

**Written evidence submitted by Dr Paul Andell, Associate Professor of Criminology, University of Suffolk; Dr Paul Nelson, Lecturer in Criminology, Anglia Ruskin University; and DI Kelly Gray, National County Lines Co-ordination Unit (CWSB200)**

## **Submission of Written Evidence to the Children's Wellbeing and Schools Bill Committee**

**Subject: Addressing the Vulnerability of Looked After Children to Criminal Exploitation and the Risks of Unregulated Care Homes and Lodgings**

### **Background of Authors and Nature of the Submission**

The following evidence is provided for the Children's Wellbeing and Schools Bill Committee and is submitted individually as time constraints have prohibited the necessary official permissions from our organisations. However, the following gives a background of professional experience and knowledge of individual authors.

**Dr Paul Andell** is an Associate Professor of Criminology at the University of Suffolk. He is also a qualified social worker. Paul has an MA (with distinction) in Criminology, a Professional Doctorate in Youth Leadership and Youth Justice and publications in the fields of UK gangs, drug markets and child exploitation. Notably, he is the co-editor of the Palgrave UK Handbook of Youth Gangs (2023). Paul previously worked as a residential social worker; a probation officer, a group worker in youth justice, a facilitator and mentor in gang exit work and was the Communities Director for Brathay a youth leadership charity for who was responsible for the Brixton gang X-IT project. Paul was also Community Safety Manager for the Greater London Authority and a member of the London Criminal Justice Board. He is a current member of the All Party Political Group on Alcohol Drugs and Crime, the Eurogangs Research Group, current Chair of the European Network on Child Criminal Exploitation and advisor to the national Independent Advisory Group, Equal. Since 2009 he has undertaken research on violent youth gangs and acted as a consultant and researcher on youth gangs. The national charity, the Children's Society, Dame Carol Black's UK review of drugs and the National Independent Practice Review of County Lines utilised evidence from his research work. He is a current British Academy Innovation Fellow undertaking "action research" on responses to child criminal exploitation.

**Dr Paul Nelson** is a lecturer at Anglia Ruskin University's criminology team following a career in children's services. With a background in child protection, he has extensive experience supporting at-risk children and young people, particularly those vulnerable to criminal exploitation. Paul holds an MA in International Slavery Studies and a PhD in Criminology, with his doctoral research being the first in England and Wales to examine child protection practitioners' understanding of Child Sex Trafficking and the National Referral Mechanism. He collaborates with the International Policing and Public Protection Research Institute (IPPPRI) to investigate victim blaming and bias within child protection. He is actively involved in the Trusted Adult Scheme, working alongside child protection practitioners, academics, and youth support workers to enhance support for young people and strengthen ARU's civic engagement. Committed to increasing social mobility, he also champions initiatives that provide work readiness opportunities for students pursuing careers in statutory and third-sector children's services.

**DI Kelly Gray** has demonstrated an exceptional commitment to law enforcement, crime investigation, and leadership throughout her career, earning numerous commendations and

awards. Her expertise spans complex investigations into organised crime, drug supply, fraud, and burglary, with significant successes in dismantling County Lines networks and securing convictions in high-profile cases. As a leader, she has played a pivotal role in developing and succeeding regional disruption teams and multi-agency initiatives, receiving multiple Chief Constable and departmental commendations. She has been instrumental in shaping national policies for HMPPS, mentoring women in policing through the ERSOU Network of Women, and co-designing multi-agency reflective practice boards for improving responses to child criminal exploitation. In addition to her operational achievements, she has pursued extensive professional development, attaining qualifications in policing, teaching, crime investigation, and occupational learning, further solidifying her expertise in law enforcement strategy and training. Kelly is the author of several publications.

## **Introduction**

This submission seeks to highlight the grave vulnerabilities faced by looked-after children, mainly their increased susceptibility to criminal exploitation. Furthermore, it addresses the risks associated with the growing use of unregulated care homes and semi-independent accommodations for children in care. This evidence draws upon research, reports, and case studies to argue for urgent legislative reforms to protect these vulnerable young people.

Looked-after children (LAC) are at a disproportionate risk of exploitation, including involvement in "county lines" drug trafficking and other forms of criminal exploitation (Caluori, 2020). The systemic failures of unregulated care placements have exacerbated these risks, leaving children in precarious situations without the necessary safeguards. As evidenced by multiple reports from our research and practice, the Children's Commissioner and local authority reports, and parliamentary research, these placements often lack adequate oversight, enabling criminals to target and exploit children with impunity.

This submission will outline:

- 1. The vulnerability of looked after children to criminal exploitation.**
- 2. The risks associated with unregulated and illegal care placements.**
- 3. Failures in oversight and safeguarding in semi-independent accommodations.**
- 4. The urgent need for legislative and policy reforms.**

## **1. The Vulnerability of Looked After Children to Criminal Exploitation**

### **1.1 County Lines and Criminal Gangs**

Children in care are disproportionately targeted by criminal networks involved in county lines drug trafficking. These groups exploit children's vulnerabilities, coercing them into criminal activities under the guise of offering protection, financial gain, or a sense of belonging (Andell 2019).

According to the Howard League report *Victims, Not Criminals (2020)*, individuals operating county lines networks specifically prey on children in residential care due to their lack of close adult supervision and their susceptibility to manipulation. Exploited children are frequently moved between locations, cut off from support networks, and threatened with violence if they attempt to escape.

A major failure in the current system is the tendency to criminalise these children rather than recognise them as victims of exploitation. The police, social services, and care providers must adopt a more trauma-informed approach, prioritising safeguarding over punitive measures (Andell 2023).

## **1.2 Missing Children and Increased Risk of Exploitation**

A significant proportion of children in care go missing, increasing their exposure to criminal networks. The *Sexual and Criminal Exploitation of Missing Looked After Children (2019)* report highlights that a large number of LAC disappear from their placements, often multiple times, before being found are involved in criminal activities.

Andell and Pitts research (2017) recognises that missing children, especially those placed out-of-area, are at extreme risk of exploitation. However, despite guidance, many local authorities fail to provide adequate support to prevent recurring incidents or share sufficient information with statutory partners.

## **2. The Risks Associated with Unregulated and Illegal Care Placements**

### **2.1 Unregulated Accommodation: A Systemic Failure**

The increasing reliance on unregulated care settings has left thousands of children in accommodations without basic protections. The *Children's Commissioner's Report, Unregulated (2020)* found that one in eight children in care spent time in an unregulated placement in 2018-19, with this number growing annually.

Unregulated accommodation—often a poorly monitored setting such as hostels, flats, or even tents—does not require registration with Ofsted, meaning there are no mandatory safeguarding standards. This loophole allows private providers to profit while exposing children to significant dangers, including:

- **Lack of trained staff or appropriate supervision.**
- **Exposure to criminal influences within accommodations.**
- **No accountability for safeguarding failures.**

### **2.2 Illegal Care Homes**

Recent investigations by the Children's Commissioner's Office (2024) have uncovered many illegal children's homes operating without registration or oversight. These unregistered homes often house children with high-level needs but lack the trained staff and structures necessary to support them safely. Many of these accommodations are run by for-profit providers charging extortionate fees—sometimes exceeding £1 million per placement—without providing adequate care.

A lack of proper monitoring in these settings has led to numerous cases of neglect, abuse, and criminal exploitation (Andell and Pitts 2017). Without urgent intervention, the number of children placed in illegal care homes will continue to rise, further endangering their wellbeing.

### **3. Failures in Safeguarding and Oversight in Semi-Independent Accommodations**

#### **3.1 Lack of Regulation and Quality Control**

The fundamental distinction between "care" and "support" in semi-independent accommodation is misleading and harmful. The *Children's Commissioner's Report Unregulated (2020)* notes that many providers fail to meet even basic housing standards.

Reports indicate that some children placed in these accommodations have suffered severe neglect, with limited access to education, health services, or social workers. In the worst cases, children have been left unsupervised for extended periods, increasing their vulnerability to criminal exploitation.

#### **3.2 Exploitation and Abuse within Unregulated Settings**

Due to a lack of regulatory oversight, some care providers have been found to have criminal ties, with reports of accommodations being used as hubs for illegal activities. There are documented cases of children in semi-independent accommodations being recruited by gangs and used for drug dealing, theft, and other criminal activities (Caluori 2020).

We believe the government's current minimum standards is insufficient; full regulation and oversight of all care placements, regardless of the child's age, must be enforced to prevent such exploitation.

### **4. Recommendations for Urgent Legislative and Policy Reform**

Given the overwhelming evidence of systemic failure, we propose the following urgent actions:

#### **1. Abolish the Use of Unregulated Accommodation for Under-18s:**

- All looked after children should be placed in regulated, fully staffed care settings.
- Local authorities should be legally prohibited from using unregulated accommodations.

#### **2. Mandatory Registration and Oversight for All Care Homes:**

- All care homes, including semi-independent and unregulated settings, must be registered with Ofsted.
- Local authorities should be required to conduct routine inspections and enforce accountability.

#### **3. Improved Safeguarding and Multi-Agency Coordination:**

- Implement a trauma-informed approach to supporting LAC to reduce their risk of criminal exploitation.
- Increase training for care providers and law enforcement on identifying and addressing child criminal exploitation.

#### **4. Stronger Protections Against Criminal Exploitation:**

- Introduce national protocols for identifying and responding to children at risk of county lines exploitation.
- Ensure that missing children's cases are prioritised and adequately resourced.

## 5. End the Profit-Driven Model of Child Care Provision:

- Introduce price controls on private providers to prevent excessive profit-making at the expense of child welfare.
- Increase investment in state-run children's homes to reduce dependency on private care placements.

## Conclusion

The evidence presented in this submission demonstrates a clear and urgent need for reform. The continued use of unregulated accommodations, combined with systemic safeguarding failures, has placed thousands of looked-after children at extreme risk of criminal exploitation. Legislative action is critical to ensure that every child in care receives the protection, stability, and support they deserve.

We urge the Committee to immediately strengthen the Children's Wellbeing and Schools Bill, ensuring that no child is left vulnerable due to the system's failures.

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