MODERN SLAVERY & HUMAN RIGHTS | POLICY & EVIDENCE CENTRE

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# Understanding the Online Recruitment of Children into Criminal Exploitation in the UK

Research Summary

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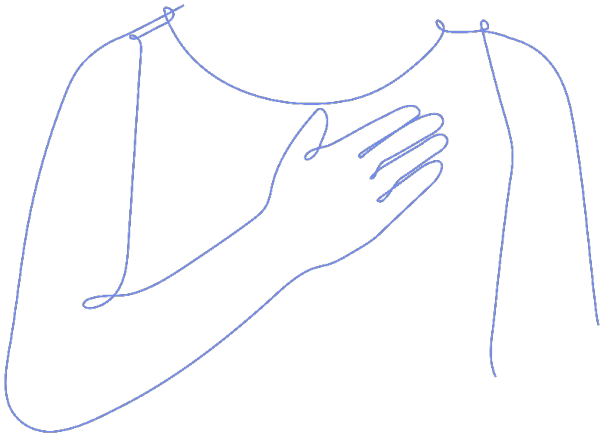
This is a summary of two interconnected reports on 'Understanding the Online Recruitment of Children into Criminal Exploitation in the UK', a research project funded by the Modern Slavery and Human Rights Policy and Evidence Centre (PEC) led by the University of Oxford, which in turn is funded and supported by the UK Arts and Humanities Research Council (AHRC).

The research was conducted by **Dr Anna Skeels (Cardiff University)** and **Hannah Stott (Safe to Grow)** in partnership with **Barnardo's Independent Child Trafficking Guardianship (ICTG) service.** The full report and supplementary Gap Analysis can be found on: https://files.modernslaverypec.org/production/assets/downloads/Understanding-the-Online-Recruitment-of-Children-into-CCE-Full-report.pdf?dm=1793789864 **and** https://files.modernslaverypec.org/production/assets/downloads/Understanding-the-Online-Recruitment-of-Children-into-CCE-Gap-Analysis.pdf?dm=1793789887

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# Acknowledgements

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# Key Findings

**Online Child Exploitation is defined by The Children's Society as 'an individual or group using online platforms to take advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity that can occur both online and offline' (2021). Criminal activity can include fraud, money laundering, the supply and transportation of drugs and associated money and weapons ('county lines'), burglary and shoplifting and other offences.**

1: **Children in the UK are being recruited into criminal exploitation online at scale across multiple digital platforms, with many children affected going unrecognised and perpetrators under-investigated.** Perpetrators' tactics intersect and continually evolve, which makes them difficult to identify and mitigate against.

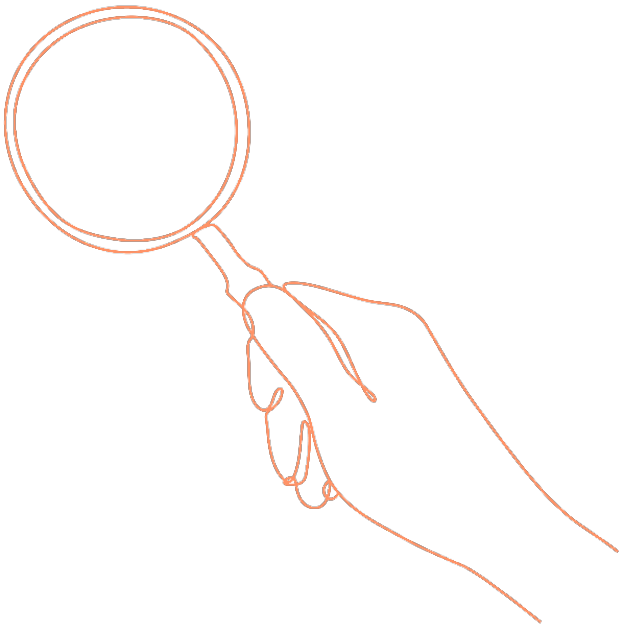
2. **Children experience multiple and overlapping forms of exploitation, demonstrated by ten online recruitment pathways into CCE identified through this research.** However, legal and policy responses frequently silo harms, thus missing or misunderstanding the full nature and extent of harm from children's online recruitment into criminal exploitation.

3. **Mitigation of online recruitment into CCE in the UK is currently inadequate, with practitioners under-equipped and overwhelmed in their efforts to prevent and disrupt harm.** A critical lack of data, research, and children's participation present obstacles to addressing the problem and co-designing effective interventions.

4. **The principal legal and policy challenge is not a lack of legislation, but the fragmentation of legal, regulatory, safeguarding, and criminal justice responses.** The absence of a consistently applied understanding of CCE across policymakers and practitioners

contributes to wide variation in identification, support, and justice outcomes. New legislative developments may improve recognition, but also risk creating additional complexity across existing modern slavery, human trafficking, and exploitation frameworks.

5. **A coherent, child-centred, system-wide, and coordinated response is required.** Efforts must build on existing relevant initiatives - for example those tackling CCE 'offline' or disrupting online grooming into child sexual exploitation (CSE) - to ensure children recruited online are consistently identified, protected, and supported, and perpetrators are brought to justice.



# Background

**'The criminal exploitation of children is a form of child abuse in which a young person is manipulated or pressured to take part in criminal activity, often through threats of violence alongside serious physical, emotional and sexual harm. It encompasses a range of forms including dealing and transporting drugs (including county lines) or weapons, cannabis cultivation, forced home invasion, theft and burglary.' (The Children's Society, 2024:9)**

This research project explores the online recruitment of children into criminal exploitation in the UK. It identifies a significant and concerning gap between the level and scale of harm happening to children and the attention given to this issue in academic literature, policy and legislation.

This is, we believe, the first dedicated research project investigating CCE in the UK as it manifests online: the digital platforms involved, the children most at risk, the recruitment pathways and tactics employed, the harms to children that result and potential mitigating interventions. It is also the first time that research systematically investigates how online recruitment into CCE fits within current UK legal definitions, law, policy and guidance frameworks, identifying gaps, as well as the implications for how online harm is prevented, how children are identified and protected, and how perpetrators can be disrupted and prosecuted.

This substantive focus on the online recruitment of children into criminal exploitation in the UK and its legal and policy landscape is long overdue. Organised Crime Groups, their networks and activities, significantly shifted online during the COVID-19 pandemic and related lockdowns. They have remained 'hybrid' ever since, exploiting children online and 'offline' at an ever-increasing scale. UK children's charities

working to address CCE, like The Children's Society, Action for Children and Barnardo's, have reported on this concerning issue in real time, and campaigned for its explicit inclusion in the UK Online Safety Act (OSA) 2023 alongside CSE as a 'priority offence'. The OSA does not, however, yet include CCE as an online risk to children and this needs to be urgently addressed.

The UK has legislation in place focusing on digital regulation, as well as strict data protection laws and regulations, a robust and evolving child protection framework including harm beyond the home and a far-reaching criminal offence framework covering different offending behaviours related to CCE online. However, the effectiveness of this current legal and policy landscape in addressing online recruitment of children into criminal exploitation is hindered by its fragmentation. Our review finds that although individual frameworks provide important safeguards, their lack of integration creates gaps, inconsistencies and opportunities for perpetrators to exploit weaknesses *between* systems. While these incoherent approaches persist, the ability to prevent online recruitment into criminal exploitation, protect children effectively and deliver consistent criminal justice outcomes is likely to remain compromised.

This legal and policy fragmentation is compounded by limited research into and data on child criminal exploitation online in the UK. Existing academic literature tells us very little about how CCE manifests online, with this topic given brief attention and positioned mostly at the margins of studies on child criminal exploitation. Interviews with practitioners for this research, however, reveal that online recruitment of children into criminal exploitation is complex, dynamic, happening across multiple digital platforms and at scale. Snapchat, TikTok, Instagram and WhatsApp, for example, all platforms mentioned as part of recruitment pathways by these practitioners, are, according to Ofcom, growing in popularity and being used by approximately half (46%, 53%, 41% and 55%) of 3-17-year-olds in the UK. While certain platforms and risks can be identified, practitioners stress that such recruitment can potentially take place on 'any platform' and affect 'any child'. They also emphasise the complex and evolving nature of the

problem where recruitment pathways adapt, shift and change. Practitioners feel overwhelmed and under-equipped in their efforts to prevent and disrupt such exploitation.

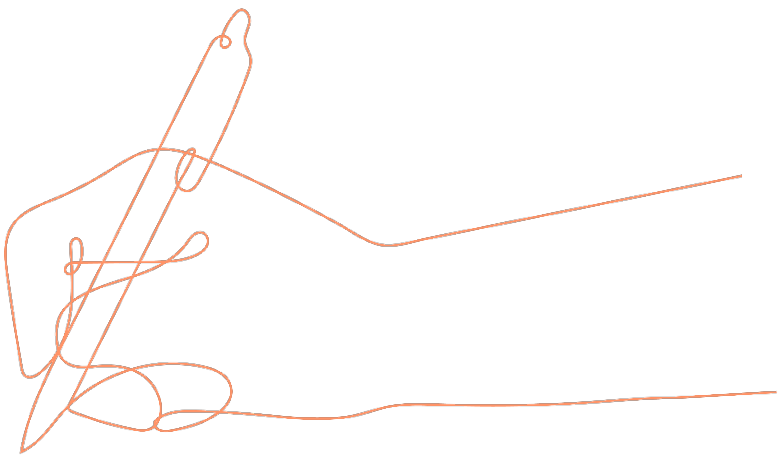
The research also reveals the complex harm caused by the online recruitment of children into criminal exploitation and its underestimation, contesting the perception that harm is minimal where this takes place 'just' or 'only' online. It is clear that multiple, intersecting forms of harm - physical, sexual, emotional, psychological, financial, criminal - can and do occur as the exploitation evolves. Criminalisation and 'victim blaming' is preventing the support and protection of these children, and a significant reconceptualization of their status as victims of exploitation is required.

Despite this catalogue of harm, our research identified limited existing interventions and mitigations targeting online recruitment of children into criminal exploitation. A lack of data and academic investigation to date present an obstacle to addressing this problem and to designing effective interventions. However, if we recognise the intersectionality of exploitation and the commonalities in grooming/recruitment processes then there is potential to learn from effective existing interventions such as those addressing grooming and CSE online (where much academic research and digital expertise have focused to date). There is also potential for innovation, bringing safeguarding and digital experts together with children impacted by CCE online to generate feasible and agile solutions that respect children's rights and needs and can operate effectively at scale. Such mitigation requires a system-wide response that builds on efforts to address all forms of child exploitation both online and 'offline'.

# Methodology

This research is based on four interconnecting sources of evidence: a review of academic and 'grey' literature, 12 semi-structured interviews with practitioners working to support children affected by criminal exploitation, engagement with the PEC's Lived Experience Advisory Panel, and a legal and policy 'gap analysis'.

The first three sources of evidence are combined in a 'realist-informed review', drawing from a highly policy-relevant approach which aims to identify 'what works for whom, in what circumstances, in what respects and how' (Pawson et al, 2005: 21). While the research follows this broad approach - identifying contexts, risk factors, mechanisms and harms - insufficient data was available for a more detailed disaggregation of outcomes by groups of children required for a 'realist review'. The fourth source, a targeted, desk-based 'gap analysis', employs a systematic approach to identify relevant legislation, policy and guidance across the four UK nations (and, where applicable, within Europe and internationally), with 59 documents included and reviewed.



# Recommendations

## For the UK Government

1. **Include CCE as a priority offence in the Online Safety Act's Schedule 7:** The UK government should add CCE as a priority offence under the Online Safety Act by including it in Schedule 7 of the Act. This new CCE priority offence should not be siloed but considered alongside other priority offences, existing and future, relating to child exploitation and human trafficking as well as harmonised with the 2026 Crime and Policing Act definition of CCE. Statutory guidance on harms relating to CSE should explicitly recognize how CSE and intimate image abuse can be criminally motivated and intersect with CCE.

## For Ofcom

2. **Address CCE in the Children's Code of Practice and Register of Risks:** Ofcom should address CCE in the Children's Code of Practice and include it in the Children's Register of Risks as an additional risk. The new entry in the Children's Register of Risks should recognize the interconnection of CCE with multiple other risks, harms and offences that 'victims' of CCE can encounter, such as, but not limited to grooming, intimate image abuse, and coercive and controlling behaviour[1]. CCE should also be recognized in Ofcom's general online safety Register of Risk.

[1] This research demonstrates the interconnections between the online recruitment of children into criminal exploitation and other risks, harms and offences already included in the Children's Register of Risks including CSEA, terrorism, grooming, hate, intimate image abuse, harassment, stalking, threats and abuse offences, coercive and controlling behaviour, fraud and financial offences, proceeds of crime, drugs and psychoactive substances, human trafficking and firearms, knives and other weapons.

## For the Ministry of Justice

3. **Recognise online recruitment as part of the formal definition of CCE:** The forthcoming MoJ Statutory Guidance on the Crime and Policing Act 2026 must recognize the online recruitment of children into criminal exploitation and CCE online in its formal definition of CCE. The Guidance should raise awareness of the potential risks to children of being recruited online into criminal exploitation, the methods employed by perpetrators and the harms involved. The interconnection between online and 'offline' tactics and harms as well as between CCE and CSE and other forms of child exploitation and human trafficking must be highlighted.

## For the Home Office and Department of Education

4. **Develop and implement a statutory definition of Child Exploitation:** To mitigate risks associated with siloing exploitation types, the Home Office and Department for Education should develop and implement a statutory definition of Child Exploitation. This should account for both online and offline recruitment of children into all forms of exploitation, including where they intersect. The definition should align with international human trafficking standards and recognise recruitment and harbouring as acts of trafficking, rather than requiring movement or travel for exploitation to be recognised.

## For the UK Government and Devolved Administrations

5. **Embed a child-rights approach to policy and practice development, including digital safety:** Greater consistency is needed in how children affected by exploitation are recognised and responded to. UK Government and devolved administrations should embed a consistent child-rights, child-first approach across digital regulation - both existing and future - child protection and criminal justice policy and practice responses to child exploitation, ensuring children are recognised as victim-survivors of abuse rather than offenders.

6. **Develop an integrated, UK Cross-Government information gathering strategy for child exploitation:** In response to the current fragmentation of information held across protection systems, about children impacted by CCE and other forms of exploitation, the UK Government and devolved administrations should develop an integrated information-gathering strategy for child exploitation. The strategy should establish common data requirements and consistent approaches to the identification, collection, recording, sharing and analysis of information across digital regulation, child protection, education and health, criminal justice and the National Referral Mechanism.

7. **Establish nationally a set of minimum standards to ensure consistency in the prevention, identification, safeguarding and support of children recruited into exploitation:** There is a need for greater consistency in how children recruited into exploitation are identified, assessed and supported across safeguarding, education, health and criminal justice systems. The UK Government and devolved administrations should establish a UK-wide set of minimum standards for the prevention, identification, safeguarding and support of children recruited into exploitation.

The aim, to promote a coordinated and child-centred response across agencies and jurisdictions, with specific focus on children's outcomes. The standards should set out expectations for recognising recruitment pathways, undertaking multi-agency risk assessment and support, sharing relevant information, developing coordinated safety plans, disrupting exploitation and consistently recognising children as victim-survivors of abuse. Implementation should be supported through up-to-date legislation, evidence-informed statutory guidance, workforce development, multi-agency training, professional standards and inspection frameworks. The Department for Education, Home Office and Department of Health and Social Care should have defined responsibilities for implementation, working with devolved administrations, professional regulators and workforce development bodies.

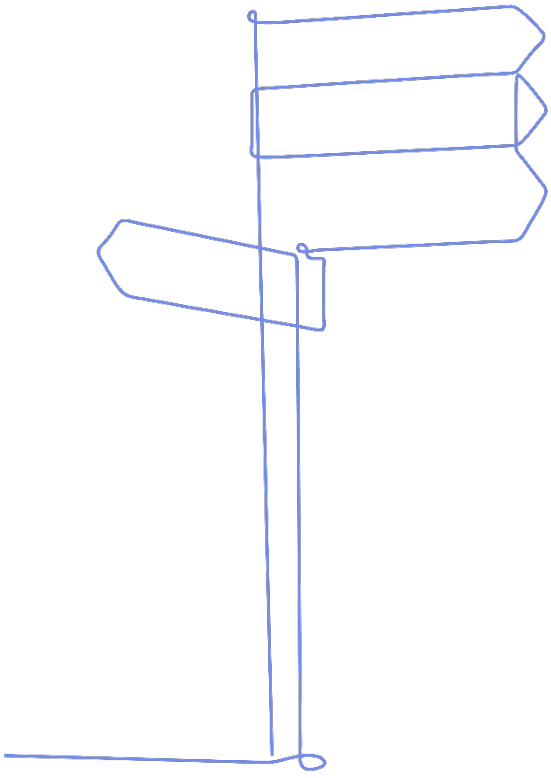
## For the Independent Anti-Slavery Commissioner, Department of Education, Home Office, and devolved equivalents

8. **Raise awareness of and better equip frontline practitioners:** The IASC working with the Department of Education, Home Office and devolved equivalents should raise awareness of all 'first responders', guardians and trusted adults on - and drive integration of - the online recruitment of children into criminal exploitation into multi-agency, child-centred efforts to safeguard children from exploitation. Such collaborations should include the ongoing identification of gaps in knowledge and safeguarding practices related to online recruitment, as well as the development of tools, resources and mechanisms needed by frontline practitioners for support.

# Areas for further research

Children affected by online recruitment into criminal exploitation did not participate in this research due to the limited timeline, which we considered insufficient for children's safe and meaningful engagement alongside the other key project components.

The experiences, views and perspectives of children affected by online recruitment into criminal exploitation are, however, essential for us to fully understand and address this problem. There is an urgent need for further research to be undertaken in collaboration with and supported by relevant child-centred organisations working with children affected to enable this.



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