland in Past Decade”’ (*STV News*, 5 April 2022) <https://news.stv.tv/scotland/research-finds-140-police-stations-closed-across-scotland-in-past-decade?utm_source=chatgpt.com> accessed 28 September 2025.

There are also concerns about the impact on cross-border policing and the ability of a Welsh police force maintaining its relationship with English constabularies.¹⁷⁰ A centralised police force in Wales would remain supported by nationally coordinated policing objectives set by the NCA. Additionally, membership of the National Police Chiefs' Council (NPCC) could also be maintained, which includes police chiefs from every constabulary in Great Britain. The NPCC leads the National County Lines Coordination Centre, which aims to coordinate constabularies throughout the country on setting a strategy, where Wales would presumably also retain its membership. Finally, the NWROCU can be maintained because a centralised police force does not equate to dissolution of a ROCU. The area of North Wales would have to shift to only the relevant police offices being involved, rather than a constabulary, but the ROCU itself can be maintained. Similarly, the BTP would also not be affected. Although the BTP operates differently in Scotland, this is because of the Scots legal jurisdiction,¹⁷¹ making any changes to the BTP unnecessary because England and Wales remain in the same legal jurisdiction. If Welsh constabularies did merge, appropriate measures would have to be implemented to avoid rural areas feeling cut off. However, regardless of whether the constabularies merge or not, currently, any discussion about merging police forces is not possible due to the Police Act 1996 s.32,¹⁷² which only allows the Secretary of State to make changes to police areas. Therefore, restrictions on devolution prevent the Senedd from pursuing a devolved police force and making the decision itself on whether it wants its police forces to merge, ultimately inhibiting the Senedd from setting its own policing agenda.

4.0 – Recommendations

There are a number of recommendations that can be made on addressing county lines. A lot can be reformed which this report has already alluded to, however, costs and political limitations constrain this. Therefore, the following are reforms that are realistically implementable by the Welsh government based on its currently devolved powers.

¹⁷⁰ Foulkes C and Ackland E, 'Preparing for the devolution of policing in Wales' (*Welsh Government*, 2024) <<https://www.gov.wales/preparing-for-the-devolution-of-policing.html>> accessed 15 July 2025.

¹⁷¹ 'Scotland' (*British Transport Police*) <<https://www.btp.police.uk/lt/local-teams/scotland/>> accessed 28 September 2025.

¹⁷² Police Act 1996, s 32.

The Welsh government should coordinate two of its devolved sectors, Social Care and education, with the BTP to create dedicated truancy officers. If a ticket inspector reports a minor travelling alone during a school day without a reasonable reason to miss school that they can prove, like a wedding or funeral, they should report this to a database shared between the services. A truancy officer can investigate whether that child is known to Social Care and determine the likelihood that child is involved in county lines. Based on such a decision, Social Care can put in place adequate measures to safeguard that child from further exploitation. This can also support the NRM process, providing additional evidence to support a positive decision. Moreover, a truancy officer can also inspect whether that child has already received an NRM referral, because only receiving a referral does not guarantee a stop to further involvement with county lines. To support this, unauthorised absences from school should be reported so that children travelling during school times that the ticket inspector reports would indicate a match for the truancy officer. Such collaboration between agencies, which is currently one of the large failures in tackling county lines, would be an effective counter.¹⁷³

To provide further support, impactful awareness campaigns that were run in Merseyside and Manchester¹⁷⁴ should be replicated in Wales, particularly importer areas, where children are increasingly at risk of being exploited.¹⁷⁵ An American study found that the certainty of being caught is a stronger deterrence than the severity of the punishment.¹⁷⁶ Therefore, if awareness campaigns convey this effectively, the number of children in county lines should reduce. Moreover, this policy must be strongly emphasised in more deprived

¹⁷³ Blakeburn M and Smith R, 'Exploring the role of the British Transport Police in responding to 'County Lines' drug markets: Enforcement and safeguarding perspectives' (2020) 94(2) *The Police Journal* 254.

¹⁷⁴ National County Lines Coordination Centre, 'Disrupting County Lines Policing Strategy 2024-2027' (*National Police Chiefs' Council*, 2024) <<https://cdn.prgloo.com/media/748eae528e9b4b609551b3772f6330ff.pdf>> accessed 18 September 2025.

¹⁷⁵ National County Lines Coordination Centre, 'County Lines Strategic Threat Risk Assessment' (*National Police Chiefs' Council*, 2024) <<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/county-lines-strategic-threat-risk-assessment.pdf>> accessed 26 September 2025.

¹⁷⁶ 'Five Things about Deterrence' (*National Institute of Justice*, 5 June 2016) <https://nij.ojp.gov/topics/articles/five-things-about-deterrence?utm_source=chatgpt.com> accessed 25 September 2025.

areas as these are where the majority of county lines runners and elders are recruited from,¹⁷⁷ meaning that schools in these areas must be strict on reporting unauthorised absences to the database that a truancy officer would use. Additionally, if children understand the likelihood of the violence and CSE they will experience working in county lines coupled with a high prospect of being caught, this will prevent children from joining county lines in the first place. Therefore, improving the ability of social services to engage with runners via the use of awareness campaigns and truancy officers would be invaluable. There is no normalcy in a young child being alone on a train during a time where they are supposed to be in school, and strong multi-agency collaboration can address this.

The NRM being reformed to have a separate referral mechanism for county lines will improve its role and the SCA should have full access to all of the evidence available to other agencies regarding a case. However, the probability that the NRM will be reformed nationwide is unlikely. Nevertheless, the Senedd can create a replica of it that applies only within Wales. When a child is referred to this 'Welsh NRM,' the relevant social services in both Wales and England can be made aware of it. The exploitation of children in Wales can include urban areas, however, as Wales is overwhelmingly rural it is important to put in place mechanisms that protect them, as the County Lines Programme failed to do this.¹⁷⁸ Factors that immediately indicate county lines, like a child missing for several days and returning either very confident because of money they have earned or with their confidence shattered due to experiencing violence is a clear indication of county lines that should lead to a referral.¹⁷⁹ The result of receiving a 'Welsh NRM' must provide an exit mechanism for the exploited child or vulnerable adult. The current NRM can take up to two years for a decision to be made, and, at that point, exploitation will play a far larger role in the child's life.¹⁸⁰

¹⁷⁷ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 12 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

¹⁷⁸ 'Evaluation of the County Lines Programme' (GOV.UK, 30 September 2025) <https://www.gov.uk/government/publications/evaluation-of-the-county-lines-programme/evaluation-of-the-county-lines-programme?utm_source=chatgpt.com> accessed 5 June 2025.

¹⁷⁹ Maxwell N and Wallace C, 'County Lines: a co-ordinated Welsh community response to child criminal exploitation' (2021) 24 Cascade Children's Social Care Research and Development Centre <<https://cascadewales.org/wp-content/uploads/sites/3/2023/03/Child-Criminal-Exploitation-in-Wales-2021.pdf>> accessed 5 June 2025.

¹⁸⁰ Thornton S, 'Independent Anti-Slavery Commissioner Annual Report 2019-2020' (2020) 14 Independent Anti-Slavery Commissioner.

Therefore, a 'Welsh NRM' must process referrals significantly faster to ensure a child can gain access to safeguarding measures immediately. Moreover, reintegration into school and providing access to jobs or apprenticeships must be a key focus of Social Care to support the child or vulnerable adult in reintegrating into a life outside of county lines. A 'Welsh NRM' allows the Senedd to create an effective strategy to protect county lines exploited children and vulnerable adults within its current legislative framework.

Conclusion

County lines continue to harm thousands of children and vulnerable adults, leaving an indelible taint of violence and coercion throughout the urban and rural parts of the country. The impact of strategies aimed at addressing this, like the County Lines Programme, have had a positive impact in England, however, remain unsuited to Wales's rural context. The Social Services and Well-being (Wales) Act 2014 make it a legislative obligation for devolved services to cooperate with each other to protect children and vulnerable adults, but the absence of devolved police forces hinders its applicability. As the understanding of drug trafficking continues to change and update, effective responses by government services ranging from the police, education, healthcare and social services are needed to counter this. Devolving criminal justice and policing will allow the Senedd to directly address county lines in its Welsh context to promote multi-agency collaboration and enhance efforts already implemented by existing devolved services, which remains increasingly relevant as children continue to be exploited and drug use continues to rise.

<https://assets.publishing.service.gov.uk/media/5f632db6d3bf7f723d08bf1f/CCS207_CCS0520602790-001_IASC_Annual_Report_2019-2020_Web_Accessible_final.pdf> accessed 14 September 2025.

Glossary

Alpha Victim:	A person who is a victim of exploitation but has also perpetrated exploitation upon others
BTP:	British Transport Police
CCE:	Child Criminal Exploitation
CFE:	Child Financial Exploitation
CSE:	Child Sexual Exploitation
Cuckooing:	A vulnerable adult has their home unwillingly controlled by others for criminal purposes
Elder:	An older adolescent or young adult who recruits runners and traffics drugs, often also an alpha victim
NRM:	National Referral Mechanism
OCG:	Organised Crime Group
Plugging:	A form of Child Sexual Assault that runners may experience where drugs are concealed in wrappers or condoms in the gastro-intestinal tract
Runner:	Typically a young adolescent who traffics drugs, weapons, or cash across counties on behalf of an Urban Street Gang or Organised Crime Group
USG:	Urban Street Gang

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Appendix A

Emails that I sent to Welsh Labour on their policies and to the Senedd's Secretary for Education, Lynne Neagle, and Secretary for Children and Social Care, Dawn Boden.

Email to Welsh Labour

Title: What is Welsh Labour's approach to tackling county lines in Wales?

Dear Welsh Labour,

I hope you are well. My name is Dylan Eberhard and I am a law student at the University of Leeds. Before university, I attended Atlantic College in St Donats, the same school Eluned Morgan attended. I am undertaking research for the Laidlaw Foundation through the university. My research project is on the causes of county lines in Wales and potential solutions, like whether devolution should be expanded to allow the Senedd to legislate on policing and crime, allowing the creation of a tailored Welsh approach to tackling county lines.

As part of this research, I am reaching out to understand how the major political parties in Wales would approach tackling county lines if they were in power. I am especially interested in your party's current strategy, particularly the role of Welsh Labour in the ongoing County Lines Programme, which began in July 2024?

I am also interested in how Welsh Labour is dealing with county lines specifically in Wales, outside of the nationwide County Lines Programme? Has Welsh Labour created a separate Wales-focused strategy? If so, what is this strategy and has it yielded successful results so far?

Thank you for taking the time to answer my question. If you need further clarification or wish to contact me, please do not hesitate to email.

Best regards,

Dylan Eberhard

Email to the Secretary for Education and Secretary for Children and Social Care

Dear Lynne Neagle and Dawn Boden,

I hope you are well. My name is Dylan Eberhard and I am a law student at the University of Leeds. Before university, I attended Atlantic College in St Donats, the same school Eluned Morgan attended. I am undertaking research for the Laidlaw Foundation through the university. My research project is on the causes of county lines in Wales and potential solutions.

As part of this research I am reaching out to understand how Welsh Labour is working towards tackling this. I am interested in whether your departments have developed strategies to better address truancy, including both preventing students from leaving school in the first place and retaining students who have experienced truancy due to county lines grooming? Additionally, have you developed strategies to better protect children in care homes, who are more likely to be groomed into county lines than children who are not in care?

Cascade (Children's Social Care Research and Development Centre), which the Welsh government funds, criticised the high turnover rate among social care workers, because if a child constantly has a new worker responsible for them, they are unlikely to reveal their exploitation due to a lack of trust. Therefore, has Welsh Labour taken steps to address this?

Cascade also reported that children placed in Pupil Referral Units are more prone to being groomed into county lines because their exploiters increase their sentiment of self-worth, which the Pupil Referral Unit has decreased. What steps has Welsh Labour taken to address this?

The current approach of social care is based upon intrafamilial (domestic) abuse and often leads to parents of groomed county lines children being treated as suspects despite their innocence. County lines falls outside of the intrafamilial boundary, therefore, has your department taken steps to create a more holistic approach that includes extrafamilial harm and avoids alienating parents?

Thank you for taking the time to answer my questions. If you need further clarification or wish to contact me, please do not hesitate to email.

Best regards,

Dylan Eberhard

Appendix B

Email from the Welsh government answering the questions from both email I had sent them (see Appendix A).

Ein cyf/Our ref - TO/JH-/00567/25

Welsh Government

07 July 2025

Dear Dylan,

Thank you for your emails of 15 June 2025, which have been passed onto Welsh Government Community Safety Division for response.

Justice is not yet devolved in Wales, but in practice devolved services such as health, education, substance misuse, social care and accommodation play an important role in the operation of the criminal justice system.

Effective collaboration with our counterparts in the UK Government allows us to share the unique Welsh justice landscape and ensure that consideration is given for the design and delivery of justice services in Wales. Our ambition is to minimise ineffective justice provision which lets down vulnerable people in the system in Wales and misses opportunities for support and change.

We work closely with Her Majesty's Prison and Probation Service (HMPPS), the Youth Custody Service (YCS), Youth Justice Board (YJB), Public Health Wales (PHW), Welsh Health Boards and other non-devolved and devolved agencies to progress our commitments to reduce crime and support families in order to build strong and resilient communities in Wales.

Pursuing the devolution of policing remains a firm ministerial commitment within our Programme for Government and we believe devolving policing would enable issues such as county lines to be properly tailored to Welsh circumstances.

You may be interested in [the review on the devolution of policing](#) undertaken by an independent team led by retired Chief Constable, Carl Foulkes last year.

While the issue of county lines was not explicitly explored, cross-border policing issues were considered. Although the review did not recommend an approach, no significant issues with potential cross-border arrangements under devolution were identified, with the review noting cross-border arrangements in Scotland remain good with positive collaboration between devolved and non-devolved agencies.

Until criminal justice is devolved to Wales, effective intergovernmental working is essential to improve the issues caused by the 'jagged edge' of devolution, working across jurisdictions to deliver services to those in contact with the justice system.

The Welsh Government works collaboratively with partner agencies, including both devolved and non-devolved public services, law enforcement and the third sector, on tackling exploitation and supporting people with lived experience. This includes engagement with the UK Government on the Crime and Policing Bill.

The Welsh Government organises the Anti-Slavery Wales Forum and its thematic working groups. Additionally, the Welsh Government organised a national workshop in March 2025 in collaboration with partner agencies on the Welsh response to the criminal exploitation of children.

Additionally, improving attendance continues to be a key focus for the Cabinet Secretary for Education and work is ongoing to improve the rates to pre-pandemic levels.

The reasons for absence are varied and complex. These could include mental health and wellbeing, availability of specific learning support services, and the ever-rising cost of living and attitudes of parents and learners towards school attendance generally. There is also a strong link between school attendance and attainment. Children need to be in school, engaging with their learning and the wider opportunities available to them if they are to thrive and meet their potential.

However, in all cases, children need support to re-engage with their education and start attending school regularly. Schools across Wales are providing this support daily, with teachers and other pastoral roles working with learners. Family Engagement Officers are also vital in ensuring that positive partnerships are created, and that bespoke support is offered.

We have invested £2.5 million into the Education Welfare Service this year, to provide much needed additional capacity. This will enable the service to provide earlier support, before issues escalate, and to provide more intensive support to learners with high absence rates. Furthermore, the Welsh Government's approach to Community Focused Schools (CFS) ensures schools engage with families, communities and multi-agencies to support the needs of their learners and families and benefit the wider community. This is part of a sustained and whole systems approach that supports children and young people from pre-school through to post-16.

Earlier this year, we published multi-agency guidance for schools, to help them collaborate effectively with other key services and agencies to ensure that all children are supported, thrive and learn; share information so that children and young people and their families are able to access the appropriate support at the right time; and support access to wider services which may be co-located in a school premises or located elsewhere within the community.

Family Engagement Officers (FEOs) are a key element of the CFS approach. FEOs understand the services and organisations which are involved in their community so that they can best utilise and share their assets and work as a bridge between schools, families and the wider community to bring them together and identify any issues at an early stage. As part of this, the Welsh Government proactively engage our National Network of lead FEOs with the police and related services to enhance their understanding and engagement around issues associated with child exploitation and county lines. In 2025-26, we are providing £9.5m across Wales to support the recruitment and retention of FEOs.

The Welsh Government is committed to leading a range of work to improve the justice system and to promote a distinctly Welsh version of criminal justice and issues raised in this email will continue to be a priority in order to help keep people in Wales safe.

You have highlighted those traditional approaches to social care for children and young people focused on intrafamilial harm. Child protection processes remain the same, however, our developing understanding of exploitation and other extra familial harms informs a more holistic approach which acknowledges that there are often issues outside of the family's circle of influence and in these cases, there is a focus on supporting parents to understand these forms of harm, whilst mobilising multiple agencies to support the whole family to protect the child.

It is important to note that exploitation can involve family members or be facilitated by family members and therefore it is crucial that any interventions through the child protection process or other means are informed by thorough multi-agency assessment led by social services.

Kind regards,
Crime & Justice Team
Community Safety Division
Welsh Government