

County Lines Vulnerability Tracker

Guidance

This document aims to provide a guide of how to use the Vulnerability Assessment Tracker (CLVT) in order to ensure consistent use across all users. The CLVT can be adapted to meet the needs of the area it is being implemented in.

Introduction

The CLVT aims to document and grade vulnerability of children and vulnerable adults who are criminally exploited for use in county lines or local drug dealing. The CLVT aims to provide a summary of risk for effective management by using key risk indicators. Each indicator has a “gravity” score, which adds up to generate a risk rating.

The CLVT is an information tracker. Information on the CLVT does not negate the requirement for it to be recorded on other police systems. It is a way of having relevant information on one document that is easily accessible and relevant.

Officers using the CLVT will aim to identify victims of criminal exploitation, divert subjects away from criminal activity, reduce vulnerability and/or gain intelligence. The CLVT is also used by police to encourage partner agencies to work together, share information and responsibility for subjects.

Creating the CLVT

Prior to populating the CLVT, the following things should be completed:

- The SLT should decide which strand of policing the CLVT will sit under and decide which model will be used, i.e. a fully staffed, full time CLVT team to manage all subjects or minimally staffed CLVT team and service level agreements for local neighbourhood officer, schools officer or any other relevant policing team. Staff allocation is key.
- Depending on which model is used, meet with Schools and NPT management to make them aware of the engagement requirement from their officers
- Confirm who will manage the CLVT itself and who will oversee/ supervise this
- Meet with the local authority - head of children’s service, community safety lead and head of YOS. Appraise them of what the tracker is and the multi -agency work which will follow – i.e. where it will be discussed and who the points of contact will be for regular updates between the police and their service
- Decide what conditions of entry and closing criteria will be used for referrals– Generally there will need to be a specific link to exploitation through county line, be that arrests in the counties, Intel etc.
- Set up a mailbox and shared calendar
- Provide training on what the CLVT is to officers, local authority staff and YOS, with a potential of extending to schools – They’ll need to know what it is, how and where to refer in
- Populating the CLVT comes last as there it would be ineffective to highlight and record vulnerable persons with no means to manage them effectively.

Access to the CLVT

The Live CLVT document will be saved on a police shared drive. A copy of the CLVT will be uploaded onto a searchable police intelligence database, which should be updated regularly. The CLVT front page can be shared with statutory partners and subject profiles can be requested if necessary.

CLVT Status

Each subject on the CLVT will have a status. It can be one of the following –

Open

Police/ statutory agencies should be forming a safeguarding strategy and engaging with the subject.

Missing

Given to 'Open' subjects who are currently wanted or missing. This increases their score and attention should be paid to the subject, as the score will change again when located.

In Custody

The subject is in custody which includes police/young offender institutes/prison. It could also include someone who is in a mental health institution under section, or in secure, local authority accommodation. The idea is to represent that they are not in the community and they will fall under the Monthly checks in addition to regular PINS checks when in prison to document and confirm release date and details. No engagement is expected to take place.

Transferred

The subject is transferred to another area or Constabulary for the engagement strategy to continue. An up to date Intelligence pack and/ or copy of their CLVT profile should be sent to the receiving area.

Closed

The subject is no longer being worked on with regards to the CLVT.

CLVT Scoring

Various factors affect the subject's gravity score. All of these factors are on the CLVT front page and add up to create the overall risk rating. Scoring is based on intelligence and incidents over the past six months.

Green

0-39 - Minimal evidence at present to indicate the vulnerable person is at risk of criminal exploitation

Amber

40-69 - Risk of criminal exploitation identified

Red

70+ - The risk of the subject being criminally exploited is high and a specialised response is required to reduce the risk; or the subject is already being criminally exploited, or is highly likely to be exploited imminently.

All the boxes can potentially be filled across the scoring criteria, depending on the information available over a six month period.

The only exceptions to this would be the following points, as a subject will either be one or the other:

- Known to social services and LAC – If a person is looked after by social services then they are clearly already known, negating the need to score both.
- NEET and Attendance – if a person is NEET they are not in education, employment or training, so naturally they will not be attending. Attendance indicates that they are enrolled in school/ college etc. but they may not be going 100 % of the time.

When the score is recorded on the Profile page or record of engagement, there should be a breakdown of why they have scored on each point. Equally when they are rescored at the relevant interval, there should be a brief explanation for why their score has changed or remained the same. This add clarity to the overall RAG rating.

If there are factors which may indicate that a subject should score more but there isn't the supporting intelligence or they should score less, due to interventions already in place; the manual scoring tab can be used. The rationale should be recorded on the profile with the score breakdown.

Referrals

Police and/ or statutory partners can make a referral to the CLVT. Referral officers are required to create a safeguarding report identifying the risk to the subject. Referrals to the CLVT should not be made as a disposal method.

Any referrals who are unsuitable for the CLVT will be recorded on the 'Referrals' tab and the referrer should be informed.

The CLVT Manager Role

The role of the CLVT manager is to have oversight and management of the CLVT. The role will be predominantly administrative but key to the functionality of the processes which follow its implementation. The CLVT does not hold risk, it aims to provide a summary of risk for effective management by using key risk indicators. It is a way for those coming to the attention of police and other statutory partners to track who is potentially being exploited through county lines; and in turn initiate an appropriate multi-agency response.

The CLVT manager sits within the child exploitation team, which may also be known as the CLVT team and will deal with any subject who scores red or is identified as a potential victim on a live operation/ investigation. The CLVT team will act as the conduit between that vulnerable person and the investigation team. They will work with partners to manage the subjects' welfare throughout and assist the investigating team with any enquiries related to the subject, which are not enforcement related. This team should have a vast working knowledge of the CLVT and the associated safeguarding processes.

The CLVT Managers' Responsibilities:

- Managing the mailbox
- Assessing and researching new referrals
- Creating new PNC markers and removing ones that are no longer applicable
- Checking whether or not a subject has been referred to the National Referral Mechanism (NRM)
- Establishing a point of contact within the NCA in relation to NRM
- Tasking the correct officers with follow on actions
- Following up tasking's if no update has been received by the review or other relevant date
- Running a daily intelligence check to see if any subjects have been circulated as wanted/ missing or if they have been located. It is recommended that a search string be created for regular Intelligence checks.
- Conduct multiagency meetings periodically to discuss any updates on subjects and new referrals
- Support engagement officers
- Ensuring the correct information is recorded on each profile page in detail
- Creating an intelligence report with the CLVT attached so it is on a searchable database
- Updating the CLVT at the correct intervals
 - Red subjects: Weekly
 - Amber subjects: Fortnightly
 - Green/ Closed subjects: Monthly

The format for updating the CLVT should be consistent throughout each profile for ease of reading and consistency across the document.

CLVT Mailbox

It is suggested that a dedicated CLVT inbox or email address is created.

All correspondence with the CLVT manager and/or the CLVT team should be sent through the CLVT mailbox and not to individual officers. This means that all information is accessible at all times by any member of the team.

CLVT Manager Diary

It is suggested that once a mailbox has been established, the shared calendar is utilised to record and remind the team/ supervisor of CLVT subject review dates, meetings etc. This can assist with general maintenance, short notice changes and absences. It allows anyone with access to the mailbox to see what actions are outstanding or impending.

Profiles and Updates

Profiles contain up to date information, important details and record police engagement/interaction in one place. The profile will record the reason for the referral, including details of referrer, followed by any incidents of note from past six months.

Any updates to be recorded on the profile should be sent to the CLVT mailbox. To make this manageable, updates should be written with the salient points so they can be copied directly onto profiles without editing.

Updates should always include the date, name of the person providing the update and sufficient information. Bullet points can be used to keep information concise.

IMPORTANT - NO SENSITIVE INTELLIGENCE/OPERATIONAL TACTICS SHOULD BE WRITTEN ON SUBJECT'S PROFILES. ANYTHING FOR POLICE EYES ONLY SHOULD BE RECORDED ON A SECURE POLICE SYSTEM AND THE REFERENCE NUMBER GIVEN ON THE UPDATE WITH A BRIEF DESCRIPTION.

PNC Markers

PNC markers are placed on 'Open' subjects, highlighting their vulnerability to county lines. It will request information of police interaction with the subject to be sent to the CLVT mailbox. Any information that comes into the mailbox will be added to profiles and forwarded to engagement officers and/ or Partners.

PNC markers allow information to be shared when a CLVT subject comes into contact with the police, particularly outside the force area. In addition to this, persons stopped with the CLVT subject who are not known within this context can also be assessed for suitability to be added to the CLVT, and documented accordingly. This helps to generate otherwise lost intelligence around the vulnerable person.

CLVT Closures

The closing report is the rationale as to why a subject no longer needs to be 'Open' on the CLVT and provides an outcome. The closing factors should be decided at the start of the CLVT implementation.

It is recommended that closures should be completed by the CLVT manager, following consultation with a supervisor. The closing report should contain sufficient rationale including any actions completed to safeguard or divert the subject. If there is insufficient information, follow up enquiries or taskings can be assigned.

Subjects can be closed for a variety of reasons. Examples of closing factors include but are not limited to:

- No recent intelligence or information to show that the subject is involved in county lines
- Escalating criminal behaviour and no signs of exploitation
- Repeated refusal to engage
- Enforcement is being pursued
- When engagement may interfere with an investigation
- The subject has moved from the area
- The subject is positively engaging with services or diversion schemes
- The subject is no longer associated to the organised crime network (OCN)

When a subject is closed on the CLVT, a closing report should be at the end of the record of engagement. The closing report should have as much detail as possible. Subjects can be reopened if new information comes to light to justify this.

Example of Closing Report

22/03/2018 – Closing Report example – PC Tom Jones 000CO

Alex Smith' open CLVT profile will be closed for the following reasons:

- **Vulnerability** – There is no new evidence to suggest that Alex is being sent out on county lines to facilitate supply of Class 'A' Drugs. I have met with Alex on numerous occasions and he has not disclosed any information that would suggest he is a victim of exploitation.
- **Diversion** – Attempts have been made to introduce Alex into diversionary organisations thus removing him from criminality. He has failed to arrive for pre-arranged appointments and stated on the phone that he does not want to engage further.
- **Criminality** – Alex is continuing to act in a criminal manner, most recently he was arrested for Robbery on 1st January 2018. He is also believed to be a recruiter for the 'Bad Boyz Gang'.
- **Living Situation** – Alex is a looked after child in Police Town who is regularly reported missing. The missing episodes are for short periods and Alex continues to frequent his affiliated gangs' territory.

Engagement Responsibilities

Allocation of subjects to officers should not dictate diversion of any risk owned elsewhere. For example, if the subject is also a missing person or a Child Sexual Exploitation (CSE) subject, the risk around that investigation still remains where it is. The ownership for the purposes of the CLVT is around the diversion and engagement of that vulnerable person.

Ideally there would be a specific child exploitation team or CLVT team, consisting of one Sergeant (PS/ DS) and five constables (PC/ DC), including the CLVT manager (minimum staffing level). Depending on the number of "Open" cases, this team would be able to manage all CLVT subjects, with minimal assistance from other departments. In instances where this is not possible the below model is advised.

Subjects with a Red score or involved in an active modern slavery investigation will usually be dealt with by the CLVT team or an investigation team. The CLVT team will work with the CLVT manager to manage the individuals, who will usually require a lot more interaction. This will be the same for working with partners. Their engagement will generally last much longer due to the nature and length of investigation and/ or the level of risk that the individual may be exposed to.

Subjects who score Amber or Green should be dealt with by Neighbourhood Policing Team (NPT), School Engagement (SE) or other applicable officers. Once the subject has been allocated to an officer, the officer's details should be sent to the CLVT mailbox. This person will be used as main point of contact.

Taskings can be created when NPT or SE officers are required to engage with subjects. Taskings will be ongoing and should not be shown as complete until it has been discussed with the CLVT manager.

If subjects are of school age, where applicable, they should be managed by SE officers. If subjects have poor attendance or are not attending at all, then the CLVT manager should be notified and the subject can be allocated elsewhere.

It is best practise to have the same officer assigned to a subject to ensure consistency with the ongoing engagement. All updates from tasking's or school engagements should be sent to the CLVT mailbox.

Engagement

The CLVT referral is initially scored based on research from police search indices from the last six months. This does not always provide a complete picture of what else may be going on with that individual. By

visiting home addresses, more information can be gleaned from the subject, their parents or guardians etc. This includes occasions where an individual has gone missing and the family has not reported it. Information gained from these engagements can be used to fill intelligence gaps and provide a more detailed overview of what else may be going on.

Once the subject is assigned to an officer, it is then their responsibility to engage with the subject and other statutory services identified to manage safeguarding or diversion.

The main aim of the engagement is as follows:

- *Identify victims of criminal exploitation* – This may be the first opportunity, outside of criminal proceedings, the subject has had to disclose that they are a victim of criminal exploitation.
- *Intelligence* – Valuable information that can be gained from talking to subjects even if a disclosure hasn't been made.
- *Building positive relationships within the community* – It is an opportunity to build relationships with subjects and their families.
- *Diversion* – Getting subjects involved in activities/work/education provides an opportunity to divert them away from being involved in criminal activity.
- *Safeguarding* – Police and other statutory partners work in partnership to put a safeguarding plan in place for the subject.
- *Disrupt criminal behaviour* – Subjects will be aware that they are of interest to police, which may deter them from involvement in further criminal activity.

Any new or increased risk identified by engagement officers should be flagged up to the CLVT manager. It will then be up to the CLVT manager to rescore and support engagement officers or if necessary reallocate the subject.

Working with the family

Parents/Guardians are a valuable contact for ongoing engagement and can help officers monitor improvement. They may be unaware of the risk county lines drug dealing presents to the young person. It also gives officers a chance to inform families about signs and symptoms of criminal exploitation.

What information can officers glean?

- Parent/Guardian contact details
- Parent/Guardian concerns
- Subject contact details
- Social media names
- School and attendance details
- Future plans/aspirations of the subject
- Subject associates or areas frequented
- Floor plans/ intelligence of home address
- Other previously unknown Intel

How often should Police engage with subjects?

The frequency of visits should be assessed on a case by case basis. This will be up to the officer dealing but the CLVT manager will monitor. There needs to be enough engagement to justify closing the subject on the CLVT.

What if a subject refuses to engage?

Subjects are not required to engage. It is important to recognise that there are many reasons why they may not want to engage with police; especially if they have had negative interactions. In some instances persistence in building a relationship can be key to turning negative engagement around. In other cases enforcement may be the only viable option. In addition to criminal proceedings, civil proceedings can be utilised by engagement officers to help safeguard the subject; for example, Criminal Behaviour Orders (CBO) or Community Protection Notices (CPN).

When do the Police stop engaging?

Engagement will usually be ongoing and would continue until the subject is 'Closed' on the CLVT. A substantial effort should be made to engage before there is justification to close the profile. As highlighted earlier in the document, there are various reasons leading to a closure.

Engagement officers should keep the CLVT manager updated regularly. If they believe that all efforts have been exhausted to safeguard and/ or divert the subject away from criminality, they can liaise with the CLVT manager. The CLVT manager will then make a decision based on whether or not the closing factors have been met.

Other Agencies

Officers can make referrals to Project Oracle or equivalent approved companies on the subject's behalf or simply assist them in finding something they are interested in and where to find out more. Officers can also offer support to subjects when dealing with other services and can encourage those services to consider working with the subject.

Engagement officers are advised to make contact with statutory partners who are working with or attempting to work with the subject and/ or their family. This could be social workers, housing associations, Youth Offending Services etc.

These partners often have access to information that police are not aware of. Engagement officers should also participate in multi-agency meetings if required to do so. The CLVT team should give support around this, as these meetings can often be short notice but it is down to the officer to highlight this to them.

Points of Reference

Duncan Evans – Child Exploitation Lead – National County Lines Coordination Centre
Email - Duncan.Evans@met.pnn.police.uk