

Mark Burns-Williamson OBE Police and Crime Commissioner for West Yorkshire Ploughland House 62 George Street Wakefield WF1 1DL



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Your Reference:

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Dear Home Secretary

HMICFRS Inspection Report – Country Lines Drug Offending

I am writing in response to the recent HMICFRS inspection report on the police and National Crime Agency's action against County Lines drug offending. Although this report does not specifically mention West Yorkshire, the topic is a relevant one to this area, with Leeds, Bradford, and Kirklees the source of drug-exporting lines to adjacent Yorkshire counties and beyond.

Tackling County Lines is one aspect of the wider work being carried out by the police, this office, and our partners against serious violence in West Yorkshire. This issue has been an important aspect of my work over the past two years: in 2018 I was appointed as lead on the Association of Police and Crime Commissioners' (APCC) Serious Violence Task Group and subsequently attended the then Prime Minister's serious youth violence summit. I am currently overseeing the establishment of West Yorkshire's Violence Reduction Unit (VRU) to help in the longer term fight to prevent such crime from occurring.

In recent times we have all become more aware of the damage caused by County Lines offending; its links to modern slavery, child sexual abuse and exploitation, serious violence, and the exploitation of the vulnerable. In West Yorkshire, our response has paired enforcement and prevention. Working with partners, West Yorkshire Police have run intensive programmes of disruption of County Lines criminals alongside measures to safeguard their victims. In October last year, enforcement activity led to 33 arrests and the seizure of Class A drugs, cannabis, and a range of weapons (including air powered pistols, samurai swords, and a machete), as well as the confiscation of £18,000.

This work has been supported by prevention campaigns in schools and pupil referral units, and has been accompanied by my own work against serious violence, notably through serious violence themed grant rounds of my POCA funded Safer Communities Fund, which was established to support community led crime prevention.

Tel No: 01924 294000 Email: markburns-williamson@westyorkshire.pcc.pnn.gov.uk



In addition, I have also provided funding for a Huddersfield University and Leeds & Kirklees Youth Offending Team research project exploring the links between violence and young peoples' inappropriate use of social media, and a series of sessions in schools which challenge the myth of the glamour of street gangs and highlight the harm caused.

HMICFRS's report has highlighted several issues which are relevant to West Yorkshire Police's and our partners' work against County Lines, and which I respond to in the points below:

Improving national tasking arrangements

The inspection report calls for a 'more coherent and integrated system of national tasking' in response to County Lines offending. We would concur that the NCA (through the National County Lines Co-Ordination Centre) is best placed to assess the national the county lines threat, and consequently, there is an advantage in them taking a firmer role in identifying regional and sub-regional priorities. However, 'small scale' does not necessarily mean 'low harm' when considering the threat to vulnerable people which County Lines presents. A national co-ordinator will still need to be receptive to local priorities should tasking responsibilities be further assigned to the NCA, and greater embedding of such activity should be co-located in the region.

Collation of data for the County Lines Intelligence Matrix

We feel the CLiCM (County Lines Intelligence Collection Matrix) reports provide a useful intelligence platform, offering a good overview of the crossover between West Yorkshire Police and other forces to help understand the threat of County Lines. However, like any intelligence/analytical tool, it is dependent on accurate data being submitted – particularly with regard to the identification of vulnerable individuals. The two-way benefits and impacts of County Lines intelligence analysis need to be better understood.

West Yorkshire Police have been driving improvement in this area by working with the NCA in raising awareness of the benefits of the CLiCM tool to police colleagues, and promoting accurate and timely submissions of data to the National County Lines Coordination Centre. This work has been promoted by a CLiCM workshop event, an online training package, and force-wide briefings.

The feedback and 'buy in' from police colleagues has been very positive. There has been an increase in the quality of data submissions to the NCA, and WYP are aware from speaking to NCA colleagues that the force is recognised as performing well in intelligence compliance.

Barriers to exchanging information between partners

WYP's Programme Precision provides the vehicle for our police service to work strategically with local partners to tackle organised crime in West Yorkshire. We feel that the sharing and exchanging of information has improved as a result of such partnership work. Further improvements could be made in access to NHS data (to help identify links between county lines, exploitation of the vulnerable, and victims of

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violent crime). However, with the NHS as a key partner in the establishment of our West Yorkshire Violence Reduction Unit, we can expect that the link to this data will be strengthened in the months ahead, but clearly there is more to do.

Movement of vulnerable 'high-risk' children away from their home region

The report mentions cases of local authorities failing to inform the police when they move children deemed at risk of exploitation into children's homes in a different local authority area.

We are aware that this is a concern across the country, with a lack of communication between local authorities and respective police forces, who may only become aware of the relocation of a vulnerable child when there is an incident reported to the police, i.e. a missing episode from a place of care.

We would support the inspectors' recommendation for the Department for Education to develop systems to allow police forces to be notified when local authorities move high-risk children into a new area. There needs to be a robust process in place to inform and manage the risk and intelligence around the movement of looked after children. Relevant input from the police and local agencies will act to safeguard and prevent children being exposed to further harm.

The response to serious violence in West Yorkshire will evolve in the months ahead as we develop the Violence Reduction Unit and build on some of the work mention above. In the meantime, I will continue to monitor West Yorkshire Police's work to tackle County Lines offending through the channels I have in place to hold the Chief Constable to account both locally, and through regional collaboration.

Yours sincerely

Mark Burns-Williamson

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Police and Crime Commissioner for West Yorkshire

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