



AN INSPECTION OF CHILD CRIMINAL EXPLOITATION IN NORTHERN IRELAND

**HOW THE CRIMINAL JUSTICE
SYSTEM RECOGNISES, ASSESSES
AND RESPONDS TO CHILD
CRIMINAL EXPLOITATION**

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February 2026

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LIST OF ABBREVIATIONS

CJI	Criminal Justice Inspection Northern Ireland
CPR	Child Protection Register
CPSOG	Child Protection Senior Officials Group
DE	Department of Education
DoH	Department of Health
DoJ	Department of Justice
EA	Education Authority
EPPOC	Executive Programme on Paramilitarism and Organised Crime
HMICFRS	His Majesty's Inspectorate of Constabulary and Fire & Rescue Services
HSCT(s)	Health and Social Care Trust(s)
IASC	Independent Anti-Slavery Commission
IRC	Independent Reporting Commission
NICCY	Northern Ireland Commissioner for Children and Young People
Niche™ Records Management System	Records Management System developed by Niche™ Technology Inc (used by the PSNI)
NICTS	Northern Ireland Courts and Tribunals Service
NRM	National Referral Mechanism
PBNI	Probation Board for Northern Ireland
PEEL	Police Effectiveness, Efficiency and Legitimacy
PfG	Programme for Government
PPS	Public Prosecution Service for Northern Ireland
PSNI	Police Service of Northern Ireland

QUB	Queen’s University Belfast
Rol	Republic of Ireland
SBNI	Safeguarding Board for Northern Ireland
UK	United Kingdom
UNCRC	United Nations Convention on the Rights of the Child
YJA	Youth Justice Agency

Note

1. Electronic links to documents and information sources referenced within this report are correct at the time of publication but may be subject to change where the information is outside CJI’s control.
2. This Inspection was assisted by the use of Microsoft Copilot, an Artificial Intelligence (AI) powered tool, guided and reviewed by CJI Inspectors, in line with UK Government AI policy and CJI’s interim AI policy.

TERMINOLOGY

Children

‘Children’ are referenced in this report to reflect the obligation to ensure the entitlement of all those up to 18 years of age to continuing protection from all forms of exploitation and abuse.¹ Its use is not intended to undermine the importance of recognising children’s evolving capacities, and the importance of facilitating choice in their engagement with criminal justice agencies.

1 *United Nations Committee on the Rights of the Child: General comment No.20 (2016) on the implementation of the rights of the child during adolescence* available at <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-20-2016-implementation-rights>.

CHIEF INSPECTOR'S FOREWORD

The abuse of a child is heinous crime, and when that abuse involves criminal exploitation and the abuser is their parent or someone they fear or believe cares for them and they can trust, the harm caused can take a lifetime to recover from. It can rob them of their childhood.

Criminally exploited children can be targeted by paramilitaries and organised crime gangs, they can be or have been living in care and have repeated episodes of going missing; and they can be involved in other types of exploitation, including sexual exploitation. Whoever exploits them, it is the child that often ends up with a criminal record that can impact on their education, employment and fulfilling their potential as well as damage to their physical and mental health.

The age of criminal responsibility in Northern Ireland is currently under consideration through draft legislation in the Northern Ireland Assembly. I know many people watch the news and see children rioting or hear about them being involved in drug crime, violent and sexual offences and they see an offender that needs to be prosecuted; sometimes it is hard to see a child whose parent or a paramilitary gang is exploiting them for their own gain. Sometimes teenagers aren't really considered as children but young adults who should know and do better. There can be a tension between an effective response to breaking the law that the public expects and safeguarding a vulnerable child.

But the voice of the child and what is happening to them beyond being a suspect requires a consistent professional response that can help identify the adults who are exploiting them and make them accountable for that abuse.

The Department of Justice in partnership with the Department of Health, Department of Education and other key stakeholders have developed a definition of child criminal exploitation and an action plan. This is welcome but this Inspection Report shows that embedding the definition into service delivery, consistent practice and action plan delivery, needs to be progressed at pace to safeguard and protect children.

Diminished resources in the Police Service of Northern Ireland is a constant high-profile issue and sometimes distracts from what is being done by Police Officers across the Service rather than what isn't. Its dedicated Officers in the Public Protection Branch do great work with some really challenging and complex children; and I am mindful of the difficult work they do every day. I was both surprised and concerned about the resources available to them in high harm, high risk areas of offending and safeguarding.

The allocation of resources is of course a matter for the Chief Constable and his senior team, but I believe it is something the Northern Ireland Policing Board should pay close attention to.

There were, understandably, parallels with the Child Sexual Exploitation Follow-Up Review, and we made sure to avoid duplication and maximise the expertise of His Majesty's Inspectorate of Constabulary and Fire & Rescue Services Associate Inspectors who supported the Inspection Team. The experiences of children included in the case file reviews were upsetting and hard to read, and some cases raised concerns that required immediate escalation, and I am grateful to the Inspection Team for their work. The powerful case studies profiled in this report illustrate the abuse some children in Northern Ireland are experiencing.

My thanks to Maureen Erne, who led this Inspection supported by Dr Roisin Devlin, Rachel Lindsay and the Inspectors who conducted the case file reviews.

Achieving a truly child-centred focus that creates safer communities in Northern Ireland and isn't believed to be a soft option for committing crimes is no easy task. At its heart it needs seamless collaboration and connection to understand and monitor outcomes for children in our community by services within organisations, each organisation and Department and across Government Departments so we know what is happening, what works and what more needs done. We all need to see children as children, protect them from harm and vigorously pursue those who are exploiting them and robbing them of their childhood. This is not a drama storyline, this is the work of all of us, there is no time to waste.



Jacqui Durkin

Chief Inspector of Criminal Justice
in Northern Ireland

February 2026



EXECUTIVE SUMMARY

Child criminal exploitation is an issue of increasing concern in Northern Ireland. It is child abuse, put simply it is where someone uses a child to engage in criminal activity or commit any type of crime. It takes many forms. Although not exhaustive, a child who has been recruited by paramilitaries, an organised crime group or their family. A child who has been coerced to become involved in public disorder, been sent into a store by a family member to steal items, or who has been stopped and found to be in possession of an illicit substance. A child in the care of the State who lives in residential care who was frequently missing from their home are all potential victims of child criminal exploitation. Ultimately, child criminal exploitation results in children being harmed with long-term consequences for their health, wellbeing and future potential.

Tackling child abuse and the exploitation of children requires more than an effective response from criminal justice agencies alone. It is a cross-Departmental matter which requires good collaborative working with other statutory agencies and community and voluntary sector organisations that puts children first, hears their voices and experiences and works to safeguard them.

However, when children do come in contact with the criminal justice system, the risks of exploitation must be recognised and steps taken to avoid the criminalisation of children. The criminal justice system must also robustly disrupt and prosecute those who abuse and exploit children.

Strategy and governance

The criminal justice system recognised that child criminal exploitation was growing in Northern Ireland, with children increasingly drawn into criminal activity through coercion, manipulation, and abuse of power. The criminal justice system faced significant challenges in recognising, assessing, and responding to child criminal exploitation, which often intersected with paramilitarism, organised crime, sexual and other forms of exploitation.

While the Department of Justice led, in partnership with the Department of Health, the development of a cross-Departmental action plan to tackle child criminal exploitation that criminal justice organisations also contributed to and participated in strategic groups; they were not working to an agreed framework to baseline their individual and collective

responses to child criminal exploitation or to effectively monitor criminal justice outcomes. The absence of a criminal justice system-wide strategy and agreed indicators of success limited their ability to assess progress, monitor the impact of criminal justice responses and inform the effectiveness of wider cross-Departmental and organisational approaches. Existing criminal justice organisation strategies and policies referenced related issues such as modern slavery, human trafficking and child sexual exploitation but mostly did not specifically address child criminal exploitation. The Youth Justice Agency was the exception and had begun to monitor individual cases of concern under its safeguarding procedures.

The Department of Justice, in collaboration with criminal justice organisations, should develop a framework to map indicators of success and implement a monitoring mechanism for criminal justice outcomes related to child criminal exploitation. This would help inform the Department of Justice and criminal justice organisational contributions to cross-Departmental oversight groups.

Delivery

The delivery of the criminal justice response to child criminal exploitation was found to be inconsistent and, in many respects, inadequate. There was no mechanism to understand the nature and scale of child criminal exploitation in Northern Ireland. Data collection was hampered by the absence of specific markers or flags for child criminal exploitation on police and prosecution systems, resulting in missed opportunities to identify and respond to exploitation

risks, provide assurance that a child-centred safeguarding response had been adopted and that perpetrators were robustly pursued.

The Police Service of Northern Ireland did not have a clear delivery model for tackling child criminal exploitation across the organisation. While senior leaders publicly acknowledged child criminal exploitation was happening, frontline Officers and staff lacked awareness and training, and there was no holistic approach to identify, investigate, or disrupt exploitation. Analytical products and problem profiles were limited, and information sharing between Police Officers and Prosecutors about risks of child criminal exploitation was not formalised.

The Police Service of Northern Ireland's response to missing children did not demonstrate an adequate understanding of the relationship between child exploitation and missing children reports. Many missing episodes were recorded as concerns for safety rather than as missing person reports and victim-blaming language was evident in some records.

There was very limited awareness across the criminal justice system about the National Referral Mechanism and its application.

Case audits revealed that children were often treated as suspects rather than victims and safeguarding referrals were not always made in a timely manner. The voice of the child was largely absent from police and prosecution records sampled, with little evidence that children's experiences, needs or circumstances were considered during investigations.

Resource pressures across the Police Service of Northern Ireland, the Public Prosecution Service for Northern Ireland and Health and Social Care Trusts further impacted the system's ability to respond effectively.

Despite these shortcomings, pockets of good practice were identified, including multi-agency support hubs and targeted interventions. Some initiatives demonstrated positive outcomes for individual children, but these were not mainstreamed or consistently applied across the system. The Police Service of Northern Ireland should immediately develop a delivery model for how child criminal exploitation is tackled across the organisation, including arrangements to monitor the effectiveness of police responses and to improve the recording, monitoring, and response to missing children.

Outcomes

There were no criminal justice system-wide outcome measures against which to baseline and monitor the effectiveness of criminal justice responses to child criminal exploitation. Data on the prevalence of exploitation among particular groups of children, locations and as children transitioned to adulthood, was not available. The lack of reliable data and outcome measures limited the ability to assess how many children had been helped, how many offenders had been disrupted or prosecuted and whether the system was improving outcomes for children at risk.

Based on the evidence gathered and considered during this Inspection, Inspectors concluded that outcomes for children who had experienced or were at risk of child criminal exploitation were not good.

The Northern Ireland Policing Plan 2025-30 introduced, for the first time, an indicator for the Police Service for Northern Ireland's effectiveness in tackling child criminal exploitation, required reporting on activities and impact to support victims. The Seventh Report of the Independent Reporting Commission noted that funded initiatives had a tangible effect in communities affected by paramilitarism, with young people reporting positive changes in their lives.

Inspectors concluded that criminal justice organisations needed to agree a framework for justice outcomes for children who had experienced or were at risk of child criminal exploitation and other forms of exploitation. This would enable responses to be assessed and monitored, inform practice and help identify gaps that could enhance the system's effectiveness. The absence of the child's voice in current responses was a significant concern and emphasised the need for child-centred approaches, improved data collection and robust monitoring to ensure that children were adequately supported and safeguarded.

RECOMMENDATIONS

STRATEGIC RECOMMENDATIONS

STRATEGIC RECOMMENDATION 1

Within six months of the publication of this report, the Department of Justice, working in collaboration with criminal justice organisations, should develop a strategic framework which baselines how the criminal justice system is tackling child criminal exploitation, sets out indicators of success and develop and implement an effective mechanism to monitor criminal justice outcomes. This framework should be used to inform and influence the Department of Justice's contributions to cross-Departmental oversight of child criminal exploitation and emerging child protection issues.

Paragraph 2.41

STRATEGIC RECOMMENDATION 2

The Police Service of Northern Ireland should immediately develop an adequately resourced delivery model for the identification, response and disruption of child criminal exploitation across the organisation and plan for the effective operationalisation of the work emerging from the cross-Departmental action plan to tackle child criminal exploitation. This should include a mechanism to monitor the effectiveness of police responses.

Paragraph 3.36

OPERATIONAL RECOMMENDATIONS

OPERATIONAL RECOMMENDATION 1

Within three months of the publication of this report, the Police Service of Northern Ireland should, in conjunction with statutory partners, include other forms of child exploitation in the Philomena Protocol form so that a fuller picture of the risk of harm to the child informs its assessment of risk and response when children are reported missing.

Paragraph 3.52

OPERATIONAL RECOMMENDATION 2

The Police Service of Northern Ireland should immediately improve its response to missing children and be able to demonstrate an improved understanding of the relationship between forms of child exploitation and missing children reports. This should include a robust process of monitoring and quality assuring reports for missing children, and effective child-centred arrangements with strategic partners to reduce the number of children who go missing.

Paragraph 3.58

Where Areas for Improvement have been identified, these are included in the body of the report.

CHAPTER 1: INTRODUCTION

WHAT IS CHILD CRIMINAL EXPLOITATION?

1.1 Child criminal exploitation is not defined in law in Northern Ireland. In September 2024 the Departments of Justice (DoJ), Health (DoH) and Education (DE) published an agreed definition of child criminal exploitation. This definition was tested with children as part of research to understand their perceptions and experiences of this in Northern Ireland.²

1.2 The Departments' full definition of child criminal exploitation is:

'Child criminal exploitation is a form of child abuse which occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity. The exploitation may be through violence or the threat of violence but may also appear to be transactional and in the context of perceived relationships and friendships. The victim may have been criminally exploited even if the activity appears to be consensual.'

'Child criminal exploitation does not always involve physical contact. It can also occur through the use of technology and social media.'

'The criminal exploitation of children and young people can include being exploited into storing drugs or weapons, drug dealing, theft, violence, intimidation, vandalism, forced labour and other forms of criminality through grooming by people that children and young people trust or look up to.'

1.3 A child friendly version of the definition was being developed.

1.4 Importantly, the above definition identified child criminal exploitation as a form of child abuse and included reference to a range of ways that children might be exploited.

2 Queen's University Belfast (QUB), *From contextual to criminal harm: Young people's perceptions and experiences of child criminal exploitation (CHILD CRIMINAL EXPLOITATION in Northern Ireland)*, Walsh, C. (2023) available at <https://www.endingtheharm.com/research-papers/from-contextual-to-criminal-harm/>.

- 1.5 There were different definitions of child criminal exploitation and child sexual exploitation in use across England and Wales. Research commissioned jointly by the Modern Slavery Policy Evidence Centre and the United Kingdom (UK) Independent Anti-Slavery Commissioner (IASC) was exploring this and considering the impact of the different definitions on people's cases and outcomes arising from them. It is the IASC's position that the definitions in use were inaccurate and unclear.³ Her 2024 Child Trafficking Report⁴ recommended that the UK Government should introduce statutory definitions of child criminal and sexual exploitation which were compliant with international law and that any definitions should make clear that a child cannot consent to their own exploitation. The IASC went on to say that *'a broad definition of child exploitation would ensure that children are treated as children first and that the interrelatedness of different forms of exploitation are captured.'* This call for a statutory definition was also made in The Jay Review of Criminally Exploited Children⁵ ('the Jay Review') which stated that the absence of a clear and consistent definition of the criminal exploitation of children contributed to a failure to protect and support them. This was exacerbated in England and Wales by the different definitions in use. Forthcoming legislation in England and Wales would introduce a statutory definition of child criminal exploitation (see Chapter 2).
- 1.6 It was positive that a definition had been agreed for Northern Ireland but it was yet to be widely adopted and awareness and understanding of it was low across the inspected organisations. While there had been an official launch of the definition, a decision had been made not to include it in organisational policies and strategies pending an update to Northern Ireland child safeguarding procedures. It was important to check and continually review how the definition adopted met international law requirements and the introduction of a statutory definition in England and Wales.

BACKGROUND TO THIS INSPECTION

- 1.7 The criminal exploitation of children is not new, however, concern about its nature and scale in Northern Ireland had been growing in recent years. Public disorder in Northern Ireland during 2024, reportedly involving children as young as six and seven-years-old, drew widespread attention to the issue of child criminal exploitation in Northern Ireland. Police Service of Northern Ireland (PSNI) senior leaders have been clear that children were being criminally exploited and that they were aware of individuals associated with paramilitarism potentially being involved.⁶

3 IASC, *Policy brief, Child exploitation: prevention, protection and support for children and young people* available at https://www.antislaverycommissioner.co.uk/media/u5adrje/24-08-07-child-exploitation-brief_final.pdf

4 IASC, *Child Trafficking in the UK 2024: a snapshot* available at <https://www.antislaverycommissioner.co.uk/media/bp0flhtg/child-trafficking-report-2024.pdf>

5 Action for Children, *Shattered lives, stolen futures, the Jay Review of Criminally Exploited Children, March 2024* available at https://media.actionforchildren.org.uk/documents/Shattered_Lives_Stolen_Futures_Report_-_Full_Report.pdf

6 BBC, *Children 'as young as six involved in disorder'*, 10 July 2024 available at <https://www.bbc.co.uk/news/articles/c2x015jrr5xo> and Belfast Telegraph, *PSNI Chief Constable: 'Disorder on streets should be watershed moment in tackling racism'*, 5 September 2024 available at <https://www.belfasttelegraph.co.uk/news/northern-ireland/psni-chief-constable-disorder-on-streets-should-be-watershed-moment-in-tackling-racism/a1363302539.html>

Although 2024 is used as the reference point for this Inspection, children have been drawn into public disorder before this timeframe and subsequent to it.

- 1.8 Acknowledgement of this was included in the Fresh Start Agreement and Implementation Plan 2016 ('Fresh Start') that committed Northern Ireland's elected representatives to work together to end paramilitarism and tackle organised crime. Fresh Start included a commitment to a cross-Departmental programme to prevent vulnerable young people being drawn into paramilitary activity – the Northern Ireland Executive (the Executive) Programme on Paramilitarism and Organised Crime (EPPOC). A Panel established to make recommendations for a strategy to disband paramilitary groups recognised the influence that paramilitary groups exercised over young people and made three specific recommendations to inform the cross-Departmental programme related to promoting lawfulness (Recommendation A4), support for transition (Recommendation B13) and education, employment and young people (Recommendation D1).⁷
- 1.9 An international body, the Independent Reporting Commission (IRC) was established by the UK and Irish Governments to report annually on the progress made to ending continuing paramilitary activity, report on implementation of the work of the two Governments and the Executive and consult with the administration, law enforcement agencies, other agencies and civic bodies.
- 1.10 The EPPOC programme funded a wide range of schemes, research and awareness campaigns to help prevent at risk children from becoming involved in paramilitary activity. The cross-Departmental work was building on this foundational programme approach to create a systemic child safeguarding response to child criminal exploitation. Further reference to the work of EPPOC is set out later in this report.

DEVELOPING A NORTHERN IRELAND RESPONSE TO CHILD CRIMINAL EXPLOITATION

- 1.11 Until late 2024 a Child Protection Senior Officials Group (CPSOG)⁸ provided strategic direction on existing and emerging child protection issues in Northern Ireland. In April 2021 the CPSOG added child criminal exploitation as a priority area to its work plan. As a result of young children being involved in public order disturbances in July 2021, the then Northern Ireland Commissioner for Children and Young People (NICCY) produced an advice paper, which called for a *'unified strategic approach to protect children from harm including abuse, violence, coercion and exploitation by organised gangs and groups.'*

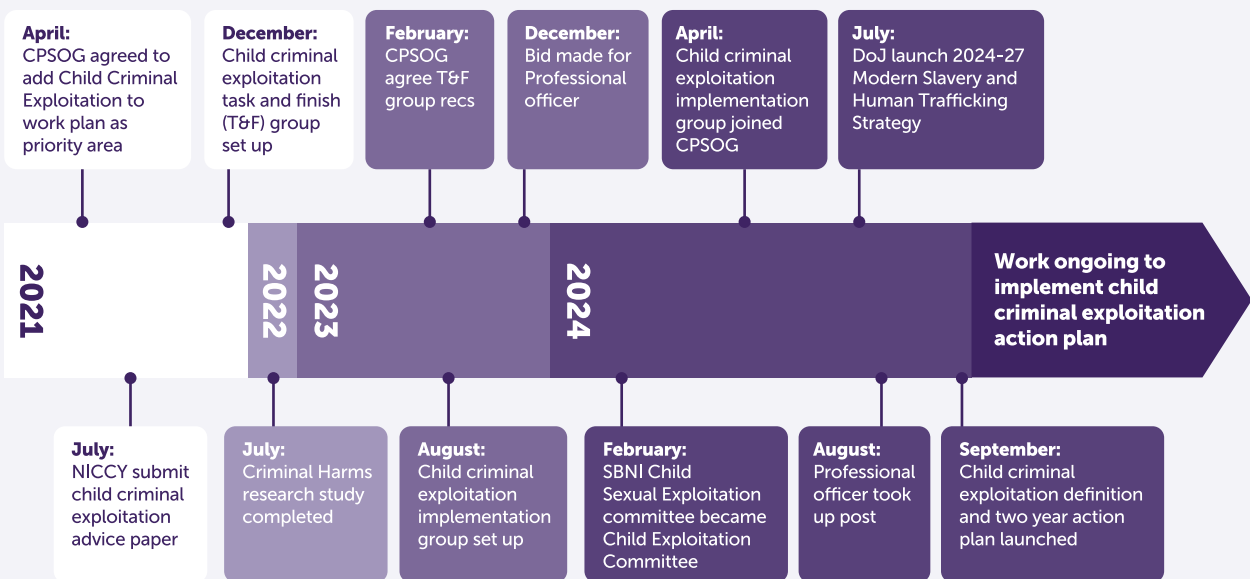
⁷ Lord Alderdice, John McBurney, Professor Monica McWilliams, *The Fresh Start Panel report on the Disbandment of Paramilitary Groups in Northern Ireland, May 2016* available at https://cain.ulster.ac.uk/events/peace/stormont-agreement/2016-06-07_Fresh-Start-Panel_paramilitary-groups.pdf

⁸ CPSOG was established in 2018 and was chaired by the Deputy Secretary for Social Services Policy/Chief Social Work Officer within the DoH. It was attended by other senior officials from the DoH, the DoJ, DE, Department of Finance and Department for Communities.

This paper was considered by the CPSOG and a Task and Finish Group⁹ was established to make recommendations to address child criminal exploitation in Northern Ireland. The CPSOG commissioned the Education Authority (EA) Youth Service and Queen's University Belfast (QUB) to capture the voices and views of young people and their perceptions and experience of child criminal exploitation in Northern Ireland. The research study was completed in July 2022.

- 1.12 In February 2023 the CPSOG agreed all the Task and Finish Group recommendations; and in August 2023 a Child Criminal Exploitation Implementation Steering Group was set up to progress the recommendations. A bid for additional resources to support recommendation implementation was submitted to the EPPOC sponsor group in December 2023, but due to recruitment issues, a Professional Officer to lead on child criminal exploitation implementation within the Safeguarding Board for Northern Ireland (SBNI) was not appointed until August 2024.
- 1.13 In April 2024, due to duplication of work and membership among a number of groups, the Child Criminal Exploitation Implementation Steering Group was stood down and members were invited to join the CPSOG Subgroup.
- 1.14 On 30 September 2024 the cross-Departmental child criminal exploitation action plan ('cross-Departmental action plan') and definition were launched by the Ministers of Justice, Health and Education. Figure 1 summarises the timeline for the development of the response to child criminal exploitation. A summary of the key elements of the cross-Departmental action plan is set out in Table 2 in Chapter 2.

Figure 1: Summary of the key steps in the development of a response to child criminal exploitation in Northern Ireland.



⁹ The Task and Finish Group was jointly led by the DoH and DoJ and included a wide range of representatives from government departments, academia, local government, and other relevant bodies including the EPPOC, the PSNI, the Safeguarding Board for Northern Ireland (SBNI), the EA, the Youth Justice Agency (YJA) and the Northern Ireland Housing Executive (NIHE).

PREVIOUS INSPECTION REPORTS

- 1.15 This is Criminal Justice Inspection for Northern Ireland's (CJI's) first inspection of how the criminal justice system responds to child criminal exploitation. CJI had previously conducted inspections of related areas including of Child Sexual Exploitation (June 2020)¹⁰, Modern Slavery and Human Trafficking (October 2020)¹¹ and a pilot joint inspection of child protection arrangements in the Southern Health and Social Care Trust area (HSCT) (June 2023).¹² CJI had also contributed to the Independent Inquiry of Child Sexual Exploitation in Northern Ireland (November 2014)¹³ led by Kathleen Marshall.
- 1.16 In June 2020, CJI published a report¹⁴ of the criminal justice system's response to child sexual exploitation which made two Strategic and seven Operational Recommendations for improvement. These recommendations included a strategic framework to address child sexual exploitation which included the development of a mechanism for independent joint child protection inspection, the development of a comprehensive profile of child sexual exploitation in Northern Ireland and work related to policy and procedures, operational delivery of services, training and quality assurance. CJI conducted a Follow-Up Review of progress during 2025 and found that of the two Strategic Recommendations and seven Operational Recommendations, Inspectors rated one as achieved, six partially achieved and two not achieved¹⁵. While recognising the work of individuals across the criminal justice system to bring perpetrators to justice and ensure the protection of children as well as noting some positive developments, the findings demonstrated a challenge for organisations in achieving long-term improved outcomes for children at risk of child sexual exploitation.
- 1.17 The pilot joint inspection of child protection arrangements in the Southern HSCT¹⁶ originated from Strategic Recommendation 1 of CJI's Child Sexual Exploitation Inspection which noted that the UK Government and the Scottish Government had supported joint inspection frameworks of child protection. This included appraising how children, including those who had been victims of, or at risk of, child sexual exploitation had been protected. The pilot joint inspection was conducted by

10 CJI, *Child Sexual Exploitation in Northern Ireland: An Inspection of the criminal justice system's response, June 2020* available at <https://www.cjini.org/wp-content/uploads/2025/05/CSE-Report-May20-Full-Report-TAGGED.pdf>

11 CJI, *Modern Slavery and Human Trafficking: An Inspection of how the criminal justice system deals with Modern Slavery and Human Trafficking in Northern Ireland, October 2020* available at <https://www.cjini.org/report-category/modern-slavery-and-human-trafficking/>

12 CJI, *A Pilot Joint Inspection of Child Protection Arrangements in the Southern Health and Social Care Trust Area, June 2023* available at <https://www.cjini.org/reports/first-joint-inspection-of-child-protection-arrangements/>

13 Marshall, K, *Child Sexual Exploitation in Northern Ireland, Report of the Independent Inquiry, November 2024* available at https://www.cjini.org/wp-content/uploads/2025/05/CSE-Inquiry-Report-Final_for_Publication.pdf

14 CJI, *Child Sexual Exploitation in Northern Ireland: An Inspection of the criminal justice system's response, June 2020* available at <https://www.cjini.org/wp-content/uploads/2025/05/CSE-Report-May20-Full-Report-TAGGED.pdf>

15 CJI, *Child Sexual Exploitation in Northern Ireland Follow-Up Review: An assessment of the criminal justice system's response, December 2025* available at [Child Sexual Exploitation Follow-Up Review: An assessment of the criminal justice system's response - CJI NI](#)

16 CJI, *A Pilot Joint Inspection of Child Protection Arrangements in the Southern Health and Social Care Trust Area, June 2023* available at <https://www.cjini.org/reports/first-joint-inspection-of-child-protection-arrangements/>

CJI, the Regulation and Quality Improvement Authority and the Education and Training Inspectorate. The joint pilot inspection found that going forward, a greater understanding of the effectiveness of multi-agency working to improve outcomes for children was required and that it was important for all agencies to robustly and transparently self-evaluate the effectiveness of their responses to children referred to Gateway Services operated by Social Services and to the PSNI's Central Referral Unit. A joint action plan to address the Inspection's findings was developed by the PSNI, the EA and the Southern HSCT.

FINDINGS FROM OTHER INSPECTORATES AND INQUIRIES

- 1.18 His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) had conducted a range of inspections examining police forces' responses to child criminal exploitation both as part of assessments of the effectiveness, efficiency and legitimacy of police services (PEEL) and inspections of child abuse and child protection issues. These included national child protection inspections in England and Wales, joint targeted area inspections in England, joint inspections of child protection arrangements in Wales and thematic reviews of key issues including responses to child sexual and criminal exploitation.
- 1.19 The PSNI was inspected by HMICFRS following a request to the DoJ from the Northern Ireland Policing Board. An October 2023¹⁷ report identified that the service should improve its understanding of and response to child criminal exploitation. HMICFRS reported that there was a perception by the PSNI that child criminal exploitation was not a significant issue in Northern Ireland and a misconception that child criminal exploitation related to county lines¹⁸ type exploitation which occurred in England and Wales. However, HMICFRS Inspectors cited examples of children being exploited by criminal gangs in Northern Ireland.
- 1.20 While the PSNI had not been included in HMICFRS inspections of child abuse and exploitation, it was helpful to consider the findings from recent inspections. From 2023 to July 2025, HMICFRS published six national child protection inspections of six different police forces. A recurring theme across most of the six forces inspected was the need to improve responses to missing children including how police responded to and recorded reports of missing children. Greater Manchester Police was found to make good use of specialist products often applied during serious and organised crime investigations to help locate missing children assessed as high risk. Specialist investigations teams investigated child criminal and sexual exploitation but in three of the six forces, improvements were needed to ensure that these teams were adequately resourced.

17 HMICFRS, *The Police Service of Northern Ireland: an Inspection of Police Effectiveness, efficiency, vetting and standards* available at <https://hmicfrs.justiceinspectorates.gov.uk/publications/psni-inspection-of-police-effectiveness-efficiency-vetting-and-standards/>.

18 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'.

- 1.21 In 2023 HMICFRS was commissioned by the Mayor of London to examine the Metropolitan Police Service's (Metropolitan Police) response to child criminal and sexual exploitation. The inspection found that the Metropolitan Police response was not effective with the force not doing enough when children were suffering from, or were at risk, of exploitation. The Metropolitan Police's lack of understanding of the nature and scale of exploitation was identified as a significant barrier to the service being able to tackle child exploitation effectively. The following serious concerns were identified during the inspection:
- use of victim blaming language;
 - a failure to identify and understand the links between missing children and exploitation and a poor response by the police when children were reported missing;
 - officers not having the right skills and knowledge; and
 - delays starting investigations which meant that the service may have missed opportunities to identify suspects and take disruptive action against perpetrators.
- 1.22 A follow-up visit during 2025 found that while there was work still to do, the Metropolitan Police had a renewed focus on child exploitation and links to missing children and was providing better outcomes for children. The investigation of child criminal exploitation had improved, and it was better at recognising exploitation.
- 1.23 A similar inspection of Greater Manchester Police and its safeguarding partners' approach to investigation of allegations of child sexual and criminal exploitation reported in July 2025. HMICFRS Inspectors found that Greater Manchester Police had improved how it investigated child sexual exploitation but that it needed to address gaps in training. Threats of harm to children caused by child sexual and criminal exploitation were increasingly being recognised by Greater Manchester Police and its partners.
- 1.24 In February 2024, following a 22-month inquiry, the Northern Ireland Affairs Committee published its report of the effect of paramilitary and organised crime on society in Northern Ireland. One of the recommendations related to the exploitation of children. This called for an assessment of how the PSNI and other crime agencies used powers contained in the *Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015* ('the Act') for inclusion within an audit of the extent to which the Northern Ireland framework for safeguarding children and young people, protected those abused by paramilitary and organised gangs. The UK Government's response acknowledged the importance of this and noted this was a policy area that had been devolved to the Executive. The same response highlighted that the cross-Departmental Action Plan included, in line with a then draft Modern Slavery and Human Trafficking Strategy, provision to increase awareness of offences in the Act as they related to children. An updated DoJ Modern Slavery and Human Trafficking Strategy 2024-27 was published in July 2024 and included objectives to increase public awareness of modern slavery and human trafficking in Northern Ireland.

1.25 A December 2024 Northern Ireland Policing Board *Human Rights Review of Children and Young People and Policing*¹⁹ ('the Review') included an examination of the PSNI's response to child criminal exploitation. The Review highlighted the key role the PSNI had in tackling child criminal exploitation working alongside statutory partners and voluntary organisations to make a positive change. The Review identified that the PSNI would benefit from the introduction of a statutory definition of child criminal exploitation to enable effective policy and guidance to inform and help their response to children who were most vulnerable from this form of exploitation. Better messaging and engagement with communities was also raised. The Review made two recommendations to improve performance. Recommendation 9 was that the PSNI should report on how it intends to achieve their objectives in supporting children at risk of offending or becoming victims of crime when neighbourhood police and other officer numbers were falling and that the PSNI should report twice a year on the outcomes of referrals to the NRM [National Referral Mechanism] (Recommendation 16).

LEARNING FROM RESPONSES IN OTHER JURISDICTIONS

1.26 The Jay Review of Criminally Exploited Children ('the Jay Review') was published by Action for Children in March 2024.²⁰ The Review had been commissioned to understand what was working well across the UK to protect children from exploitation and what more needed to be done. The context for the Review was the emergence of child criminal exploitation as a priority concern for child protection, the police, schools and local support agencies. The Jay Review referenced that the operating model of exploitation was perhaps even more complex in Northern Ireland 'where the continuing community trauma from the Troubles means that '[u]nlike organised crime networks in other areas, the potential reach of paramilitary and organised crime structures in Northern Ireland is wider, with influence extending into cultural and social life', presenting a 'clear and present danger' to young children.'

1.27 The Jay Review Report recommended that the four nations of the UK worked together to create a new approach designed with the explicit purpose of tackling child criminal exploitation built on three pillars:

- **A single, cohesive legal code designed to tackle the criminal exploitation of children.** The criminal exploitation of children should be given a statutory definition within UK law with consultation held with young people and families to develop corresponding guidance. Specific legislation should be drawn up for England, Wales, Scotland and Northern Ireland covering child abuse through exploitation and create a new criminal offence. New powers should be given to the police and criminal justice system to identify and sanction exploiters.

19 Northern Ireland Policing Board, *Human Rights Review of Children and Young People and Policing*, December 2024 available at <https://www.nipolicingboard.org.uk/files/nipolicingboard/2024-12/Final%20Human%20Rights%20Review%20of%20Children%20and%20Young%20People%20and%20Policing.pdf>

20 Action for Children, *Shattered lives, stolen futures, the Jay Review of Criminally Exploited Children*, March 2024 available at https://media.actionforchildren.org.uk/documents/Shattered_Lives_Stolen_Futures_Report_-_Full_Report.pdf

- **Co-ordinated policy and practice at a local and national level.** The UK Government should take the lead in developing a national strategy for preventing the criminal exploitation of children. Exploitation must be recognised as a distinct category of child protection in all four nations with a new pathway for protecting children from risk outside the home and local safeguarding arrangements must be robust and well-funded. A welfare-first approach should be taken in the management of offences committed by exploited young people.
- **Investment, research and whole-system learning.** Investment and funding for early intervention and prevention services for exploited young people must be specific, increased and ring-fenced. Data and information collection must be standardised to allow for identification of young people at risk and disruption of perpetrators, with a new cross-border protocol for sharing data between the four nations.

1.28 Inspectors could not find a UK Government response to this important Review Report and its findings.

1.29 In May 2023 a Scoping Review²¹ commissioned by the Children and Young People's Centre for Justice, Action for Scotland and the Scottish Government was published. The Scoping Review sought to establish a baseline understanding of the nature, scale and extent of child criminal exploitation in Scotland. The Scoping Review concluded that children were being criminally exploited across Scotland but that improvements to data recording practices, awareness raising among professionals and current legislation could help further knowledge and understanding of the true scale and nature of child criminal exploitation in Scotland.

1.30 In the Republic of Ireland (RoI) a partnership between the Department of Justice and University of Limerick was established in 2016 to develop an evidence-based programme to tackle child criminal exploitation known as the Greentown Project. The Project was multi-faceted and used police crime data to map networks and relationships between adults and children, as well as crime models. Children who had been coercively controlled by adults and their families were offered tailored and targeted support by youth and family services. The Project Team identified who the most vulnerable children at risk from crime gangs were. The work specifically focused on disrupting organised crime groups and improving outcomes for at risk children.

21 Dixon, N, *Understanding Child Criminal Exploitation in Scotland: A Scoping Review*, 25 May 2023 available at <https://www.cycj.org.uk/resource/understanding-child-criminal-exploitation-in-scotland-a-scoping-report/#:~:text=Commissioned%20by%20CYCJ%2C%20Action%20for%20Scotland%20and%20the,extent%20of%20Child%20Criminal%20Exploitation%20%28CHILD%20CRIMINAL%20EXPLOITATION%29%20in%20Scotland>

- 1.31 The first Greentown Report showed that criminal networks in many areas coercively controlled young children. As well as analysing how criminal networks recruited and controlled often vulnerable children, the Greentown Project attempted to identify the scale of the problem in the RoI and the resulting National Prevalence Report (2017) established that this issue was widespread across the country, in both rural and urban settings. It was estimated that up to 1,000 children were engaged in or at risk of engagement with a criminal network.²² The Greentown Project was subsequently extended to two further An Garda Síochána sub-districts, Bluetown and Redtown and a new community intervention programme was being rolled out in two further areas.
- 1.32 Informed by the Greentown Project and other reports and calls for reform, during 2024 the RoI's Minister for Justice commenced the Criminal Justice (Engagement of Children in Criminal Activity) Act 2024 (*the Act*), which made it an offence for an adult to either force or encourage children to engage in any criminal activity. Those found guilty of the new offences could face imprisonment of up to 12 months on summary conviction and up to five years on indictment. The intention of the Act was to criminalise adults who groom children to commit crimes.
- 1.33 The Act recognised the life-long impact and harm done to a child by drawing them into criminal activity and was one of a set of holistic measures being progressed under the RoI's Youth Justice Strategy 2021-2027 (*the Strategy*) to address youth offending.
- 1.34 Under the Strategy, a wider intensive intervention pilot called the Greentown Programme was established. This specifically focused on disrupting organised crime groups who lured children into crime and improving outcomes for children at risk or already engaged in criminal networks. Under the Strategy, the Greentown Project was extended for a further three years (2024-2027) so that the learning for best practice could be formalised and disseminated to the entire network of youth justice initiatives.

SCOPE OF THIS INSPECTION

- 1.35 While recognising the cross-cutting nature of child criminal exploitation and the need to tackle it on a cross-Departmental basis, the focus of this Inspection was on how effectively the criminal justice system recognised, assessed and responded to it.

²² Department of Justice, Home Affairs and Migration, Greentown Research Project, 2021 available at <https://www.gov.ie/en/department-of-justice-home-affairs-and-migration/publications/greentown-research-project/>

- 1.36 There was a particular focus on the role of the PSNI given the pivotal part it had in determining a child’s pathway through the criminal justice system and in the identification and investigation of suspects, and PPS’s role in making decisions about how cases would proceed. The role of the Northern Ireland Courts and Tribunals Service (NICTS), the Probation Board for Northern Ireland (PBNI) and the Youth Justice Agency (YJA) was also examined from the perspective of how child criminal exploitation was emerging in their work. The role of the DoJ as the policy lead was also examined.
- 1.37 The Inspection Report makes observations on the interfaces between the DoJ, criminal justice organisations and other Departments and bodies that CJI has no statutory remit to inspect.
- 1.38 The PSNI response to missing children was examined including their relationships with HSCTs given the risks associated with children reported missing and child exploitation.
- 1.39 While the focus of this inspection was child criminal exploitation, most inspections of child protection matters in England and Wales looked at risks to children more holistically and routinely addressed responses to child criminal and sexual exploitation, missing children and other forms of exploitation. CJI has focused this inspection on child criminal exploitation, however, it was recognised that some children may be subject to multiple forms of abuse at the one time. It is further noted that there has been a move to talk about child exploitation more broadly and this term is also used where appropriate within this Report when talking about child exploitation in a broader sense.
- 1.40 As a CJI Child Sexual Exploitation Follow-Up Review was ongoing at the time of writing, this Inspection Report does not focus on child sexual exploitation to avoid duplication. However, many of the 2020 inspection findings and the observations contained in the Follow-Up Review are relevant to this Inspection.

THIS INSPECTION

- 1.41 The Terms of Reference for this Inspection were published in February 2025 (Appendix 1) and fieldwork was mostly conducted from March to June 2025. Full details of the methodology for the Inspection can be found at Appendix 2.
- 1.42 Prior to the commencement of fieldwork, the DoJ and relevant criminal justice agencies completed a self-assessment and provided supporting documentation and data.

- 1.43 Meetings with a range of stakeholder organisations and individuals informed the focus of the inspection and importantly reflected the experiences and voices of children experiencing or at risk of child criminal exploitation. Fieldwork with the criminal justice agencies comprised interviews, focus groups and case audits of PSNI and Public Prosecution Service for Northern Ireland (PPS) records. Inspectors from HMICFRS assisted CJI Inspectors to examine PSNI case files. An overview of the sampled cases files is also set out in Appendix 2.
- 1.44 Fieldwork for this Inspection and the Child Sexual Exploitation Follow-Up Review was combined and conducted at the same time to reduce the operational impact on organisations contributing to stakeholder discussions, interviews and focus groups.
- 1.45 Several anonymised case reviews are included within the body of the Inspection Report to reflect the experiences of children and illustrate key findings. The names of the children in these cases and other identifying information have been omitted to protect the identity of the children involved.
- 1.46 This Report is structured in line with CJI’s Inspection Framework with separate Chapters reporting on Strategy and Governance, Delivery and Outcomes. Within each, Departmental and criminal justice system responses are set out followed by individual criminal justice agency commentary where appropriate.

CHAPTER 2: STRATEGY AND GOVERNANCE

- 2.1 This Chapter examines the legal framework for child criminal exploitation, Executive, Departmental and criminal justice organisation strategies concerning their work with children and the governance framework to support delivery and sets out how the cross-Departmental response to child criminal exploitation has evolved in Northern Ireland.

LEGAL FRAMEWORK

- 2.2 The *United Nations Convention on the Rights of the Child* (UNCRC) was the overarching framework to guide the development of local laws, policy and services to children. Article 19 of the UNCRC stated that all children and young people must be protected from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parents, legal guardians or any other person who has care of the child. Article 34 of the UNCRC required Governments to protect children from all forms of sexual exploitation and sexual abuse and all other forms of exploitation prejudicial to any aspects of a child's welfare (Article 36).
- 2.3 In its 2023 Concluding Observations,²³ the UNCRC urged Governments to take steps to strengthen child protection systems and promptly and effectively investigate and intervene in all cases of violence against children including the abuse of children in and outside the home. Strengthened measures aimed at tackling violence against children, by implementing the recommendations of the Gillen Review in Northern Ireland and other relevant inquiries and investigations conducted by independent bodies were also highlighted. Specifically in relation to protecting children from all forms of violence, the Committee recommended, *'the strengthening of measures to protect children from intimidation, racist attacks and other forms of violence committed by non-state actors, including by so called paramilitary organisations in Northern Ireland, and from recruitment by such actors into violent activities.'*
- 2.4 *The Children (Northern Ireland) Order 1995* ('the Order') was the framework for childcare law in Northern Ireland and set out the main statutory duties for the protection and welfare of children including requirements for child protection investigations. *Co-operating to Safeguard Children and Young People in Northern*

23 UNCRC, *Concluding Observations on the combined sixth and seventh periodic reports of the United Kingdom of Great Britain and Northern Ireland, June 2023, CRC/C/GBR/CO/6-7, June 2023* available at <https://www.ohchr.org/en/documents/concluding-observations/crcgbrco6-7-concluding-observations-combined-sixth-and-seventh>.

*Ireland*²⁴ was the overarching policy framework for child protection and set out the safeguarding responsibilities of a range of organisations including criminal justice organisations. It had been revised in August 2017 to include exploitation as a specific type of abuse and set out guidance related to safeguarding children in specific circumstances including the sexual exploitation of children; the protection of looked after children (that is children who are in the care of the State); missing children and separated, unaccompanied and trafficked children.

- 2.5 Exploitation was defined in the *Northern Ireland Regional Core Child Protection Policy and Procedures* as 'the intentional ill-treatment, manipulation or abuse of power and control over a child or young person; to take selfish or unfair advantage of a child or young person or situation, for personal gain. It may manifest itself in many forms such as child labour, slavery, servitude, engagement in criminal activity, begging, benefit or other financial fraud or child trafficking. It extends to the recruitment, transportation, transfer, harbouring or receipt of children for the purpose of exploitation. Exploitation can be sexual in nature.' Exploitation, however, was not included in the categories of registration for the Child Protection Register (CPR) although abuse resulting from or caused by the exploitation of children and young people could be categorised within the existing CPR categories that is physical abuse, neglect, emotional abuse, sexual abuse or a combination of these forms of abuse. Despite this recognition of exploitation under Co-operating to Safeguard, the framework did not yet include specific guidance related to child criminal exploitation.
- 2.6 The SBNI was responsible for developing regional child protection policy and procedures. The SBNI membership comprised a range of organisations including representation from the five HSCTs, the EA, the PSNI, the PBNI and the YJA. The primary objective of the SBNI was to safeguard and promote the welfare of children and young people by co-ordinating the efforts of various organisations from the statutory, community and voluntary sectors and ensuring they deliver effective safeguarding practices.
- 2.7 The *Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland)* ('the Act') 2015 provided a statutory framework for the prosecution of traffickers and those subjecting people in Northern Ireland to slavery; the provision of improved support for victims and tackling the demand for the services of trafficked victims. Specifically for children, the Act provided for an Independent Guardian to be appointed for a child who was a victim or potential victim of human trafficking or who was a separated child (Section 21). Section 22 created a statutory defence for victims of human trafficking and modern slavery and that children would be able to use the defence when an offence took place as a direct consequence of them being a victim of a slavery-like offence or of 'relevant exploitation.'²⁵

24 DoH, *Co-operating to Safeguard Children and Young People in Northern Ireland*, October 2024 available at <https://www.health-ni.gov.uk/sites/default/files/publications/health/Co-operating-to-Safeguard-Children-and-Young-People.pdf>.

25 See Section 3, subsections (1) to (5) of the *Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015* which defined the meaning of exploitation and included slavery, servitude and force of compulsory labour, sexual exploitation, removal of organs and secure services by force, threats or deception.

- 2.8 Unlike England and Wales where criminal exploitation has been recognised within the framework of modern slavery and human trafficking, this was not the case in Northern Ireland as evidenced by the comparatively low levels of referrals of children as potential victims of modern slavery to the National Referral Mechanism (NRM). This was a framework for identifying potential victims of modern slavery and ensuring they received appropriate support. Efforts to maximise awareness of the NRM and use of modern slavery and human trafficking offences had been included in the DoJ's 2024-27 Modern Slavery and Human Trafficking Strategy.
- 2.9 A 2025 research report,²⁶ commissioned by the DoJ and conducted by Ulster University and the International Organisation for Migration, found that the unique context of Northern Ireland posed discrete challenges to the identification of modern slavery and human trafficking in the context of child criminal exploitation. These challenges related to:
- a) the often normalised hyperlocal nature of harm due to the legacy of the past and both intergenerational and familial links to paramilitary and organised crime groups;
 - b) safety concerns about making NRM referrals for child criminal exploitation related to potential child victims as well as for those referring children to the NRM; and
 - c) Northern Ireland's unique devolution arrangements relating to the continuity of government and requirement for cross-party agreement on cross-cutting issues.
- 2.10 Potential barriers to identification of child criminal exploitation as human trafficking included the absence of the commencement of the 'Duty to Notify' provision in the Northern Ireland legislation. This provision required public authorities to inform the Home Office if they suspected an individual was a potential victim of modern slavery. A further barrier was a focus on movement within Northern Ireland's definitions of human trafficking which was not in keeping with internationally accepted definitions. The report authors stated that '*a focus on movement within law and NRM guidance may be both a cause and consequence of how human trafficking is conceptualised and understood within and beyond Northern Ireland.*' Inspectors supported this finding and the recommendation made to the Executive to consider amending the legislation.
- 2.11 The Crime and Policing Bill 2025, announced in February 2025, included proposals by the UK Government to create two new offences to tackle child criminal exploitation: a specific offence of child criminal exploitation carrying a maximum sentence of 10 years and a Cuckooing offence with a maximum penalty of five years imprisonment. The Bill would also introduce Child Criminal Exploitation Prevention Orders. Breaching a Child Criminal Exploitation Prevention Order would

26 *Modern Slavery and Human Rights Policy Evidence Centre and DoJ, Identifying modern slavery and human trafficking in the context of child criminal exploitation in Northern Ireland, June 2025* available at https://files.modernslaverypec.org/production/assets/downloads/NI_Research_Summary.pdf?dm=1750670788.

be a criminal offence carrying a maximum five-year prison sentence. The Bill was at Committee stage (November 2025) in the House of Lords and a definition of child criminal exploitation was to be included in statutory guidance. It was proposed that an adapted form of proposed provisions for England and Wales would be extended to Northern Ireland and a definition of child criminal exploitation would be included in statutory guidance. The policy intention in Northern Ireland was that the new offences would help drive prosecutions for child criminal exploitation. Although offences were available under existing modern slavery and human trafficking legislation, use of these provisions both in Northern Ireland and England and Wales was low. A number of organisations commented that the need for a standalone offence had not been made given provision in existing legislation but also that safeguards under modern slavery legislation such as the statutory defence and support for victims through the NRM may not be replicated in the new legislation.

- 2.12 The creation of a specific offence in Northern Ireland had not initially been included in the cross-Departmental action plan whereas provision for new offences of 'directing' and 'participating in' organised crime had. The latter had been drafted for inclusion in the Northern Ireland Justice Bill, introduced to the Northern Ireland Assembly by the Minister of Justice in 2024 and was now at Committee stage. There was very little knowledge of any of the proposed new offences among criminal justice staff we spoke to during this inspection. Questions were raised about how the new offences were to be operationalised and of their relationship with existing human trafficking offences which could already be being used. Inspectors considered that it would be important for victim support pathways and that statutory defences were replicated under any new legislation.

STRATEGY

- 2.13 The Executive's Programme for Government (PfG) 2024-27²⁷ outlined key priorities aimed at improving the lives of people in Northern Ireland. Safer communities was identified as one of nine immediate priority areas. Other priority areas set out how the Executive would better meet the needs of children and young people and tackle violence against women and girls. Within the PfG, child criminal and child sexual exploitation were recognised as different types of harm experienced by people and communities in Northern Ireland. Under the Safer Communities immediate priority area, the Executive committed to securing Executive agreement for an extension of the EPPOC until 2027. The PfG stated that the Government remained committed to tackling paramilitarism and organised crime and that it would continue to support cross-Executive efforts to address them, building on previous work which sought to address the root cause of violence, and which demonstrated the links between vulnerability and paramilitary harm.

27 Northern Ireland Executive, *Our Plan: Doing What Matters Most, Programme for Government 2024-2027*, March 2025 available at https://www.northernireland.gov.uk/sites/default/files/2025-03/programme-for-government-2024-2027-our-plan-doing-what-matters-most_2.pdf.

- 2.14 The Children’s Services Co-operation Act (Northern Ireland) 2015 required the Executive to adopt a Children and Young People’s Strategy (‘Strategy’) to set out how it proposed to improve the wellbeing of children and young people in Northern Ireland. The *Children and Young People Strategy 2020-30* was subsequently published in January 2021 and listed the outcomes the Executive aimed to achieve.
- 2.15 While the Strategy does not specifically refer to child criminal exploitation, one of the eight high level outcomes was that ‘*Children and Young People live in safety and stability.*’ Of relevance, was work focused on the following groups of children: those who had been identified as under the threat of paramilitary intimidation or recruitment; looked after and care experienced children, those who were victims of or at risk of sexual exploitation as well as children in contact with the youth justice system. Table 1 summarises the Strategy commitments to these groups of children.

Table 1: Strategy outcomes: Children and young people live in safety and stability

<p>Children and young people under the threat of paramilitary intimidation or recruitment.</p>	<p><i>We will continue to work together to prevent vulnerable young people from being drawn into organised crime and paramilitary activities.</i></p> <p><i>We will also support the initiatives within the Tackling Paramilitarism Programme [EPPOC] which focus on children and young people.</i></p> <p><i>We will seek to promote a shared future and shared spaces and raise the aspirations of young people to avoid criminal activity.</i></p>
<p>Children and young people who are victims or at risk of sexual exploitation.</p>	<p><i>We will continue to progress the work undertaken in response to the recommendations of the Marshall Inquiry and will determine what additional action is required to protect children and young people who have been sexually exploited or may be at risk of sexual exploitation.</i></p>
<p>Children and young people in contact with the youth justice system.</p>	<p><i>We will continue to progress the work begun by the Youth Justice Scoping Study to improve outcomes for all children in, or at risk of entering, the youth justice system.</i></p>
<p>Looked after and care experienced children and young people.</p>	<p><i>We will progress a new Strategy for looked after children, ‘A Life Deserved: “Caring” for Children and Young People in Northern Ireland’, which aims to: support families at an early stage, providing intensive support for children, young people and their families where the risk of entry into care is high; secure earlier permanence and stability for children and young people in care, enabling them to build positive and supportive relationships; support children and young people returning home from care, and their families; and extend support for care leavers to help them make a successful transition into independent living as adults.</i></p>

- 2.16 The Strategy envisaged that other Executive Strategies and Departmental policies, strategies and programmes would align to deliver its high-level outcomes for children.
- 2.17 As outlined in the introduction to this Report, the CPSOG provided cross-Departmental strategic direction on existing and emerging child protection issues (changes to the governance model supporting child criminal exploitation are discussed later in this Chapter). The CPSOG was chaired by the DoH with the DoJ as a core member. The CPSOG had overseen the delivery of work to address child sexual exploitation and specifically the Marshall Report and CJI's 2020 child sexual exploitation recommendations.
- 2.18 In 2023 the CPSOG agreed a two-year cross-Departmental action plan²⁸ to create a co-ordinated, system-wide response to child criminal exploitation in Northern Ireland. This was published along with a definition of child criminal exploitation that had been developed by a cross-Departmental Task and Finish Group (working from December 2021 to February 2023) to consider what arrangements were currently in place and what improvements could be made. Representatives of the PSNI and YJA were members of the Task and Finish Group and it was jointly led by the DoJ.
- 2.19 The cross-Departmental action plan was informed by the 2021²⁹ NICCY advice paper produced in response to disorder involving young people at that time. The NICCY paper called for a *'unified strategic approach to protect children from harm including abuse, violence, coercion and exploitation by organised gangs and groups.'* The Commissioner urged that the response be embedded in safeguarding and children in need processes.
- 2.20 The cross-Departmental action plan also built on EPPOC work to develop an evidence-based understanding and service provision for young people at risk of, and experiencing, child criminal exploitation. The work of the Child Criminal Exploitation Task and Finish Group provided an opportunity to broaden EPPOC's work and contribute to the delivery of Recommendation B13 in the EPPOC action plan to address underlying issues that put some young people at a higher risk of being exploited by paramilitaries.
- 2.21 The cross-Departmental action plan set out actions under four themes:
- increase awareness and building confidence and capability;
 - prevent harm and abuse to children and young people;
 - protect and intervene where children are abused and exploited; and
 - pursue those who seek to harm, abuse and exploit children.

28 DoJ, *Child criminal exploitation: Action Plan, September 2024* available at <https://www.justice-ni.gov.uk/publications/child-criminal-exploitation-action-plan>.

29 NICCY, *Advice to Government – Child criminal exploitation – safeguarding Children and Young People from Abuse and Exploitation, July 2021* available at [Advice to Government - Child criminal exploitation - Safeguarding Children and Young People from Abuse and Exploitation. - Niccy](#)

2.22 A summary of the key elements of the cross-Departmental action plan is set out in Table 2.

Table 2: Summary of the key elements of the cross-Departmental action plan

Theme	Action(s)
Increasing awareness and building confidence and capability.	<ul style="list-style-type: none"> • Agree definition, accompanying narrative and develop a child friendly version of the definition and other materials. • Develop and implement trauma-informed multi-agency awareness raising and training programme for front-line practitioners and their managers. • Increase awareness of modern slavery and human trafficking offences for children and whether it is in a child's best interests to refer to the NRM. • Agree a data development agenda to help create a shared understanding of the nature and scale of child criminal exploitation. • Develop and implement a public information/awareness campaign to support children and their families and carers to recognise the signs and indicators of child criminal exploitation. • Consider the findings and recommendations of future reviews and inspections.
Prevent harm and abuse to children and young people.	<ul style="list-style-type: none"> • Reconfigure the SBNI Child Sexual Exploitation Subgroup to a Child Exploitation Subgroup. • Ensure policy, strategy and guidance supports joint/multi-agency working to protect children from all forms of exploitation including: <ul style="list-style-type: none"> - decide on the inclusion of children and young people within the scope of multi-agency support hubs; - examine the effectiveness of existing Trust-led family support services; - ensure children are supported to critically engage with issues such as child criminal exploitation and violence; - consider a gender conscious approach to policy and practice; and - establish clear practice guidelines and training to enhance information sharing.
Protect and intervene where children are abused and exploited.	<ul style="list-style-type: none"> • Enhance as necessary existing multi-agency child protection arrangements to ensure that the criminal exploitation of children is recognised and addressed alongside the pursuit of those who exploit them. • Develop a child exploitation risk assessment toolkit and guidance for practitioners. • Develop and introduce a training programme for front-line practitioners on the application of the toolkit
Pursue those who seek to harm, abuse and exploit children.	<ul style="list-style-type: none"> • Set out the existing powers available to all relevant agencies to tackle child criminal exploitation. • Maximise the existing modern slavery and human trafficking legislation to prosecute those who exploit children and where appropriate confiscate their criminal assets. • Utilise proposed new offences of 'directing' and 'participating' in organised crime. • Explore the use of a network mapping exercise as part of the system response to prevent child criminal exploitation and inform proactive policing and prosecutions.

2.23 The DoJ and criminal justice organisations had lead responsibility for the actions under the fourth theme and contributed to work being taken forward under the other strands. The actions set out in the cross-Departmental action plan were sound and came from a considered evidence base that also appeared to address much of the learning emerging from inspections and inquiries as set out in Chapter 1. Inspectors considered that a focus on awareness raising of modern slavery and human trafficking defences available to children, as well as offences would also be helpful. In addition, CJI's 2020 Modern Slavery and Human Trafficking Inspection highlighted a limited focus on outcomes from investigation of offences where the victim was a child and that this type of focus under 'pursue' is an important addition to awareness raising and welfare responses. It was also important to ensure that in implementing responses to child criminal exploitation, that child-first responses were embedded in how all parts of the criminal justice system responded to children and what outcomes the actions were intended to achieve in the long term.

CRIMINAL JUSTICE SYSTEM STRATEGY AND POLICY

2.24 Neither the DoJ nor any of the criminal justice organisations had a specific strategy for child criminal exploitation. Most existing strategy, policy and guidance documentation did not reference child criminal exploitation with a number of exceptions. The DoJ's 2024-27 Modern Slavery and Human Trafficking Strategy made specific reference to child criminal exploitation and since 2021 the YJA had begun to reference child criminal exploitation and monitor individual cases of concern under its safeguarding procedures.

2.25 There were, however, existing strategies, policies and procedures related to, for example, modern slavery and human trafficking, children and young people, safeguarding strategies and some policies and guidance specifically related to child sexual exploitation. For example, PPS Prosecutors who spoke with Inspectors considered that existing guidance such as the Code for Prosecutors, Guidelines for the Prosecution of Young People and its Modern Slavery and Human Trafficking Policy was sufficient to allow consideration of different forms of child exploitation including child criminal exploitation. Existing policies and guidance could be expanded to develop overarching policies related to child exploitation rather than developing separate approaches for different forms of exploitation as the underlying principles were the same. This would also allow for a more agile response to emerging risks as cited in the Marshall Report. For example, both criminal justice staff and stakeholders raised the role of online exploitation as an area of concern. It would be important however, in conflating all forms of exploitation that responses to specific forms of abuse continued to be distinguished.

2.26 Most criminal justice organisations advised that they were awaiting the development and roll-out of ‘products’ being developed under the cross-Departmental action plan such as awareness and training tools, the agreement of a data development tool and child exploitation risk assessment toolkit and guidance before creating new or amending existing strategies, policies and guidance. While this was partly understandable and work to take forward the actions set out in the action plan was progressing, this limited how staff across different organisations were responding to children who were experiencing or were at risk of child criminal exploitation.

Policing

2.27 Within policing, vulnerability was a key strategic priority for the PSNI. Child abuse, child sexual exploitation, missing and absent people and modern slavery and human trafficking were among the 13 strands of vulnerability recognised within the PSNI’s Vulnerability Strategy which was under review. The latter was inter-operable with the PSNI’s Children and Young Person’s Strategy (undated)³⁰ and Serious and Organised Crime Strategy.³¹ The former set out the PSNI’s commitments to children and young people across five themes. Under the safety and protection theme there was reference to specially trained Child Protection Officers whose role was to minimise risk of sexual harm and exploitation but in practice, these specialist officers responded to child sexual exploitation rather than wider exploitation risks. The aim of the Serious and Organised Crime strategy was to better recognise, understand and respond to organised crime to reduce the significant harm caused by this type of criminality and its potential to exploit vulnerable people, including children. Policy responsibility for the strategies listed above sat in different places within the PSNI and while their inter-operability was recognised, how these strategies aligned, where ownership of child criminal exploitation policy and implementation rested or how effective the response to children in contact with the police was understood was not clear to Inspectors (see further comment at paragraphs 3.28).

2.28 The *Northern Ireland Policing Plan 2025-2030*³² (‘the Plan’) for the first time introduced indicators to monitor the PSNI’s effectiveness in tackling child criminal exploitation. Quantitative measures included the number and rate of repeat child victims and offenders, the number of child victims at risk of child sexual exploitation and number of children no longer deemed at risk and the number of child referrals to the NRM. Qualitative measures in the Plan were to report on training and initiatives to tackle child criminal exploitation and on the PSNI’s Children and Young People Strategy. The inclusion of specific child criminal exploitation indicators meant that questions of ownership were being gripped by the PSNI to report on its performance to the Northern Ireland Policing Board.

30 PSNI, *Children and Young People Strategy* available at <https://www.psni.police.uk/sites/default/files/2025-09/Children%20and%20Young%20People%20Strategy.pdf>.
 31 PSNI, *Serious and Organised Crime Strategy 2022-23* available at <https://www.psni.police.uk/sites/default/files/2022-09/serious-and-organised-crime-strategy-spreads-.pdf>.
 32 Northern Ireland Policing Board, *Northern Ireland Policing Plan 2025-2030, April 2025* available at https://www.nipolicingboard.org.uk/files/nipolicingboard/2025-04/Policing%20Plan%202025-30%20-%20Plan%20on%20a%20page%20-%20English%20-%20Final_0.pdf#:~:text=The%20Policing%20Plan%20sets%20out%20how%20the%20PSNI,to%20deliver%20for%20the%20people%20of%20Northern%20Ireland.

2.29 The DoJ Modern Slavery and Human Trafficking Strategy 2024-27, reflected actions identified in the child criminal exploitation action plan to raise awareness of the offences related to children in the existing modern slavery legislation and use of the NRM, as well as actions to maximise existing Modern Slavery and Human Trafficking legislative powers to prosecute those who exploit children and, where appropriate, confiscate the criminal assets of perpetrators to help to undermine the economic motivation that fuels the exploitation of children. Strategy consultation respondents suggested that more training should be provided on the use of the Section 22 defence and that the number of positive and negative cases where it had been referenced should be recorded. While the action plan noted the completion of reviews on the use of the Section 22 defence by the PSNI and the PPS, Inspectors would encourage the DoJ to include this as a measure alongside their monitoring of the utilisation of modern slavery and human trafficking offences under the Pursue strand of the 2024-27 Strategy.

GOVERNANCE

- 2.30 In the following paragraphs, the oversight and governance of the work to develop a response to child criminal exploitation in Northern Ireland are described and the contribution of the criminal justice organisations to these groups is assessed as well as each organisation's oversight and governance arrangements.
- 2.31 There were three key Groups with responsibilities for different aspects of oversight and delivery.

Table 3: Summary of oversight and governance arrangements

DE Children and Young People's Strategy Monitoring and Reporting Board <i>(Subsumed the work of the CPSOG).</i>	
Chaired: DE Attendees: DoH, DoJ, DE, Department for Communities (DfC), The Executive Office (TEO), Department of Finance (DoF), EA, SBNI, HSCTs and PSNI	Meets annually
Responsible for supporting the collaboration and co-ordination of all policy matters affecting children and young people and monitor progress of the Children and Young Person's Strategy against the outcomes and indicators.	
Address matters escalated by the Children and Young Person's Strategy Child Protection Group.	

Children and Young People's Strategy Child Protection Group

(Previously the CPSOG Subgroup)

Chaired: Jointly by DoH, DoJ and DE
 Attendees: DoH, DoJ, DE, DfC, TEO, DoF, EA, SBNI, HSCTs, PSNI, DoH Strategic Planning and Performance Group and EPPOC

Meets three to four times a year

Responsible for providing strategic direction and ensuring a joined-up approach to child protection across the Executive including:

- collectively driving forward implementation of joint (cross-Departmental/ interagency) work relating to child protection;
- providing connectivity between the group and relevant SBNI groups including the SBNI Child Exploitation Committee; and
- escalating issues that require cross-Departmental decisions by Ministers to the Strategy Monitoring and Reporting Board.

Work Plan: To take forward child protection issues identified in the Children and Young People's Strategy.

SBNI Child Exploitation Committee

(Previously the SBNI Child Sexual Exploitation Subgroup)

Chaired: D/Superintendent Public Protection Branch PSNI
 Attendees: SBNI, PSNI, HSCTs, Barnardo's NI, National Society for the Prevention of Cruelty to Children, Action for Children, EA, Catholic Council for Maintained Schools, Strategic Partnership and Planning Group, YJA, PBNI, Society of Local Authority Chief Executives and the PPS.

Meets quarterly

Responsible for providing strategic guidance and direction to the SBNI on existing or emerging child protection and safeguarding issues in relation to child exploitation, namely: sexual, criminal and right-wing extremism by:

- raising awareness of child exploitation and seeking the involvement of and listening to the voices of children and their families and carers to influence key decisions;
- developing workforce policy and community understanding of child exploitation; and
- assisting SBNI members by identifying good policy and reporting to the SBNI Board on implementation of the Committee's workplan.

The Chair of the Child Exploitation Committee as well as reporting to the Independent Chair of the SBNI and SBNI Board, also reported to the CPSOG Subgroup (now the Child Protection Group). (The SBNI is only accountable to the DoH).

PSNI representatives included: Public Protection Branch, Organised Crime Branch, Chief Inspector Local Policing, Strategic Partnerships, Prevention and Community Engagement, Missing Persons Constable.

- 2.32 Governance mechanisms to oversee the delivery of the two-year cross-Departmental action plan had changed but the new oversight arrangements had not convened during inspection fieldwork. Samples of previous minutes of the CPSOG Subgroup and SBNI Child Sexual Exploitation/Child Exploitation Committee were reviewed and interviewees were invited to comment on the effectiveness of the groups and of the contribution of criminal justice organisations to them.
- 2.33 The Deputy Director of the DoJ's International Criminal Justice Co-operation Unit (incorporating the Modern Slavery, Human Trafficking Branch) within the Safer Communities Directorate had jointly chaired the CPSOG Subgroup and attended CPSOG and would chair the newly formed Child Protection Group on a rotational basis with the DoH and DE.
- 2.34 Each criminal justice organisation had appointed a child exploitation Lead who represented their organisation on the SBNI Child Exploitation Committee. The PSNI was represented at the DE Children and Young People's Strategy Child Protection Group ('Child Protection Group'). Members regularly attended meetings and representation by the various criminal justice organisations was broadly consistent. Under the SBNI's Child Exploitation Committee's Terms of Reference, members were expected to support the SBNI Child Exploitation Lead in delivering SBNI assigned actions in the cross-Departmental action plan. This included reviewing and approving resources developed by the Committee and supporting communication including within their own organisation. That was mostly evident among criminal justice organisations although there was insufficient clarity reflected in meeting minutes about where PSNI lead responsibility for child criminal exploitation sat. Inspectors were told that the different policing representatives would each cascade information and take forward implementation within their respective areas. However, given the breadth of child criminal exploitation and potential interfaces with police across so many areas of frontline and specialist policing; Inspectors considered a more co-ordinated approach was required by the PSNI.
- 2.35 The YJA had established a working group comprising its Child Exploitation Champions (for community and custodial services) and was meeting to support the implementation of products emerging from the child criminal exploitation action plan. This approach had not been replicated in other criminal justice organisations. The YJA's Board under its Safeguarding Group routinely monitored child protection issues and reports of concern. Within the DoJ, child criminal exploitation and wider child exploitation matters had been included within the remit of the Modern Slavery and Human Trafficking Subgroup and Non-Governmental Organisation Group with changes to membership made to reflect this.

- 2.36 While this Inspection’s remit was focused on the effectiveness of the criminal justice system response to child criminal exploitation, Inspectors considered there was scope to strengthen the governance arrangements around the delivery of the actions set out in the cross-Departmental action plan and specifically concerning the ownership, timeliness and assessment of outputs. While it was helpful that agencies and Departments shared information updates, it was important that the Child Protection Group robustly drove the response to child criminal exploitation and had effective mechanisms to provide assurance on the effectiveness of what that work had delivered. Although the cross-Departmental action plan had largely been devised since early 2023, it did not have a robust delivery plan. Timescales had slipped on a number of actions and it was not evident, for example, for criminal justice led actions why such lengthy lead-in times were needed for specific actions such as setting out existing powers available to all agencies to tackle child criminal exploitation and maximise the use of modern slavery and trafficking legislative powers that had been in existence for a decade.
- 2.37 The SBNI Child Exploitation Committee oversaw the work being taken forward against the actions assigned to the SBNI through its own reporting arrangements. Inspectors felt there was a gap in the cohesiveness of the reporting mechanism both across the criminal justice system and to the Child Protection Group. There had been a discussion about how the work being taken forward by the Departments was reported and a reporting tool had been devised so that the SBNI Child Exploitation Committee was updated on the entirety of the work set out in the cross-Departmental action plan. The primary purpose of this tool was to report to the Child Protection Group. The SBNI was responsible for updating the then CPSOG Subgroup.
- 2.38 The SBNI was leading on a benefits realisation plan but were clear with Inspectors that its Child Exploitation Committee was not the accountability mechanism; and that was the responsibility of the Children and Young People’s Strategy Child Protection Group. Inspectors therefore considered there was a gap in the accountability mechanism to deliver the child criminal exploitation action plan but also more generally, how improved outcomes for children at risk of or who had experienced child exploitation were being monitored.
- 2.39 CJI’s 2025 Child Sexual Exploitation Follow-Up Review found that there was no routine forum for the DoJ to convene with criminal justice partners to examine the issues within its sphere of influence and gaps in the type of information to ensure that the DoJ understood the quality of criminal justice responses (see response to progress against Strategic Recommendation 1). The Follow-Up Review also identified that improvements were needed to enhance the types of data available to analysts and leaders to evidence how the intelligence was being used strategically to achieve better outcomes for victims (see response to progress against Strategic Recommendation 2). The same gaps were identified for child criminal exploitation.

- 2.40 The DoJ's Modern Slavery and Human Trafficking Subgroup (under the Organised Crime Task Force Strategy Group) regularly considered child criminal exploitation updates; these mostly related to work the DoJ was taking forward and the Group more widely reviewed statistics related to NRM referrals and investigations. Child criminal exploitation was also considered by the Non-Governmental Organisations' Engagement Group on Modern Slavery, Human Trafficking and Child Exploitation with its membership updated to ensure that relevant partners could raise issues related to child exploitation at this forum. The Organised Crime Task Force Strategy Group similarly reviewed updates from attending organisations. These meetings tended to be output/activity centric and there was no specific focus on drawing out outcomes for children. At a June 2024 meeting, the PSNI had raised the need to understand better how young people were being exploited and used to supply drugs. The Group had also identified the importance of their strategic approach having a benefits framework so that all partners were clear on what impact they were making collectively. Inspectors agreed with this.
- 2.41 The DoJ and criminal justice organisations needed to come together to agree a framework about criminal justice system outcomes for children who had experienced or who were at risk of child criminal exploitation and other forms of exploitation. This would facilitate collaboration across the criminal justice system, enable justice responses to child criminal exploitation to be assessed and monitored to baseline the current position, inform practice and to assess whether there were gaps which could enhance the overall criminal justice system's response to tackling the criminal exploitation of children. This would be particularly timely given the planned introduction of a specific child criminal exploitation offence in Northern Ireland. It would be important to monitor the intersect between this new offence and existing modern slavery and human trafficking legislation. It should also take account of the learning from CJI's 2025 Child Sexual Exploitation Follow-Up Review of the importance of strategic monitoring of outcomes across the criminal justice system to enable blockages and challenges that impact on operational delivery to be resolved. The outworkings of this framework would help better inform DoJ contributions to cross-Departmental oversight groups on child criminal exploitation and influence emerging child protection issues to deliver better outcomes for children.

STRATEGIC RECOMMENDATION 1

Within six months of the publication of this report, the Department of Justice, working in collaboration with criminal justice organisations, should develop a strategic framework which baselines how the criminal justice system is tackling child criminal exploitation, sets out indicators of success and develop and implement an effective mechanism to monitor criminal justice outcomes. This framework should be used to inform and influence the Department of Justice's contributions to cross-Departmental oversight of child criminal exploitation and emerging child protection issues.

PARTNERSHIP WORKING

- 2.42 Partnership working by justice organisations within the SBNI Child Exploitation Committee and in the former CPSOG Subgroup was effective. Stakeholders reported attendees had been engaged and supportive of developments particularly the YJA, the PPS and the PSNI Public Protection Branch. There was good input provided to meetings and workshops.
- 2.43 PSNI specialist teams and the PPS reported close partnership working particularly in respect of children, victims of sexual violence and serious and organised crime. These were underpinned by information sharing protocols and strategic partnership meetings between senior management in the different criminal justice organisations although child criminal exploitation was not a specific feature of these meetings.
- 2.44 Stakeholder groups and individuals consulted during the inspection reported positive individual relationships particularly with Neighbourhood Policing Teams and the PSNI's Public Protection Branch but generally they experienced an inconsistent approach, siloed working and a lack of a coherent organisational response to child criminal exploitation within the PSNI. Positive relationships were reported with the PPS and the YJA at a strategic and operational level.
- 2.45 A gap identified during the Inspection was in the strategic partnership between the PSNI and HSCTs regarding missing children. There was not a sufficiently good understanding of the respective roles and responsibilities of the PSNI and HSCTs in response to children who were reported missing at both a strategic and operational level.
- 2.46 An Interface Protocol between the PSNI and HSCTs was in place and set out the steps to be followed when a child or young person was reported missing and in respect of police interactions with residential children's homes. It particularly focused on the interfaces between the organisations but there was not a specific PSNI or multi-agency protocol focused on protecting children who go missing. This gap was reflected in the minutes of joint PSNI/HSCT Operational and Strategic Missing Group meetings. Strategic oversight meetings, for example, did not appear to Inspectors to be sufficiently strategic. Further detail on the operation of the protocol and responses to children reported missing are set out in Chapter 3.

CHAPTER 3: DELIVERY

- 3.1 This Chapter sets out the findings in relation to the operational response to child criminal exploitation by criminal justice organisations including how well its nature and scale are understood, how effective operational responses were and how well children, their families and carers were supported and safeguarded. The findings were informed by a range of evidence including case audits conducted of PSNI and PPS files.
- 3.2 The case audits formed an important element of the assessment of how effective current criminal justice responses were. The audits specifically examined the response to child criminal exploitation rather than the quality of investigations or decision-making. Supported by Inspectors from HMICFRS, the Inspection Team reviewed 34 PSNI files. As no child criminal exploitation marker was available on the PSNI information systems, cases were selected from an initial review of records where Inspectors deemed a risk of child criminal exploitation might present. These included custody cases related to public order, theft and drug offences, missing children reports, cases where children had been notified of a threat to their life and NRM referral records. The YJA flagged two cases it considered had a risk of child criminal exploitation which were included in the PSNI sample. Where PSNI records indicated a file had been passed to the PPS, these were also sampled (12) to assess what had been flagged to Prosecutors and how that had been responded to. Further information on the case audit sample is provided at Appendix 2.
- 3.3 Public awareness about the signs of exploitation and abuse, the importance of reporting concerns and the effectiveness of mechanisms to do that were also considered.

NATURE AND SCALE OF CHILD CRIMINAL EXPLOITATION

- 3.4 Despite recognition of child criminal exploitation as a growing child protection priority, there was no mechanism to understand its nature and scale in Northern Ireland. This was not unique to Northern Ireland and the Jay Review and other reports had cited the lack of a legal definition of child criminal exploitation resulting in there being no comprehensive data collection across the UK. This was also likely to be compounded by the hidden nature of modern slavery and human trafficking in general, as well as a lack of recognition of child criminal exploitation.

- 3.5 In other parts of the UK, the number of referrals to the NRM was used to indicate the scale of child criminal exploitation. The National Crime Agency National Strategic Assessment 2025³³ continued to report modern slavery and human trafficking as a threat with no change in its overall nature and scale. NRM data from October 2023 to September 2024 showed that 54% of referrals for exploitation in the UK were for UK nationals of which almost 80% involved exploitation in criminal activity. Children were frequently recruited to move and sell drugs often due to perceptions that they were less likely to be arrested and were easier to control and manipulate.
- 3.6 However, NRM referral data for Northern Ireland could not provide the same indication of the scale of child criminal exploitation due to the consistently low number of referrals made in comparison to other parts of the UK. An analysis of NRM data in a recent research report reported that since 2015 when the first child was referred to the NRM in Northern Ireland, no male UK or Irish child had ever been referred to the NRM for any form of exploitation in Northern Ireland. This was despite the legacy of the past and continued presence of paramilitarism and operation of organised crime gangs in Northern Ireland.

Table 4: UK NRM referral data including NI breakdown of child victims

UK (Since 2014 to the end of 2024)	NI (Since 2014 to end of 2024)
45,502 children referred to the NRM.	
Of which, 15,094 children had been identified as potential victims of child criminal exploitation only.	FOUR children had been referred as potential victims of child criminal exploitation.
10,762 of these were UK male children (75%).	NONE of the four children were a UK or Irish male child.
5,726 of these UK children were noted as county lines cases.	

Source: Identifying modern slavery and human trafficking in the context of child criminal exploitation in Northern Ireland research report, June 2025

³³ National Crime Agency, *National Strategic Assessment 2025 of Serious and Organised Crime* available at <https://www.nationalcrimeagency.gov.uk/threats-2025/nsa-msht-2025>.

- 3.7 In its written evidence³⁴ to the Northern Ireland Affairs Committee Inquiry on the effect of paramilitary and organised crime on society in Northern Ireland report, the EPPOC advised that its most recent data showed that paramilitarism remained pervasive but a relatively localised phenomenon in Northern Ireland with serious harm concentrated in Belfast, Derry/Londonderry, Mid and East Antrim and Ards and North Down. The nature and extent of child criminal exploitation was one of three specific evidence gaps that had been identified at that time.
- 3.8 Research commissioned by the SBNI explored a methodology to predict where child criminal exploitation might cluster in Northern Ireland to assist organisations (including criminal justice organisations), if validated, to identify where best and which resources are deployed to most effectively protect children from child criminal exploitation. The research indicated that Belfast and Derry City and Strabane had the highest proportion of wards where children were likely to be at risk of child criminal exploitation based on an analysis of factors likely to elevate the risk of child criminal exploitation.
- 3.9 In response to a recommendation made in CJJ's 2020 Child Sexual Exploitation inspection, the PSNI had been leading on the development of a comprehensive problem profile for child sexual exploitation and it was an evolving and ongoing process. This was possible as the methodology relied on extracting data from police systems in relation to child sexual exploitation occurrences and investigations. It also compared reports published by other external parties to contextualise the findings. While further work was required to show how the findings were used to inform service improvements, the profile was helpful in identifying a victim profile, understanding the relationship between child sexual exploitation and missing children, persons of concern and victim/perpetrator relationships. An assessment of group-based exploitation and online child sexual exploitation was also included.
- 3.10 There were no child criminal exploitation specific flags or warning markers related to victims or suspects of child criminal exploitation on case management systems which meant individually and collectively across criminal justice organisations, data on its prevalence within a justice context could not be extracted. Consequently, the criminal justice system did not understand the nature and scale of child criminal exploitation in Northern Ireland.
- 3.11 There was limited awareness of the agreed definition of child criminal exploitation for Northern Ireland within criminal justice organisations apart from those who were directly involved in working groups to develop the response to child criminal exploitation. However, when speaking with groups of officers and staff, some practitioners recognised and discussed examples of child criminal exploitation. There was much less awareness or little awareness of the NRM or recognition of child criminal exploitation as modern slavery, particularly among Police Officers.

34 EPPOC, *Written evidence submitted by the Executive Programme on Paramilitarism and Organised Crime, relating to the effect of the paramilitaries on society in Northern Ireland inquiry (PNI0024)* available at <https://committees.parliament.uk/writtenevidence/111013/html/>.

3.12 The awareness and training currently being developed under the cross-Departmental action plan should help staff across the criminal justice system to better understand what child criminal exploitation was and to consistently recognise, report and tackle it.

Policing

3.13 Senior police leaders had been proactive in publicly describing children being drawn into recent public order disturbances as child criminal exploitation which was positive and indicated growing awareness. However, the PSNI did not have a holistic picture of the prevalence of child criminal exploitation as it was not able to, in the absence of a warning marker or flag, extract information from police record management systems across different crime types. There was nothing on police systems to indicate to frontline Police Officers any specific risks around child criminal exploitation they should be aware of in their dealings with children.

3.14 In one instance Inspectors saw that an existing child at risk flag had been used by Police Officers to identify a child's vulnerability to child criminal exploitation. There was a further instance in PSNI records of a child sexual exploitation flag being used to highlight a risk of child criminal exploitation in the absence of a child criminal exploitation specific marker or flag.

3.15 There were few analytical products to help the police understand the nature and scale of child criminal exploitation. An attempt had been made to develop a child exploitation analytical report during 2024, but this had been solely based on the judgements made by analysts who had no awareness or training about child criminal exploitation. The analysis related to what had been recorded on the PSNI's Niche™ Records Management System. The analytical report made recommendations to improve the identification and recording of child criminal exploitation but work against these recommendations had not been progressed. Subject (individual) profiles had also been produced on a number of children involved in public disorder in Belfast and Derry/Londonderry during 2024. These set out the details of the offences, criminal history and family history of the children, but did not fully consider the features of child criminal exploitation or factors that made these children vulnerable to exploitation. There was a reliance on children making a disclosure of exploitation and identifying their potential exploiters. There was also a reliance on what had been recorded on Niche™ in reaching conclusions about the information reviewed when it was evident from Inspectors' case audits and speaking with operational staff that there was little recording of this on Niche™.

3.16 Information on the numbers of children potentially at risk of exploitation and adult suspects related to the work of Public Order Enquiry Teams, which investigate large-scale public disorder incidents, was recorded on a separate record management system (the Home Office Large Major Enquiry System (HOLMES)).

While this was being monitored by Senior Investigation Officers, it had not been brought together across different Public Order Enquiry Teams to provide a broader understanding of the number of children and suspects involved nor for a broader thematic analysis of the issues which could be used to inform discussions with partner agencies.

- 3.17 Inspectors asked the PSNI to provide a breakdown of cases involving children as victims and suspects in each of the last three calendar years across a range of areas including Modern Slavery and Human Trafficking, Organised Crime, Paramilitary Crime Task Force, Terrorist Investigation Unit as well as records of children admitted to custody (2024 only), who had been subject to threats to life, reported missing and referrals made to the PSNI Central Referral Unit. While this data did not identify child criminal exploitation risks it was helpful to understand the scale of police involvement with children and of areas where child criminal exploitation risk had the potential to emerge.
- 3.18 The data showed that very small numbers of children came to the attention of police either as suspects, victims or witnesses. This data also included when a child was associated with a suspect but were not actively being investigated or where, for example, they were present during a police search. The number of child suspects and victims recorded across these teams in the three years from 2022-24 numbered less than 15.
- 3.19 In each of the three financial years 2022-23, 2023-24 and 2024-25 on average just over 1,000 children were reported missing to the PSNI. According to PSNI data, approximately 3.5% of these children (37 of 1,069) were recorded as being at risk of child sexual exploitation at the time they were reported missing. Data to indicate the proportion of missing children for whom there was a potential of child criminal exploitation risk or who had care experience was not available.
- 3.20 Fifty-six children had been notified of a Threat to Life notice from 2022-24, the majority of whom (48) were male. They ranged in ages from 10 to 17 years with the average age being 15 years. Ten of the children under threat were aged between 10-13 years. In examining the records of the youngest child, a potential risk of child criminal exploitation had been identified. The majority of notices were issued in Belfast City (23) followed by Derry City and Strabane (seven) and Causeway Coast and Glens (seven) Policing Districts.
- 3.21 For the same period, the police had made a record of 79 NRM referrals, the majority of which were for male children (50). The children ranged in age from 15-17 years. The highest nationality grouping was of Somalian children (36) followed by children from Eritrea (15). One child was from Northern Ireland. The Policing Districts with the largest number of referrals were Belfast City (39), Armagh, Banbridge and Craigavon (11) and Derry City and Strabane (eight).

3.22 During 2024, 3,001 children were held in police custody, the majority of whom were male (2,188, 73%). The children ranged in age from 10-17 years. Four hundred children were aged between 10 and 13 years. Almost half were admitted to Musgrave Custody Suite in Belfast with Waterside/Strabane admitting the second highest proportion at 15% followed by Banbridge (10%). The most prevalent offence types were common assault, criminal damage and assault on police.

3.23 An analysis of this type of data, drawn from across the PSNI, would be useful in helping the PSNI identify and examine emerging trends and patterns of child exploitation.

Public Prosecution Service and other organisations

3.24 As with the police there was no flag or warning marker on the PPS case management system to alert Prosecutors to potential victims of child criminal exploitation or of adult suspects. Neither was there a flag to indicate this on files passed from the PSNI. There was therefore no means currently for the PPS to understand the proportion of cases it processed where child criminal exploitation was a factor.

3.25 A child sexual exploitation flag had been added to the Prosecutor Information Form which was included in the documentation provided by the police when files were being submitted to the PPS for decision. This, however, was not in a form that could be used to interrogate PPS record management systems. There was no comparable flag on the Prosecutor Information Form for child criminal exploitation.

3.26 In the absence of a flag, Prosecutors advised that there was still an opportunity for child criminal exploitation risk to be indicated on the Prosecutor Information Form but clearly this was contingent on those risks being identified and explored by the police during an investigation. Prosecutors reported that child criminal exploitation was not something that was routinely observed in files and this type of information was more likely to be known and disclosed to the Prosecutors by PSNI Youth Diversion Officers and YJA staff where the Agency had previously been involved with a child. While this was helpful, this information becoming known at this stage in a case's journey through the criminal justice system meant that the potential for earlier opportunities to prevent a child being drawn into the formal system could be missed.

3.27 Inspectors were not aware of any ongoing work or plans by the PSNI or other criminal justice organisations to introduce a flag or warning marker to their systems. It was important for the police and other organisations to consider how child criminal exploitation and other emerging forms of child exploitation could adequately be captured on their systems to be able to gain a better understanding of the nature and scale of child criminal exploitation, to assess how effectively their responses were (in conjunction with partner agencies) and whether children were better protected as a result.

EFFECTIVENESS OF THE CRIMINAL JUSTICE SYSTEM RESPONSE TO CHILD CRIMINAL EXPLOITATION

3.28 At an overall level, criminal justice system responses to child criminal exploitation were not effective. Opportunities to identify and respond to the potential for child criminal exploitation were being missed by Police Officers and Prosecutors. There was no formal system to share information about child criminal exploitation risks between police and Prosecutors. Positively the Public Order Enquiry Team investigation strategy documentation related to public order events in Belfast and Derry/Londonderry during 2024 included specific reference to the potential for children to be exploited by adults, and while there was evidence of collaborative working between the PSNI and Prosecutors on these cases, it was not clear from the records reviewed by Inspectors how risks of child criminal exploitation associated with specific children had been considered. Challenges were identified by Police Officers and Prosecutors regarding the evidence required to prove criminal exploitation and the case audits demonstrated an over reliance on the child's admission of guilt and reluctance to name adults who were exploiting them. There was not sufficient understanding of the links between child criminal exploitation, child sexual exploitation and children reported as missing in the files audited and in discussions with Police Officers and Prosecutors. The voice of the child was largely absent in police and prosecution records examined. It appeared to Inspectors that resource pressures within the PSNI, the PPS and within HSCTs were impacting on the response to tackling child criminal exploitation.

Policing

3.29 The PSNI, while having a dedicated resource for the investigation of child sexual exploitation (albeit the staffing of this Team within the Public Protection Branch was significantly depleted during the period of this inspection), had no comparable resource for child criminal exploitation. No pathway had yet been mapped out for how the PSNI would respond operationally to child criminal exploitation nor what its delivery model would look like. During Inspection fieldwork it was clarified that the PSNI's Public Protection Branch would be the policy lead for child criminal exploitation, which seemed appropriate. It was important though that responding to child criminal exploitation was not seen as purely the responsibility of Public Protection Branch but cut across many parts of frontline and specialist policing. This has resonance with the approach to domestic abuse for instance.

3.30 Senior leaders needed to ensure sufficient resources were available to guarantee the PSNI could provide an effective response to child criminal exploitation, child sexual exploitation and emerging child exploitation issues. There was no reference in the PSNI's current case allocation policy as to how these investigations were to be managed or how existing specialist officers and pathways could be accessed. The PSNI had not yet considered what skills, training and experience its staff needed to effectively tackle child criminal exploitation. The full range of Section 75 (of the

Northern Ireland Act 1998) data was not being recorded although ethnicity was mostly being recorded in the cases Inspectors examined. This limited analytical opportunities and wider understanding of trends and patterns. Overall, Inspectors considered that all but three of the 23 cases audited in detail were inadequate. Improvement was required in the remaining three. Child criminal exploitation and organisational readiness to tackle child criminal exploitation was highlighted in a recently published SBNI report that found a statistically significant difference between sectors readiness with police scoring lowest on the scale and statutory youth work highest.³⁵

- 3.31 Inspectors saw and heard about pockets of good practice across the PSNI in relation to individual cases and how the needs of some vulnerable children were being responded to. This included support provided by Multi-Agency Support Hubs most notably in Derry City which took referrals for children; the role of Youth Diversion Officers and strategies led by Organised Crime Branch like Clear, Hold and Build – a Home Office approach (termed Operation Connexus in Northern Ireland) to tackling serious and organised crime which was a locality-based approach. Operation Connexus had been piloted by the PSNI and delivered in conjunction with Local and Neighbourhood Policing Teams to target organised crime gangs and support communities to rebuild. A range of other initiatives and problem-solving approaches by Local and Neighbourhood Policing Teams also aimed to deter children and young people from getting involved in crime and paramilitarism. A promising project in Fermanagh and Omagh had seen Reducing Offending Unit Officers work with a small number of children who were living in children's homes. While in its very early stages, it was promising that an area of focus was on identifying and disrupting those who were exploiting children.
- 3.32 Inspectors spoke to staff involved in the Mid and East Antrim Juvenile Support Hub ('the Hub'). This Hub had initially been established in December 2020 and had been funded by EPPOC until that funding ended in March 2025. The Hub comprised collaborative working across a range of statutory partner agencies including the YJA, as well as community and voluntary sector organisations. Notably, the Northern HSCT had a child criminal exploitation Lead at that time who was also involved in the pilot. The Hub took referrals from a range of agencies for children and young people up to the age of 25 years believed to be at risk of being involved with, influenced by or exploited by paramilitaries with the aim of diverting them from paramilitary activities and offending generally. The identification of child criminal exploitation and interventions to support children at risk was recognised as a gap and the policing team began to focus on utilising the wider skills and experience of the Juvenile Support Officer, Reducing Offending Unit and Youth Diversion Officers working together and across their respective cohorts within the District's Vulnerability and Prevention Hub to share information and co-ordinate

35 SBNI, *A Review of Child criminal exploitation and Organisational Readiness in Northern Ireland: Elevated Risk, Uneven response*, Dr Colm Walsh, Dr Antoinette Kearney Bell and Alan McKinstry, October 2025 available at https://www.safeguardingni.org/sites/default/files/2025-10/CHILD_CRIMINAL_EXPLOITATION%20eReport.pdf.

work thereby reducing siloed working. The Community Planning Sergeant had developed a child criminal exploitation assessment to identify risk factors which was capturing data on children referred to the Hub. The commitment, drive and compassion of the Community Planning Sergeant and Juvenile Support Officer was impressive but whether this work would continue and how it informed approaches in other Districts or the PSNI's corporate response to child criminal exploitation and child exploitation more generally was unclear.

- 3.33 The following case study was provided by the Hub to demonstrate the impact on the lives of children who received support from the Hub and on the demand for policing through preventative work. Although the young person at the time of referral was 18 years old, he was younger when he had first come to the attention of police.

CASE STUDY 1

A male child was referred into the Hub when he was 18 years old but had been known to the police from the age of 14 years. He had a history of being involved in domestic abuse incidents as a suspect and a victim, disorderly behaviour, theft, driving and criminal damage offences, which was fuelled by poly-drug use.

He was frequently in debt to drug dealers and had been approached to join a loyalist paramilitary organisation and although he refused to join this group, he was aligned with other criminal elements.

His heavy drug use had led to a very chaotic lifestyle and poor mental health and he had a history of self-harm and suicide attempts. His relationship with his family had also broken down.

Interventions and support put in place by the Hub included support from: the community addictions and mental health teams; the PBNI; the Drug and Alcohol Intervention Service for Youth, Extern, the YMCA and the NIACRO Aspire mentoring service.

This young person's drug misuse impacted on his engagement with the services he was offered, and he was regularly closed to these services due to his poor engagement. However, the multi-agency approach and help provided by the Juvenile Support Officer maintained continuity of support through this difficult period in his life.

Up until the age of 21, this young person had more than 90 occurrences recorded on the police information system, 20 convictions and he had spent time in prison custody on at least three different occasions.

This young man was now drug free and he had rebuilt relationships with his family. There had been no further recorded incidents by police in over 12 months.

Case study provided by the PSNI.

- 3.34 CJI's 2023 Inspection of Vulnerable Older People³⁶ identified work to agree common terminology and the overarching strategy for Multi-Agency Support Hubs as an Area for Improvement. This Inspection found that there were differences in the titles, terminology, scope and focus of the Hubs. Terms of Reference existed but these varied across the 11 Multi-Agency Support Hubs and membership of the partner agencies also differed. Improved consistency with common language and definition of the role of the Multi-Agency Support Hub would be beneficial to ensure greater understanding within both the PSNI and within partner organisations, with scope to share good practice. There was still an inconsistency in the scope of work across Multi-Agency Support Hubs regarding their work with children. During Inspection fieldwork a decision was pending on the configuration of a Policing District Community Planning Model.
- 3.35 *Another Way* was a new community safety initiative which, at the time of fieldwork, was due to be piloted during summer 2025 and included objectives to reduce violence and exploitation of young people and promote early intervention to prevent young people being involved in harmful lifestyles. Funded by EPPOC, the initial pilot would focus on young people aged 18-24 years in East and South Belfast and the hope was that it would later extend to children between 12-17 years. The project was based on focused deterrence strategy³⁷ and drawn from the Community Initiative to Reduce Violence model successfully adopted by some police forces in England and Wales. The PSNI was a key partner in the pilot and an Implementation Group had been established. Again, it was not clear how this project would interface with other preventative programmes of work being delivered by the PSNI. The PSNI hoped the initiative would increase reporting of, and develop a shared understanding of, child criminal exploitation.
- 3.36 Despite areas of good practice by individual teams and individuals, the PSNI lacked a consistent and coherent approach to how frontline operational and specialist staff worked to support children who were at risk of exploitation. This extended to the readiness of the PSNI to respond to the work set out in the cross-Departmental action plan. Resourcing was a constant feature of practically all discussions with frontline staff and leaders across the organisation which was impacting policing responses to the current demand for service. So too was the difficulty in mainstreaming approaches and building support from other statutory organisations for pilots and other initiatives. It was important that the PSNI understood the impact of all this type of work on the exploitation of children.

36 CJI, *Vulnerable Older People: An Inspection of the Criminal Justice System's approach to Vulnerable Older People in Northern Ireland, September 2023* available at <https://www.cjini.org/wp-content/uploads/2025/05/Vulnerable-older-people-Report-Tagged-FINAL-070923.pdf>

37 The NPCC defined focused deterrence strategies as strategies that targeted prolific or repeat offenders. These strategies combine strict enforcement with improved access to support, sometimes called a carrot and stick approach.

STRATEGIC RECOMMENDATION 2

The Police Service of Northern Ireland should immediately develop an adequately resourced delivery model for the identification, response and disruption of child criminal exploitation across the organisation and plan for the effective operationalisation of the work emerging from the cross-Departmental action plan to tackle child criminal exploitation. This should include a mechanism to monitor the effectiveness of police responses.

- 3.37 Case audits found that the risk of child criminal exploitation was not explicitly identified in the cases reviewed but Inspectors considered there were opportunities in a number of instances for risks of child criminal exploitation to be explored and investigated. There was no evidence that the PSNI effectively investigated or disrupted those suspected of child criminal exploitation in the cases audited by Inspectors. Nor were there indications of early investigative advice being sought from the PPS in the records available to Inspectors (see further comments on Public Order Enquiry Team cases).
- 3.38 Nine cases audited were for public order offences in Belfast and Derry/Londonderry during 2024. It was positive that the Investigative Strategy (Belfast) and Criminal Justice Strategy (Derry/Londonderry) for these policing operations contained specific guidance in relation to juveniles; this included advising that consideration should be given at all stages of the investigation to the potential for children to have been exploited at all stages of the investigation. In such instances, an appropriate plan was to be produced to overcome and prevent child criminal exploitation for consideration with other PSNI branches within the PSNI including Public Protection Branch and HSCTs.
- 3.39 The records examined by Inspectors did not provide assurance that responses to cases where a risk of child criminal exploitation was present was effective. It was difficult to piece together and link cases where individuals were suspected of exploiting children. It was also not clear where a risk of exploitation was a potential factor, how this had been investigated or considered when investigating the criminal offences the children allegedly committed. For some very young children in particular, Inspectors could not see an individual arrest strategy on the Niche™ record. In these and other cases reviewed by Inspectors, the Youth Diversion Officers' recommendations related solely to suitability for diversion or Court disposal. Part of the issue in assessing these cases was that a separate system (HOLMES) for managing major investigations was used for both these operations due to their scale and complexity and there was very little information sharing with Niche™. Through discussions it was clear that a major focus of both operations was the identification of adults and children involved. Inspectors were told of very good collaborative working with HSCTs, Prosecutors and with specialist officers like Reducing Offending Unit Officers and Youth Diversion Officers.

While understanding the requirement to use HOLMES **an Area for Improvement was for relevant information to be recorded on Niche™ so that those who do not have access to HOLMES have sufficient information to consider the circumstances of a child's offending and their risks of exploitation should that child come to the attention of police at some later stage.**

- 3.40 It was clear that the investigation of child criminal exploitation in public disorder offences presented challenges and it would be important that lessons were learned from these investigations including the types of offences to use to pursue perpetrators, the evidence required in these cases and safeguarding of the children involved. This was a further area where there was recent experience of aiming to pursue offenders suspected of child criminal exploitation and one which could inform the PSNI's operational responses to ensure better outcomes for children at risk of exploitation.
- 3.41 While Police Officers spoke to Inspectors about individual cases where they were concerned about a child, the concept of child criminal exploitation was not widely understood by frontline Police Officers or their Supervising Officers nor was it consistently recognised and tackled.

CASE STUDY 2

A 15-year-old girl was stopped by the police in the company of an adult male who was known to police. The child was arrested on suspicion of drug-related offences but the adult was not. The name of the adult was not initially recorded on the occurrence enquiry log but was later referred to as being related to the child. It was not clear from the record who had acted as the child's Appropriate Adult during police interview. The records indicated that the Investigating Officer believed the seized substances belonged to the adult male and that they were being carried by the child. There was record of a telephone call with a Detective Sergeant in the Modern Slavery and Human Trafficking Unit who asked that a referral was made to the PSNI Central Referral Unit as they considered that the matter needed to be dealt with as child criminal exploitation. The outcome of that referral was for the matter to proceed as a police only investigation but that this could be reassessed if the child disclosed anything further. At interview it was recorded that despite the child being provided with the opportunity to explain the circumstances of their arrest, they had declined to do so. Evidence was still being gathered in this case and a file had not yet been passed to the PPS.

The initial assessment in this case did not consider the potential for child criminal exploitation until an intervention from Modern Slavery and Human Trafficking Unit. It was not clear how this arose. While a Central Referral Unit referral was made, the outcome was for a single agency investigation. Both the outcome of the joint protocol investigation referral and the police interview placed a reliance on the child making admissions or disclosure rather than an evidence-led investigation being pursued.

The reluctance of a child to give evidence against their potential exploiter especially in the context of that person being their parent was not adequately recognised. Any additional safeguarding action around this child considering the circumstances of this case were not evident to Inspectors.

It was important that Officers are aware of the potential risks of child criminal exploitation to be able to identify its potential at the earliest opportunity to avoid victim blaming and to ensure that a full investigation strategy is in place which places the welfare of the child at the centre of the investigation and for timely and appropriate referrals to be made.

- 3.42 In this case study and in other cases Inspectors identified missed opportunities to consider exploitation risks with the result that opportunities to identify suspects, disrupt their activity and to pursue evidence-led prosecutions were missed. Largely Police Officers saw their role as investigating whether a criminal offence had been committed rather than considering the wider circumstances around a child's offending or the nature and pattern of their offending.
- 3.43 In cases where children and their families had been notified of threats made to a child's life, Inspectors found that initial contacts appeared to be good and timely and there was evidence of effective partnership working with a range of agencies. Inspectors considered that the immediate risk to children had been dealt with appropriately and in a timely way. However, there was no evidence in these cases of child criminal exploitation being considered or investigated despite some of these children coming to the attention of police frequently, and in some instances, from a very young age.
- 3.44 Across all of the case types reviewed the voice of the child was rarely recorded so Inspectors did not have any insight into whether a child's lived experience had been listened to or understood, whether their wishes had been considered during the investigation process and if consideration of their demeanour, welfare and needs had been taken account of and decisions made in their best interests. This was a theme that had emerged in recent CJI Reviews of the *Domestic Abuse and Civil Proceedings Act (Northern Ireland) 2021*.³⁸ Inspectors noted the recent publication of the National Police Chiefs' Council Children and Young Persons Policing Charter 2025³⁹ that included the voice of the child as one of three key pillars to deliver child-centred policing.

38 CJI's Annual Review Reports of the Domestic Abuse and Civil Proceedings Act (Northern Ireland) 2021 are available at <https://www.cjini.org/report-category/domestic-and-sexual-abuse/>.

39 NPCC, *Children and Young Persons Policing Charter 2025* October 2025 available at <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/local-policing-coordination-committee/2025/cyp-charter-final-2025.pdf>

CASE STUDY 3

A 17-year-old boy was believed to be dealing drugs and as a direct result, a threat to his wellbeing had been made which the police believed may have involved him being harmed. There was good initial contact with the child and their family in dealing with the initial risk and ensuring both the child and their parents were aware of the threat. There was also a good initial assessment carried out by a PSNI Inspector and joint risk assessments and investigations between the police, social services and other partner agencies. The outcome of these were recorded and accessible on the police system. There was evidence of good contact between social workers and the police. The investigation was completed well with the rationale and strategy well-documented. Actions had been taken to reduce the risk to the child. The voice of the child had been recorded in respect of joint protocol investigation referrals.

As an area for improvement the investigation had not considered that the victim may have been a victim of child criminal exploitation when the circumstances suggested this was a possibility. Several threats had been made against this child and he had regular contact with the police but it did not appear that anyone had explored the question why. It was positive that the child had been spoken to each time and a joint protocol investigation referral was recorded but there was an opportunity to more regularly record their feelings, circumstance or anything else about their situation other than their view on the threat to them.

CHILDREN WHO ARE REPORTED MISSING AND UNDERSTANDING OF THE RELATIONSHIP BETWEEN MISSING EPISODES AND CHILD EXPLOITATION

3.45 The relationship between child criminal exploitation, child sexual exploitation and missing children was not well understood. In the case audits and in the discussions with Police Officers, Inspectors read and heard victim blaming language and a fatigue about responding to missing children reports. The following were examples extracted from case audits:

- 14-year-old boy reported as a concern for safety: *'The mention of drugs use is a general lifestyle pattern rather than an identifiable immediate risk.'*
- 17-year-old girl living in secure care reported as concern for safety and later changed to a missing person report: *'Risk assessment by Inspector states regular occurrence and not out of character.'*

3.46 From the cases reviewed as part of the case audit for this inspection, Inspectors identified a broader concern about the PSNI's approach and response to children who were reported missing and/or those reported on the police information system as a concern for safety.⁴⁰ This included records related to care experienced

⁴⁰ A concern for safety is defined in the Interface Protocol between HSCs and PSNI as a request for police to check on the safety of someone who is believed to be vulnerable or at risk of harm for a wide variety of reasons. This request may be more appropriate than a missing report where the location of the child/young person is known or suspected, and the carer believes it is unsafe to take action. The request should involve being specific about police action required.

children. Children whose whereabouts were unknown and who were at risk of harm were being recorded on the police information system as a 'concern for safety' even though they were in fact missing from a children's home or secure care. They were not consequently receiving a missing person response as set out in the PSNI's Missing Persons Investigations Service Instruction to mitigate any further risk of harm including exploitation. Inspectors further observed that children had disclosed abuse while they had been missing. The more some children were reported missing the less risk appeared to be being attached by the PSNI to their missing episodes, despite a body of research which indicated that children and young people missing from care were more susceptible to exploitation, misuse of drugs and/or alcohol and being involved in harmful behaviour.

CASE STUDY 4

Missing episodes for a 13-year-old child living in a children's home were recorded as concerns for safety. Despite the child being only 13-years-old there was rarely action recorded to try to find this child when police were notified.

Following one incident when the child and another child from the same children's home had been missing for six days, police were notified of a report that the two children had been at a hotel. The police were told that the 13-year-old child had been sexually abused by an unknown adult male in the hotel room.

Nine days following this report police recorded a call from the children's home to say that the same 13-year-old child had left the children's home with another child five hours earlier and HSCT staff had not been able to contact them since. The call was recorded as a concern for safety rather than a missing person's report. It was documented that the 13-year-old child had used drugs the day before. No actions were recorded on the police occurrence log until the morning of the following day (some 16 hours later) when there was an entry to say that both children had returned safe and well with no issues. A THRIVE⁴¹ had been completed identifying risk due to the age of the child, drug involvement and risk of child sexual exploitation and the call was set as priority but later closed as resolved without deployment.

In this case, Inspectors considered that despite the child's disappearance being reported as a concern for safety, given the circumstances of the child and the recent report of the child being sexually abused which was under investigation, the child should have been regarded by the PSNI as a missing child and received a more immediate response.

In this and other occurrences when missing reports had been created although immediate safe and well checks were recorded as having been completed, no details were recorded.

Inspectors also noted a lack of referrals to HSCTs or strategy meetings were visible on police records.

41 THRIVE was the call assessment mnemonic used to identify Threat, Harm, Risk, Investigation, Vulnerability and Engagement.

- 3.47 Inspectors were further concerned about how a Joint Interface Protocol between HSCTs and the PSNI (updated in September 2024)⁴² was being operationalised. This centred around how the Protocol was being used and how effectively the governance arrangements provided for in the Protocol were protecting children from harm.
- 3.48 Inspectors saw examples where a response to children who had been reported missing was delayed until a fully completed Philomena Protocol⁴³ had been completed. While Inspectors understood the intent of the Philomena Protocol was to be a live document recording key information used to help locate missing children quickly and safely; the absence of a fully completed document should not have delayed the police fulfilling its own safeguarding obligations. The Interface Protocol stated that the management of the risk remained with the reporting HSCT *'if the necessary steps [set out in the protocol] have not been taken, including the completion and submission of the Philomena Protocol from (residential care and JCSA [Joint Commissioned Supported Accommodation] only), unless there is an immediate risk to the safety of the child/young person.'* The PSNI Missing Person Investigations Service Instruction stated that the *'Philomena Protocol Form must be fully completed before the PSNI will accept responsibility for the missing child from another statutory agency.'* The HSCT was expected to demonstrate due diligence in attempting to locate the child. The Service Instruction did provide for an overriding principle to be applied by call handlers who received missing persons reports to progress the missing person report to the next stage where another statutory agency had not completed their associated due diligence checks, but had informed police of a real and immediate serious concern for that person's life (that is, that the risk will be high). It was the interpretation of real and immediate risk in the context of vulnerable children going missing from residential care which was of concern to Inspectors. In placing too much emphasis on a 'threat to life' when assessing missing incidents as high risk, the PSNI was not sufficiently considering how other vulnerabilities, such as the risk of exploitation, were affecting the risk to children including those who had already been deemed to have experienced or were at risk of child sexual exploitation.
- 3.49 Data provided by the PSNI for the last five financial years (2020-21 to 2024-25) showed that on average a quarter of children who were assessed as at risk of child sexual exploitation at the time they were reported missing were assessed as high risk meaning: *'The risk of harm is assessed as real and immediate and there are substantial grounds for believing that the subject is in danger through their own vulnerability or ill health; or may have been the victim of a serious crime involving*

42 PSNI, HSC Trusts, *Interface protocol between HSC Trusts and PSNI, September 2024* available at https://www.psnipolice.uk/sites/default/files/2025-01/HSC%20-%20PSNI%20Joint%20Protocol%20on%20Missing%20Children%20Sept%2024%20Final_0.pdf

43 The PSNI define the Philomena Protocol as a national scheme that encouraged agencies, carers, guardians, families and friends to record vital information which could be used in the event of a vulnerable child or young person going missing. Under its Interface Protocol with HSCTs in Northern Ireland, the Philomena Protocol was to be completed by the child's field social worker for all children entering residential care and maintained as a live document which could be provided to the PSNI when a child was reported missing from residential children's homes and supported accommodation.

a real and immediate threat of harm; or the risk posed is immediate and there are substantial grounds for believing that the public is in real and immediate danger. (PSNI Risk Definition Service Instruction Missing Persons Investigations).' The majority were assessed as medium risk, that is: *'The risk of harm is assessed as likely to place the subject in material danger to their life or safety or they are a significant threat to themselves or others.'* A medium risk response required an active and measured response by police and other agencies and was assigned to a Local Policing Team Constable to investigate, whereas a high-risk case required the immediate deployment of resources and the investigation was allocated to a District Inspector. The highest proportion assessed as high risk was in 2021-22 (39%) and the lowest was in 2023-24 at 11%. Overall children flagged as at risk of child sexual exploitation accounted for 4% of all missing children reports which had remained relatively static over the past five financial years.

- 3.50 An important purpose of the Philomena Protocol was to reduce unnecessary police contact when, for example, a child was late home, testing boundaries or failed to inform their carer where they were. It should not be used as a tool to manage the deployment of resources by any agency.

CASE STUDY 5

A 17-year-old girl known to be at risk of child sexual exploitation was reported missing. The initial call from the children's home reported the child as a concern for safety. There was concern that the child could be under the influence of drink or drugs.

Positively in this instance the PSNI recorded the child as missing. However, the risk was graded as medium. The PSNI's Public Protection Branch had provided fast track actions but it was not clear how this influenced the risk assessment or outcome. Supervisor reviews maintained the risk rating at medium until a further review almost three days later when the risk rating was changed to high. The child returned a day later. The rationale for changing the risk to high was that the child had then been missing for three days and while there had been multiple entries recorded in the intervening period on the police information system they offered very little by way of lines of enquiry.

Some time after the initial report, information was provided that the child had left the children's home with two unknown males.

Inspectors considered that this investigation was not progressed with sufficient urgency given the risk factors to the child and in light of information that became available later in the investigation. Potentially if the call had been graded high sooner, the child might have been located sooner.

The use of victim blaming language demonstrated a lack of understanding of the nature of exploitation and risks of harm to his child. This included references to the child having been missing 40 times 'already' this year and turning up in many different locations and being a 'very resourceful lady.' Assessments were made about her risk in relation to her age and because she sounded coherent on a phone call, no new concerns had been raised.

The record of the return home interview recorded concerning information including that the child had 'went off' with 'two gentlemen'. It further recorded she had gotten away and returned.

The child was subsequently taken to hospital for examination and an investigation of sexual abuse was pursued by the PSNI's Public Protection Branch.

- 3.51 Inspectors considered the use of the language around management and point of transfer of risk from one statutory body to the other as set out in the Interface Protocol and PSNI Service Instruction was inappropriate. Rather a focus on responding in the best interests of the child to protect them from harm was required.
- 3.52 Also of note was that the Philomena Protocol template adopted for use in Northern Ireland asked a specific question as to whether the person was formally assessed as at risk of child sexual exploitation whereas the National Police Chief's Council form asked about a wider number of indications of exploitation including Modern Slavery and Human Trafficking, County Lines⁴⁴, other forms of child criminal exploitation and if the child was displaying harmful sexual behaviour. The consideration of any form of child exploitation was required to inform risk assessment and operational responses to protect children from harm.

OPERATIONAL RECOMMENDATION 1

Within three months of the publication of this report, the Police Service of Northern Ireland should, in conjunction with statutory partners, include other forms of child exploitation in the Philomena Protocol form so that a fuller picture of the risk of harm to the child informs its assessment of risk and response when children are reported missing.

- 3.53 The Joint Interface Protocol and the PSNI's Missing Person Service Instruction provided guidance on the purpose and importance of safe and well checks after a missing person had been located. However important information from safe and well checks and return home interviews was not consistently recorded in police records meaning the opportunity to escalate responses and hear the voice

⁴⁴ County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'.

of the child, were being missed. Frontline Police Officers also explained that, with current resourcing, they were often tasked to respond to other calls when on their way to complete safe and well checks with children. The completion of safe and well checks was further exacerbated in instances where missing episodes were recorded as concerns for safety which meant that repeat missing flags were not being generated. In one case of a 17-year-old girl, Inspectors saw records related to 133 missing episodes yet this child had not been flagged as repeat missing. The outcome of check-ins with children on their return to their accommodation were not routinely evidenced in police records. Understanding the reasons why a child went missing was important to help reduce future missing episodes and or provide information that may assist finding them safely and quickly should they go missing again.

- 3.54 It was unclear from police records if referrals were routinely being made by the police to HSCTs when a child was missing or returned following a missing episode and therefore important information about vulnerable children was being missed by partners. In the case file review, there was no evidence of Form 0⁴⁵ referrals being made in cases where children were missing from care and in other circumstances, Inspectors did not see the outcome of these referrals or of joint agency safeguarding meetings recorded in police records. The PSNI advised that the Form 0 referral was a notification system that was not completed when children were reported missing from care and where a response was required for an ongoing incident, direct contact would be made with children's Social Services. Inspectors did not see evidence of this in the cases reviewed. In cases where children were missing from care it was important, as with the outcome of safe and well checks and return home interviews, that any intelligence or information that helped support the child and reduce the likelihood of them being missing or being found more quickly was captured. This was important as it assisted with care planning to protect and mitigate risks to the child. Trigger plans⁴⁶ were not routinely completed.
- 3.55 A review of minutes of strategic and operational discussions between HSCTs and the PSNI did not provide assurance that the partnership between HSCTs and the PSNI was operating effectively and in a child focused way. This was further supported in accounts from Police Officers who attended these meetings. Accounts described to Inspectors were that interactions with HSCT staff were tense, fractious and frosty which was not conducive to a good collaborative working environment. It was clear from discussions with frontline Police Officers in particular that there was not a mutual understanding of each other's roles and

45 A Form 0, A Statutory Agency Information Exchange Form, is a document used by Police Officers to report incidents or provide information with another statutory agency, in this instance HSCTs. It can also be used to request information from HSCTs about families and children,

46 The College of Policing guidance on trigger plans is that where it is assessed that an individual is at risk of going missing again the police officer in charge of the investigation should ensure that information gathered is recorded to assist in creating a plan outlining key actions to be taken if the person is subsequently reported missing. This 'trigger plan' may then be used to locate them as quickly as possible and ensure relevant partners are informed of the incident. Trigger plans should be reviewed following the conclusion of any subsequent missing incidents and should be shared with other police forces if the individual moves to another area.

responsibilities in relation to missing children. There was little evidence in minutes of operational meetings as to specific contributions from, and actions for, policing and little sense of collaborative planning at operational or strategic level to prevent missing episodes. There were, however, examples of close, collaborative working in different Policing Districts and in response to significant events.

- 3.56 Monitoring the effectiveness of the PSNI's response to missing children was lacking with insufficient analysis and understanding evident of the links between missing children and risks of exploitation – both sexual and criminal. Public Protection Branch monitored the numbers of reports of missing children and repeat missing children at its internal Child at Risk management meetings. Minutes of these meetings noted changes in quantitative data but there was not evidence of analysis and understanding of what accounted for increases or decreases in the number of missing and repeat missing reports and what was driving this. The fact that missing episodes were being reported as Concerns for Safety rather than Missing Children Reports also meant the scale of this issue was not fully visible. In one meeting (in September 2024) following consideration of an internal audit review of missing persons, an agreed action was that a District Commanders' meeting was to be reinstated which was regarded as a valuable opportunity to increase awareness. This had happened. Consideration was also given to holding a conference to aid understanding of missing person's process and protocols. It was evident that some learning had been identified from visits to other jurisdictions. Such meetings could benefit from a more holistic approach to addressing risks presented to children and more meaningful analysis and monitoring of who was at risk and why. This was important for identification and prioritising how police might better deploy scarce resources to target groups or areas at risk of highest harm.
- 3.57 CJI's 2020 Child Sexual Exploitation Inspection had previously identified Areas for Improvement related to missing children. In April 2025, following the completion of the PSNI case audits, CJI's Chief Inspector wrote to the Chief Constable to bring the initial findings to his attention and asked that immediate action was taken to review current practice to provide assurance that the risks of harm to children were being properly assessed, recorded and responded to and that robust child safeguarding practices were in place.
- 3.58 In response the Chief Constable provided a position paper setting out work that was being undertaken to address the matters outlined. He acknowledged that there was room for improvement in the PSNI's response to child criminal and sexual exploitation and how missing children and concerns for safety were classified, escalated and jointly managed.

OPERATIONAL RECOMMENDATION 2

The Police Service of Northern Ireland should immediately improve its response to missing children and be able to demonstrate an improved understanding of the relationship between forms of child exploitation and missing children reports. This should include a robust process of monitoring and quality assuring reports for missing children, and effective child-centred arrangements with strategic partners to reduce the number of children who go missing.

Prosecution

- 3.59 Stakeholders reflected that the PPS adopted a child-centred approach and focused on the best interests of children and young people in their decision-making.
- 3.60 Eleven cases were examined by Inspectors which involved 22 children (21 male and one female) and two adult cases. As has been stated, the PPS did not have a child criminal exploitation marker on its system from which cases involving or potentially involving child criminal exploitation could be extracted. Instead, Inspectors tracked a number of cases from the PSNI case audit where files had been referred to the PPS. The small number of cases examined and the fact that a full file had not yet been submitted in all cases limited the findings. Nonetheless Inspectors made a number of important observations.
- 3.61 There was no reference in any of the Structured Outline of Case or Prosecutor Information Forms reviewed to child criminal exploitation. Although there were strategic conversations between the PSNI and Prosecutors about the handling of public disorder cases in these and for the other case types, there was no evidence of conversations taking place between Police Officers and Prosecutors at an individual level as to whether a child was to be treated as a victim or suspect. In public order cases there was a generic statement provided by a PSNI Silver Commander about the context of the disorder but there were no case specific details recorded in the documents provided by the police to indicate that exploitation was a specific consideration. In all cases children were treated as suspects. Inspectors considered that there was potential for child criminal exploitation to be considered in at least three cases. There was no indication of connections being made to previous cases involving the same child or with cases involving potential perpetrators of exploitation. Each case appeared to be dealt with as a separate prosecution. While Decision Information Requests had been made in a few cases these related to the availability of evidence rather than curiosity or exploration of child criminal exploitation concerns. Decision-making rationale was not sufficiently well recorded in most of the cases examined bar in two cases. However, in one case there was a good file record of the problems with a protective Form 1 summons⁴⁷ and in another involving multiple defendants a good rationale had been recorded for a no prosecution, prosecution and youth conference plan decision.

⁴⁷ The term 'protective Form 1 summons' refers to a specific type of legal document used in Northern Ireland to initiate prosecution for a summary-only offence that is nearing its statute-barred date (the legal time limit for starting a prosecution).

- 3.62 There was no evidence of special measures or use of Registered Intermediaries. Three cases referred to the use of an Appropriate Adult where Inspectors would question the suitability of that person to act as the Appropriate Adult. No safeguarding enquiries were raised by Prosecutors in these cases. There was no evidence of efforts made to speak to the child with an independent adult to explore the circumstances of the offence. In all cases Inspectors considered the voice of the child and communication/consultation with the child and parent, if appropriate, was absent. Prosecutors were not always complying with their obligation to flag safeguarding concerns to the police around the potential for child criminal exploitation.
- 3.63 While Prosecutors interviewed were generally satisfied that current guidance and policies enabled them to take account of child criminal exploitation, Inspectors did not see evidence in the cases examined of how risks around child criminal exploitation had informed Prosecutors' decision-making. Inspectors understood the PPS planned to consider how its existing guidance might be updated once a system wide approach had been developed, it would be helpful to see some earlier adoption of similar processes set out in its child sexual exploitation guidance which, for example required Prosecutors to seek information from PSNI Investigating Officers where there was a question around the potential for child criminal exploitation. This was important to ensure that the best interests of the child were considered.
- 3.64 A number of Prosecutors expressed a view that proving exploitation would be difficult which indicated the need for an integrated criminal justice wide response to map approaches, offences and use of defences.

Youth Justice Agency

- 3.65 YJA staff were increasingly aware of the criminal exploitation of children. This tended to emerge in the course of their engagement with children either within the custodial or community services teams. Inspectors saw a few examples of cases where YJA staff had brought concerns about child criminal exploitation to the attention of the police. However, YJA's involvement was often at the end of a criminal justice disposal and opportunities for earlier engagement to provide information that could influence whether a charge or prosecution was pursued were currently limited.

CASE STUDY 6

A 13-year-old girl was first reported for theft of items purchased with stolen cash and cards at two stores. There were references in the police records to the child being 'used' but this was not explored during the police interview or why a child would buy the items purchased. It was further documented that the child was apologetic and made full admissions. The PSNI initially omitted to make a referral to Social Services and the child was given a Diversionary Youth Conference for this offence.

After the initial incident, in the following 16 months there were a further 12 thefts and one fraud occurrence recorded on police systems for the same child. In these reports the circumstances also indicated the child was with adults at the time the offences were committed and a close relative continued to act as her Appropriate Adult at police interview and youth conferences.

In the last theft, the Youth Diversion Officer recorded that the child was now beyond diversionary measures culminating in a decision for prosecution.

The Prosecutor did not make any enquiries around child criminal exploitation concerns despite the circumstances of the offending being outlined in the Prosecutor Information Form. There was no evidence of efforts being made to speak with the child with an independent Appropriate Adult to explore her circumstances.

The case highlights the need for Police Officers and Prosecutors to be alert to child criminal exploitation and exercise professional curiosity as to the circumstances of the incident. This child was treated as a suspect in each case. Timely safeguarding referrals were not made. Early identification of child criminal exploitation risks may have prevented this child being drawn into the criminal justice system.

SAFEGUARDING VICTIMS AND SURVIVORS

- 3.66 The file sample evidenced that there did not appear to be a child-centred approach to informing police investigative action; children were viewed as suspects. Reports of concern to children's Social Services were not always made in a timely way and there was very limited evidence of the outcomes of these reports in police records. In the cases examined by Inspectors there was no consideration of the NRM and the safeguards it could potentially provide to children.
- 3.67 The following case study was provided by Streets of Growth, a youth intervention service based in East London gives an example of how the NRM can be used to support victims of exploitation.

CASE STUDY 7

Tom (aged 17) was referred to the Streets of Growth youth intervention service by children's social care at the end of last year. His social worker was concerned about risks outside the home. Tom was assigned an Intervention Coach who began working with him to develop a bespoke intervention plan. The team performed targeted street work in Tom's estate to map the risk he was exposed to, and to understand the peer and community networks around him. Tom had previously been arrested for possession with intent to supply class A drugs. Streets of Growth was already working with some of the friends charged alongside him. It was difficult to engage Tom, but consistent outreach over weeks and months saw his Intervention Coach gradually establish a relationship with him. Tom is from an impoverished background and has grown up witnessing domestic violence among his parents. His community is known for knife crime and drug supply, with high rates of crack, cocaine and opioid addiction. For Streets of Growth staff, all these factors represent contextual considerations behind why our early efforts to engage Tom were difficult.

Grooming and criminal exploitation

Through this mapping, Tom's Intervention Coach identified signs of criminal exploitation. Tom's mother described how he would sometimes take calls and urgently have to leave home. He sometimes wore expensive high fashion clothing. He had been beaten up by a group of peers in the first weeks of our interactions with him. Some of his friends were older than him (early 20s). In exploring the aftermath of Tom's first arrest for Possession with Intent to Supply, concerns were raised around potential debt bondage related to the drugs seized by police. Tom denied that this was the case.

More recently, Tom's family home was raided, and the police seized a further large quantity of class A drugs. Moving in on this reachable moment, Tom finally shared with his Intervention Coach that he was under pressure to store drugs in his home and had been in ever-spiralling debt bondage since his first charge. Tom's Intervention Coach wrote a joint statement with him on the history of his relationships with adults in the community, beginning with the day he was first introduced to drugs. There were substantive signs of grooming and coercion throughout Tom's developmental years that he had not identified as exploitative but rather described as 'normal'. In partnership with his legal representative, the NRM was initiated through a charity recognised as a first responder. Tom's statement, and one provided by his Intervention Coach, was submitted to the NRM process. No names of perpetrators or other potential identifiers were provided in this evidence due to fears for Tom's safety.

Our partnerships with the Metropolitan Police Service allowed us to update them throughout this process and they expressed faith in our assessment of the situation based on previous experience with our service. Court proceedings related to Tom's charges have been placed on hold pending the outcome of the NRM process. Having already received a Reasonable Grounds Decision from the Single Competent Authority;

it is expected that a Conclusive Grounds Decision will be granted. Although not guaranteed, it is expected that when Tom's legal representative informs the court of the NRM decision and the intention to make use of a statutory modern slavery defence, charges will be withdrawn. This is bolstered again by our partners within the police who had already begun to raise concerns around criminal exploitation in the immediate aftermath of Tom's arrest.

Moving forward

Tom remains on a bespoke intervention plan, and we will continue our work with him for up to two years into adulthood. During this time, he will retain contact with his Intervention Coach as he progresses through our stage-based model, eventually transitioning to be supported by our employability staff. Safeguarding measures have already been put in place for Tom and work is ongoing within his community through continuous targeted street-based interventions. Streets of Growth's previous experiences of utilising the NRM have shown that refraining from criminalisation in these contexts can lead to more positive outcomes. This allows us to continue supporting children and young people outside of the barriers put in place by offenderisation.

Not only does this case study demonstrate how a NRM can help, but it also powerfully demonstrates a child first and collaborative approach wrapped around a child by both the voluntary and statutory sectors.

Case study provided by Streets of Growth

- 3.68 Through its Strategic Partnerships and Prevention Branch, the PSNI delivered multiple EPPOC funded schemes and initiatives aimed at preventing children becoming involved in paramilitary groups and offending. Some of the initiatives had been particularly effective in taking children away from flashpoints at contentious times of the year. Uptake of this funding had reduced in part due to pressures on resourcing of Neighbourhood Policing Teams and questions about how effectively children at risk of child criminal exploitation were targeted.
- 3.69 Overwhelming internal and externally conducted evaluations reported improved awareness and better relationships between children and communities in which the schemes operated and the police. A number were also able to demonstrate a reduction in anti-social behaviour in pilot areas and reductions in calls for service during the period of the programme.
- 3.70 Based on the police evaluations reviewed during the inspection it was difficult to gauge the overall effectiveness of prevention programmes in terms of safeguarding children and reducing their risk of exploitation over the longer term.
- 3.71 A good example of multi-agency working to safeguard children and their families was work led by the Western HSCT Family Interventions Support Team, supported by the PSNI and other agencies, to prevent vulnerable children and their families being drawn into public disorder.

PROFESSIONAL AND PUBLIC AWARENESS OF CHILD CRIMINAL EXPLOITATION

- 3.72 There was widespread agreement of the need for greater professional awareness of child criminal exploitation by those working in the justice sector and among stakeholders. Raising knowledge and awareness was a strand of the cross-Departmental action plan. Training for frontline practitioners and developing and implementing a public information and awareness raising programme to support young people and their families and carers were elements of the work being taken forward by the SBNI and the Children and Young Persons Strategy Child Protection Group.
- 3.73 Research had demonstrated a lack of recognition of child criminal exploitation among children⁴⁸ and the need to consider the community control dimension of paramilitarism in terms of the understanding of and identification of child exploitation.⁴⁹ It was generally understood in discussions with stakeholders and criminal justice agency staff that many children did not self-identify as being victims of exploitation.
- 3.74 The EPPOC's *Ending the Harm* campaign launched in October 2024 aimed to raise awareness about the impact caused by paramilitaries in Northern Ireland. The campaign featured several strong messages including how the role of paramilitary gangs abuse and control women and girls, groom children and force them into violence to sell drugs and steal their childhoods and control their community.
- 3.75 Tracking research conducted in December 2024 found that:
- 89% of respondents fully supported what the campaign was saying and trying to do;
 - 63% agreed with the statement that paramilitary gangs forced children into violence, stealing their future;
 - 59% agreed that gangs groomed children to force them to sell drugs; and
 - 69% of respondents stated that they agreed that paramilitary gangs exploited women and girls.
- 3.76 The 'hard-hitting' posters were supported by videos illustrating the harm caused by child exploitation.

48 Walsh, C. *From contextual to criminal harm: Young people's perceptions and experiences of child criminal exploitation (CHILD CRIMINAL EXPLOITATION) in Northern Ireland. Department of Justice (Northern Ireland), 2023* available at <https://www.endingtheharm.com/research-papers/from-contextual-to-criminal-harm/>.

49 Swaine, Aisling. 'When you know what they are capable of': Paramilitary-related Gendered Coercive Control' Research Report, Foyle Family Justice centre, University College Dublin, 2024 available at https://foylefamilyjusticecentre.org/app/uploads/2024/09/Full-Report_Para-Coer-Control_Swaine-FWA.pdf.

- 3.77 The campaign had generated some mixed responses and was solely focused on the role of paramilitary gangs. It was also important that professionals and the public tuned into wider forms of child exploitation including children being exploited by close or wider family. Stakeholders and a number of frontline operational staff reflected that there was a gap in addressing the perceptions of children and their parents/carers that there was a lack of consequences for children who offended.
- 3.78 PSNI public statements following disorder in 2024 which called out the exploitation of children as child abuse was widely recognised and supported. Through a series of strategic communication engagement events, media campaigns, policing operations and direct engagement with community leaders and groups, the PSNI responded to concerns raised by communities about the pursuit and disruption of those who exploited children and raised awareness of and the need to report concerns. Recent campaigns highlighting drugs, illegal money lending and modern slavery and human trafficking were examples of this. Child criminal exploitation and use of the NRM were discussed at the PSNI Chaired Youth Champions Forum. Members provided positive feedback and exchange of information at Forum meetings which had led to changes to operational policing for children.
- 3.79 The SBNI had published helpful resources to assist raising awareness of child criminal exploitation and provide guidance for professionals. This included a short leaflet for practitioners setting out the definition of child criminal exploitation, signs and indicators and what practitioners could do to help a child who was being exploited. Useful practical examples were included about different forms of child criminal exploitation which included quotes from research conducted with young people of their experience of child criminal exploitation. A recently published guide⁵⁰ on appropriate language to use in relation to child sexual and/or criminal exploitation was a valuable resource.
- 3.80 A HMICFRS report⁵¹ published in July 2025 recognised the important role Neighbourhood Policing Teams played in building trust and confidence with young people to divert them away from paramilitary groups and offending behaviour. However, Inspectors also noted that reduced Neighbourhood Policing Team staffing levels were impacting on community engagement and preventive work. CJI endorsed the Area for Improvement made in the HMICFRS report for the PSNI to ensure that neighbourhood officers were not diverted from their main duties. The same issues had been identified in CJI's March 2024 inspection of Community Safety and Local Policing Arrangements⁵² which made one Strategic and eight Operational Recommendations for improvement.

50 SBNI, *Appropriate Language: Child Sexual and/or Criminal Exploitation, Guidance for Professionals, July 2025* available at <https://www.safeguardingni.org/sites/default/files/2025-07/Victim%20blaming%20language%20a%20guide%20for%20professionals.pdf>.

51 HMICFRS, *The Police Service of Northern Ireland: An Inspection of Police Effectiveness and Efficiency, April 2025* available at <https://hmicfrs.justiceinspectorates.gov.uk/publication-html/psni-inspection-of-police-effectiveness-and-efficiency-2025/>.

52 CJI, *An Inspection of Community Safety and Local Policing Arrangements in Northern Ireland, March 2024* available at <https://www.cjini.org/wp-content/uploads/2024/03/Community-Safety-Local-Policing-Report-Tagged.pdf>.

CHAPTER 4: **OUTCOMES**

- 4.1 Evolving international approaches to evaluating outcomes for children at risk of exploitation had seen a shift from specific issue/population considerations towards more holistic, comprehensive approaches. Common evaluation themes focused on multi-agency collaboration, child-centred approaches, data driven decision-making and trauma informed practice.
- 4.2 There were no criminal justice system wide outcome measures against which to baseline and monitor the effectiveness of individual and collective criminal justice organisation responses to child criminal exploitation in Northern Ireland. As well as a mechanism to measure justice outcomes a cross-Departmental approach was required to fully understand the nature and scale of child exploitation. Data on the prevalence of child criminal exploitation among particular groups of children, particular locations and as children transition to adulthood was not available.
- 4.3 Based on the evidence considered during this Inspection and the findings from the sampled cases, Inspectors concluded that outcomes for children who were at risk of or who were being criminally exploited were not good. Opportunities to identify child criminal exploitation had been missed, safeguarding responses were not evident and neither was evidence to indicate how perpetrators were being pursued and disrupted. Understanding of the relationship between child criminal and sexual exploitation when children are missing from residential care was not adequate.
- 4.4 CJl's Child Sexual Exploitation Inspection Report had identified that understanding the numbers of children protected and offenders disrupted and prosecuted was crucial to assessing how many children had been helped because of activity to deal with child sexual exploitation. Strategic Recommendation 2 recommended the development of a comprehensive problem profile which included collation of data related to risk of child sexual exploitation and metrics around the number of children and parents/carers helped, police investigations and offenders disrupted and prosecuted.
- 4.5 The 2025 Child Sexual Exploitation Follow-Up Review report recognised progress made to address Strategic Recommendation 2 but key gaps remained due to a lack of available or reliable data. This included the provision of greater data from HSCT and education partners; evidence demonstrating how children and their families/carers had been supported, uptake of the NRM, the number of offenders disrupted and prosecuted specifically related to child sexual exploitation offences was not available and how the voice of the child had been considered.

- 4.6 While this recommendation had focused on child sexual exploitation, the principles and learning were also applicable to child criminal exploitation and should be considered under the child criminal exploitation data development action in the cross-Departmental action plan.
- 4.7 Data development was an action in the cross-Departmental action plan. Work undertaken to date had focused on mapping out data indicators rather than a comprehensive framework for assessing the effectiveness of the justice and wider responses.
- 4.8 There was an opportunity to build on the learning from developing the child sexual exploitation problem file to address gaps.
- 4.9 There was an opportunity for justice organisations, particularly in light of the proposed introduction of a new child criminal exploitation offence and others aimed at tackling organised crime, as well as the outworkings of the DoJ-led devolved NRM pilot, to draw together a range of outcome measures across the justice sector to establish a baseline against which progress could be measured and ultimately, how many children had been helped.
- 4.10 For the first time the Northern Ireland Policing Plan included an indicator specifically for PSNI effectiveness in tackling child criminal exploitation. This required the PSNI to report on the delivery of relevant aspects of its Children and Young Person Strategy, activities, and impact to support victims of child criminal and sexual exploitation.
- 4.11 The PSNI recognised the need to build on its current reporting data to extend the range of quantitative and qualitative data it used to assess its performance in response to children as victims, suspects and witnesses. Currently high-level data was reviewed at Public Protection Branch performance meetings but there was limited interrogation of trend and patterns to examine gaps, risks and what was working well. A challenge for the PSNI was that responsibility of different strands of its work with children and young people sat in different operational areas. Reporting against the Policing Plan indicators had presented an opportunity to revisit this but also consider the range of data it used to give an insight to its performance. It was positive that a new forum had been established to draw on the expertise and knowledge from different disciplines across policing. This recognised that the PSNI's response to tackling child criminal exploitation cut across many aspects of Local, Neighbourhood and specialist policing Teams.
- 4.12 The Seventh Report of the Independent Reporting Commission⁵³ reported that EPPOC was having a tangible effect in communities where paramilitaries operated. Young people reported a positive effect on their lives and prospects because of participation in EPPOC funded initiatives.

53 *Independent Reporting Commission, Seventh Report, HC704, February 2025* available at <https://www.ircommission.org/files/ircommission/2025-02/IRC%20Seventh%20Report.pdf>

- 4.13 CJI’s 2024 inspection of the YJA’s Youth Interventions⁵⁴ noted the existence of a broad range of official statistics, performance management information and research related to youth justice. However, analysis of the different data sets and implications for the child justice system was not evident and a drive to enhance Section 75 (of the Northern Ireland Act 1998) data monitoring and analysis was an area for improvement. Parts of systems were measured but not joined up to understand what influenced children’s outcomes. While there was a solid evidence base to show that the numbers of children entering the youth justice system for the first time had reduced, solutions were needed to improve outcomes for children most at risk of repeated justice involvement and to enhance support where high levels of adversity and trauma had been experienced.
- 4.14 Understanding the extent to which child exploitation was a factor in the number of children coming into the system and those who were at risk of repeated justice involvement was an important consideration when developing a justice outcomes framework as envisaged under Strategic Recommendation 1.

54 CJI, *Youth Interventions: An Inspection of the Youth Justice Agency’s community Interventions, September 2024* available at <https://www.cjini.org/wp-content/uploads/2025/05/Youth-Interventions-Inspection-Report-TAGGED.pdf>

APPENDIX 1: TERMS OF REFERENCE

AN INSPECTION OF CHILD CRIMINAL EXPLOITATION IN NORTHERN IRELAND

Introduction

Criminal Justice Inspection Northern Ireland (CJI) proposes to undertake an inspection of how the criminal justice system recognises, assesses and responds to child criminal exploitation in Northern Ireland.

How the Police Service of Northern Ireland (PSNI) deals with child criminal exploitation will be the primary focus of the inspection but the response of other justice organisations including the Public Prosecution Service for Northern Ireland (PPS), Northern Ireland Courts and Tribunals Service (NICTS), the Probation Board for Northern Ireland (PBNI) and the Youth Justice Agency (YJA) will also be examined from the perspective of how child criminal exploitation is emerging in their work.

CJI is also conducting a Follow-Up Review of its 2020 inspection of how the criminal justice system dealt with Child Sexual Exploitation and recognises the potential overlap with this work. As far as possible Inspectors will aim to avoid duplication to optimise self-assessment responses, stakeholder engagement and other fieldwork where feasible.

CJI will be supported by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services' (HMICFRS) Inspectors to undertake this Inspection.

Context

Public disorder events in Northern Ireland during 2024 reportedly involving children as young as six and seven-years-old drew widespread attention to the issue of child criminal exploitation in Northern Ireland. At the time PSNI senior leaders were clear that children were being criminally exploited and that the police were aware of individuals associated with paramilitarism potentially being involved.

The Child Protection Senior Officials Group (CPSOG) provides cross-Departmental strategic direction on existing and emerging child protection issues in Northern Ireland. CPSOG is chaired by the Department of Health (DoH) and the Department of Justice (DoJ) is a core member of the Group. In 2023, CPSOG agreed a two-year action plan to create a co-ordinated, system-wide response to child criminal exploitation. This plan⁵⁵ was jointly launched by the Ministers for Justice, Health and Education on 30 September 2024.

55 DoJ, *Child criminal exploitation Action Plan, September 2024* available at <https://www.justice-ni.gov.uk/publications/child-criminal-exploitation-action-plan>.

An agreed definition of child criminal exploitation was published on the same date which was: *'Child criminal exploitation is a form of child abuse which occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity. The exploitation may be through violence or the threat of violence but may also appear to be transactional and in the context of perceived relationships and friendships. The victim may have been criminally exploited even if the activity appears to be consensual. Child criminal exploitation does not always involve physical contact. It can also occur through the use of technology and social media. The criminal exploitation of children and young people can include being exploited into storing drugs or weapons, drug dealing, theft, violence, intimidation, vandalism, forced labour and other forms of criminality through grooming by people that children and young people trust or look up to.'*

The DoJ's Modern Slavery, Human Trafficking and Child Exploitation Branch within Safer Communities Directorate lead its work on child criminal exploitation.

The development of the action plan was informed by a Northern Ireland Commissioner for Children and Young People (NICCY) advice paper (2021), produced in response to disorder involving young people at that time, which called for a 'unified strategic approach to protect children from harm including abuse, violence, coercion and exploitation by organised gangs and groups.' The Commissioner urged that the response be embedded in safeguarding and children in need processes.

The plan also built on the work of the Executive Programme on Paramilitarism and Organised Crime (EPPOC), which had undertaken a range of work to develop an evidence-based understanding and service provision for young people at risk of, and experiencing, child criminal exploitation. This included funding research⁵⁶ of young people's perceptions and experiences of child criminal exploitation in Northern Ireland.

Following a 22-month inquiry the Northern Ireland Affairs Committee published its report⁵⁷ ('the Report') of the effect of paramilitary and organised crime on society in Northern Ireland in February 2024. One of the recommendations related to the exploitation of children and referenced that an assessment of the extent to which the PSNI and other crime agencies currently utilised powers contained in the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 ('the Act') should be included in an audit of the extent to which the Northern Ireland framework for safeguarding children and young people protected those abused by paramilitary and organised gangs. In its response⁵⁸ to the Report the United Kingdom Government

56 Walsh, C (2023), *From contextual to criminal harm: Young people's perceptions and experiences of child criminal exploitation in Northern Ireland* available at <https://www.endingtheharm.com/research-papers/from-contextual-to-criminal-harm/>.

57 House of Commons Northern Ireland Affairs Committee, *The Effect of Paramilitary Activity and Organised Crime on Society in Northern Ireland, Second Report of Session 2023-2024, HC 43 1 February 2024* available at <https://committees.parliament.uk/publications/43124/documents/214542/default/>

58 House of Commons Northern Ireland Affairs Committee, *The Effect of Paramilitary Activity and Organised Crime on Society in Northern Ireland: Government response to the Committee's Second report, HC 809 23 May 2024* available at <https://committees.parliament.uk/publications/44931/documents/222934/default/>.

(‘Government’) acknowledged the importance of this and noted this was a policy area that had been devolved to the Northern Ireland Executive. The Government referenced that the child criminal exploitation Action Plan included, in line with a then draft modern slavery and human trafficking strategy, provision to increase awareness of offences in the Act as they related to children. An updated DoJ Modern Slavery and Human Trafficking Strategy 2024-27⁵⁹ was published in July 2024 and included objectives to increase public awareness of modern slavery and human trafficking in Northern Ireland.

This is the first CJI inspection with a specific focus on child criminal exploitation although it has emerged as an issue in other inspection activity including during inspections of Modern Slavery and Human Trafficking⁶⁰ and of the work of the Youth Justice Agency. This inspection will draw on the strengths and areas for improvement identified in CJI’s inspections of Child Sexual Exploitation (June 2020)⁶¹ and a pilot Joint Inspection of Child Protection Arrangements,⁶² carried out in partnership with the Regulation and Quality Improvement Authority (RQIA) and the Education and Training Inspectorate (ETI) and published in June 2023. CJI’s inspection of child sexual exploitation made two Strategic and seven Operational Recommendations for improvement which included the development of a cross-Departmental strategic response to tackle child sexual abuse and exploitation and the production of a comprehensive child sexual exploitation problem profile so that the scale and nature of child sexual exploitation was properly understood. Other recommendations focused on approaches, policies and procedures related to child sexual exploitation, the completion of a training needs assessment and training delivery plan, quality assurance processes.

During a 2023 HMICFRS inspection of the PSNI’s effectiveness, efficiency, vetting and standards,⁶³ child criminal exploitation was identified as an area for improvement. Inspectors found that the PSNI should improve its understanding of, and response to, child criminal exploitation but unlike child sexual exploitation there was no similar process in terms of dedicated investigation teams or multi-agency work to protect victims of child criminal exploitation. The Northern Ireland Policing Board’s Human Rights Review of Children and Young People and Policing (December 2024)⁶⁴ (‘the Review’) noted that, in response to the issues identified in the HMICFRS report, the PSNI had commissioned an analytical profile of child criminal exploitation in Northern Ireland which should help it gain an insight into the scale of the problem of child criminal exploitation and related

59 DoJ, *Modern Slavery and Human Trafficking Strategy 2024-2027, July 2024* available at <https://www.justice-ni.gov.uk/publications/modern-slavery-and-human-trafficking-strategy-2024-27>.

60 CJI, *Modern Slavery and Human Trafficking, An inspection of how the criminal justice systems deals with modern slavery and human trafficking, October 2020* available at <https://www.cjini.org/TheInspections/Inspection-Reports/2020/October-December/Modern-Slavery>.

61 CJI, *Child Sexual Exploitation in Northern Ireland, An inspection of the criminal justice system response, June 2020* available at <https://www.cjini.org/TheInspections/Inspection-Reports/2020/April-June/Child-Sexual-Exploitation-in-Northern-Ireland>.

62 CJI, *A Pilot Joint Inspection of Child Protection Arrangements in the Southern Health and Social Care Trust Area, June 2023* available at <https://www.cjini.org/TheInspections/Inspection-Reports/2023/Apr-June/First-joint-inspection-of-child-protection-arrange>.

63 CJI, *The Police Service of Northern Ireland: An inspection of police effectiveness, efficiency, vetting and standards* available at <https://hmicfrs.justiceinspectorates.gov.uk/publication-html/psni-inspection-of-police-effectiveness-efficiency-vetting-and-standards/>.

64 Northern Ireland Policing Board, *Human Rights Review of Children and Young People and Policing December 2024* available at <https://www.nipolicingboard.org.uk/publication/human-rights-review-children-and-young-people-and-policing>.

issues, why children were being arrested and gain a better understanding of those children who had become involved in criminal gangs. The Review made a number of recommendations to help inform the PSNI's response to child criminal exploitation and a recommendation about the reporting of the progress and outcome of referrals made to the NRM.⁶⁵

Aims of the Inspection

The broad aims of this Inspection are to:

- examine the effectiveness of child criminal exploitation organisational strategies and partnerships, including the definitions used and approach to prevention and enforcement;
- examine the operational response to child criminal exploitation by criminal justice agencies including how well organisations understand the nature and scale of child criminal exploitation, how effective their responses to child criminal exploitation are and how well victims and survivors and their parents or carers are supported and children safeguarded;
- examine the public awareness raising in educating communities about the signs of exploitation and abuse, the importance of reporting concerns and effective mechanisms to do that; and
- examine and assess the outcomes of strategies and delivery mechanisms for child criminal exploitation against identified targets and expectations.

Other matters of significance as they arise during the inspection will also be considered.

Methodology

The inspection will be based on the CJI Inspection Framework for each inspection that it conducts. The three main elements of the inspection framework are:

- strategy and governance;
- delivery; and
- outcomes.

Constants in each of the three framework elements and throughout each inspection are equality and fairness, together with standards and best practice. The CJI inspection methodology can be found in The Inspection Process on our website.

Design and Planning

Preliminary research

Information and reports were reviewed to inform the scope of the inspection and how it will be conducted.

⁶⁵ The NRM is a framework for identifying and referring potential victims of modern slavery and ensuring they receive appropriate support.

Benchmarking, research and data collection

Academic papers and inspection reports on child exploitation including child criminal exploitation from other jurisdictions were considered as well as other published information and documents.

Contact with agency (ies).

A preliminary round of discussions took place with DoJ and child criminal exploitation leads in criminal justice organisations and representatives of the Safeguarding Board for Northern Ireland. The Terms of Reference for the Inspection will be shared with the DoJ and criminal justice organisations and a copy published on CJI's website.

Delivery

Stakeholder consultation

A range of stakeholders from the statutory and community and voluntary sectors including victim organisations will be consulted and where possible views will be sought on child criminal exploitation as well as progress made to address the recommendations in CJI's 2020 inspection of Child Sexual Exploitation.

Self-assessment

The DoJ and each criminal justice organisation will be invited to nominate an inspection liaison officer to support the Inspection.

The DoJ will be invited to co-ordinate an update on the progress made against the recommendations made in CJI's Child Sexual Exploitation Inspection Report with contributing organisations asked to identify in that response any relevant updates regarding child criminal exploitation. In addition, a separate information request specific to child criminal exploitation will issue to the:

- Police Service of Northern Ireland;
- Public Prosecution Service for Northern Ireland;
- Probation Board for Northern Ireland;
- Northern Ireland Courts and Tribunals Service;
- Northern Ireland Prison Service; and
- the Youth Justice Agency.

Development of fieldwork plan

Fieldwork will be conducted with criminal justice organisations and will include:

- case file audits of a sample of PSNI (supported by Inspectors from HMICFRS) and PPS files;
- interviews and focus groups including with representatives of other criminal justice organisations (for example the DoJ and the Northern Ireland Policing Board); and
- consideration will be given to how CJI will reflect the voices of children with lived experience in this Inspection.

CJI will liaise with inspection liaison officers to plan and schedule the fieldwork within their respective organisations.

Analysis of data

All material and data provided and produced during the Inspection will be analysed and triangulated. A reference group comprising representatives of the Regulation and Quality Improvement Authority, the ETI, HMICFRS and others who provide expertise as appropriate will be consulted to sense check inspection findings.

Initial feedback to agency

Emerging feedback will be provided to each criminal justice organisation involved in the Inspection.

Drafting of report

Following completion of the fieldwork and analysis of data a draft report will be shared with the inspected bodies for factual accuracy check. The Chief Inspector will invite the inspected bodies to complete an action plan within six weeks to address the recommendations and if the plan has been agreed and is available it will be published as part of the final inspection report. The inspection report will be shared, under embargo, in advance of the publication date with the inspected bodies.

Publication and Closure

A report will be sent to the Minister of Justice, or in their absence the Permanent Secretary, for permission to publish. When permission is received the report will be finalised for publication. A press release will be drafted and shared with the inspected agencies prior to publication and release. A publication date will be agreed and the report will be issued.

Indicative Timetable	
Scoping/Research:	August to December 2024
Stakeholder consultation:	January to February 2025
Agency fieldwork:	April to May 2025
Draft Report to agencies:	September/October 2025
Factual accuracy feedback received:	October/November 2025

The above timetable may be impacted by factors outside CJI's control. The inspected organisations will be kept advised of any significant changes to the indicative timetable.

APPENDIX 2: METHODOLOGY

Desktop research and documentary review

Reports, research and other documents (including previous inspection reports) relevant to child exploitation were reviewed. A Terms of Reference was developed and published on the CJI website.

Self-assessment and document review

Rather than complete a self-assessment the DoJ, PSNI, PPS, YJA, PBNI and NICTS were asked to provide information related to their work on child criminal exploitation under the main inspection areas of strategy and governance, delivery and outcomes. Supporting documents and data were provided. These were reviewed in advance of fieldwork and were used to inform the fieldwork plan and interview question sets.

Victims and those at risk of child criminal exploitation

CJI did not speak directly to children at risk of or who had experienced child criminal exploitation. This was for a number of reasons including concern for re-traumatising children, being able to identify children who were at risk and consideration of how well the concept of child criminal exploitation was understood. Research and podcasts reflecting the voices of children was reviewed and referenced in the report. In addition, a wide range of organisations working with children and young people took part in stakeholder discussions and provided insights from children's experiences of child criminal exploitation and engaging with the justice system. Organisations were also invited to provide case studies documenting those experiences.

Stakeholder consultation

Stakeholder consultation covered both child criminal exploitation and child sexual exploitation as the fieldwork for both Inspections was combined. CJI Inspectors met with representatives from the following organisations:

- Barnardo's;
- Department of Education;
- Department of Health;
- Education Authority;
- Include Youth;
- Independent Anti-Slavery Commissioner (Head of Policy and Strategy);
- Independent Reporting Commission;
- International Organisation for Migration;
- Invisible Traffick;
- Law Society of Northern Ireland;

- MACs;
- National Crime Agency;
- National Society for the Prevention of Cruelty to Children;
- NEXUS;
- NIACRO;
- Northern Ireland Commissioner for Children and Young People;
- Northern Ireland Human Rights Commission;
- Northern Ireland Policing Board;
- Queen’s University Belfast – research student;
- Safeguarding Board for Northern Ireland;
- Stop Attacks;
- University of Central Lancashire academic;
- University of Ulster academic; and
- Voice of Young People in Care.

Fieldwork

One-to-one meetings and focus groups with inspected organisations were completed and covered both child criminal exploitation and child sexual exploitation. The majority of these took place with the PSNI and to a lesser extent with the PPS, the YJA and the PBNI. Inspectors also met with representatives of the DoJ and a representative of the Lady Chief Justice’s Office. We were grateful for the time and information staff and leaders gave us.

DoJ

- Executive Programme on Tackling Paramilitarism and Organised Crime; and
- International Criminal Justice Cooperation Unit.

PBNI

- Assistant Director – Public Protection.

PPS

- Assistant Directors, Belfast and Eastern Region;
- Assistant Director, Central Casework;
- Assistant Director, Serious Crime Unit;
- Assistant Director, Western and Southern Region;
- Child criminal exploitation Policy Lead;
- Child sexual exploitation Policy Lead;
- Modern Slavery and Human Trafficking Policy Lead;
- Youth Policy Lead;
- PPS Prosecutors Central Casework;
- PPS Prosecutors Serious Crime Unit;
- PPS Youth Prosecutors, Belfast and Eastern Region;
- PPS Youth Prosecutors, Western and Southern Region; and
- Victim and Witness Care Unit Managers, Belfast and Foyle.

PSNI

- ACC Crime;
- ACC Local Policing and Children's Champion;
- Belfast District and Mid East Antrim (District Commander, Detective Inspector CID, Local Policing Team and Neighbourhood Policing Team Inspector and Sergeants x 2, Constables x 7);
- Contact Management (Chief Inspector, Inspector, Sergeant and Constable);
- College and District Training Leads x 9 (Crime, Foundation, Local area, Student Officer training);
- Community Initiative to Reduce Violence (Detective Superintendent);
- Custody Sergeants x 2 (Musgrave Street and Waterside);
- Derry City and Strabane District (District Commander, Superintendent, Neighbourhood Policing Team and Local Policing Team Sergeants and constables x8);
- Mid and East Antrim District (Sergeant and Juvenile Support Officer);
- Missing persons leads (Detective Superintendent, Inspector, Constable);
- Multi-agency Support Hub Inspectors x 3 and Constable x1 (Belfast/Mid and East Antrim/Fermanagh and Omagh/Derry City and Strabane);
- Organised Crime Branch (Detective Chief Superintendent Organised Crime, Paramilitary Crime Task Force Lead, Modern Slavery and Human Trafficking Lead, Analysts- child criminal exploitation Analytical Report);
- Public Protection Branch (Detective Chief Superintendent, Detective Superintendent Child Abuse Investigation Unit and Chair of the SBNI Child Exploitation Committee, Detective Chief Inspector and Inspector Public Protection Branch, Detective Inspectors CSE x 5, Detective Chief Inspectors CRU x 2 and Adult Safeguarding Lead and staff);
- Reducing Offender Unit Focus Group x 5 (Antrim/Armagh, Banbridge and Craigavon/Belfast/Ballymena);
- Strategic Partnerships and Prevention (Superintendent);
- Terrorist Investigation Unit (Detective Superintendent, Detective Chief Inspector, Detective Inspector TOMU, Detective Sergeant TOMU, Constables x 2); and
- Youth Diversion Officers x 6 (Armagh, Banbridge and Craigavon/Belfast/Causeway Coast and Glens/Derry City and Strabane/Newry, Mourne and Down/Ards and North Down).

Youth Justice Agency

- Director Youth Justice Services Directorate;
- Assistant Director child criminal exploitation Policy Lead;
- Assistant Director Training Lead;
- Deputy Director Juvenile Justice Services;
- Child Exploitation Champions x 6;
- Family Links worker;
- YJS practitioners x7; and
- JJC A/Head of Residential Services and Team Leaders x 2.

File reviews

A review of 34 PSNI files was undertaken with support from Associate Inspectors who work with the HMICFRS vulnerability team with a particular expertise in child protection inspection. As there was no child criminal exploitation flag on the PSNI record management system, CJI Inspectors undertook an initial sift of child custody records (2024) to identify cases for a full audit. Based on research evidence, Inspectors sampled offence types where a risk of child criminal exploitation was more likely to be present including offences related to public disorder, threats to life/damage property, weapons drugs and theft. Files identified from this sift and those drawn from missing children records (July-December 2024), NRM referrals (2022, 2023 and 2024) and threats to life made against children records (2022, 2023 and 2024) were audited. A further two files which the YJA brought to the attention of Inspectors were included in the audit.

In total nine cases related to public disorder/riot, six drugs, three theft, nine missing children, five threat to life cases and the two YJA referred records were reviewed. Four NRM referral records were examined.

A total of 12 PPS files were reviewed. These were identified from our review of the PSNI files.



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