



Online Safety Act

Protecting children from
harms online

Consultation

The Children's Society's response

July 2024



About The Children's Society

The Children's Society is a leading national charity committed to improving the lives of thousands of children and young people every year. We work across the country with the most disadvantaged children through our specialist services. Our direct work with vulnerable young people supports missing children, children with experiences of sexual exploitation, criminal exploitation, children experiencing and witnessing violence and abuse, children in or leaving care, children experiencing poor mental health and well-being and refugee, migrant and trafficked children. We work to tackle the underlying causes that prevent young people who face multiple disadvantages and vulnerabilities from thriving.

The following response is informed by The Children's Society's long history of supporting children and young people facing disadvantage, consultation with staff and learning from our direct work with children as well as our significant catalogue of policy research relating to the criminal and sexual [exploitation](#) of children and older adolescents in particular; [Peer-on-peer abuse, education exclusion and behaviour policies](#), and [keeping children safe in education](#),

Our response focuses on Volumes 3 and 4 of the Protecting children from harms online consultation, which address the causes and impacts of online harms to children, and the assessment of the risk of these harms. We address the specific risk and harm of Child Criminal Exploitation (CCE) online, which was not covered in the Draft Illegal Content Codes for different types of online services included in a previous Ofcom consultation, nor is it covered in Volumes 3 and 4 of the current consultation. We have chosen this narrow focus because we consider this a serious omission with potentially far-reaching negative impacts on children and young people affected by criminal exploitation that was initiated through online contact or initiated offline and progressed using online contact as a means to facilitate ongoing abuse and control, e.g. directing their activity and movement. Furthermore, the rest of the content of the consultation is aimed at online service providers and more technical in nature, and thus outside our remit.

Introduction

More and more children are accessing online content via mobile phones and other devices at an increasingly younger age. Ofcom's own statistics show that almost all children spend time online, and that the vast majority of them own a mobile phone by the time they're 11 years old.¹ Social media platforms for the most part have a minimum age limit of 13, yet 60% of 8–12-year-olds manage to circumvent these limits to set up their own social media accounts. Of children in the UK aged between 3 and 17, 89% had played video games in the last year and 77% of 7- to 18-year-olds have access to a games console.²

¹ [How the Online Safety Act will help to protect children - Ofcom](#)

² Office of the Children's Commissioner. 2024. Digital playgrounds - Children's views on video gaming. [CC A4 HEADER \(childrenscommissioner.gov.uk\)](#)

The Government recognises the significant risk and potential harm that children and young people are exposed to via social media, gaming and other online platforms, and we welcome the Online Safety Act as a significant opportunity to keep children and young people safe online. However, while the Online Safety Act is strong on tackling online Child Sexual Abuse and Exploitation (CSAE), it missed a chance to crack down on CCE, which³⁴, often occurs alongside other harms such as CSAE, and is often facilitated by online social media and gaming platforms.

The connection between CSAE and CCE is strong, and only combatting one of these types of abuse will risk allowing perpetrators to continue operating undetected. Our experiences at The Children's Society of working with criminally exploited children have shown that many of them also experience CSAE. By not tackling CCE in the Online Safety Act and subsequent regulations, there is a missed opportunity in preventing and disrupting CSAE that may be happening as part of the criminal exploitation. The sexual abuse and exploitation may take place in the physical world, but the initial grooming of the child into a criminally exploitative situation may have taken place online.

CCE is the encouraging, grooming and coercion of children into criminal activity. The Children's Society uses a definition of CCE from young people who describe it as '**when someone you trusted makes you commit crimes for their benefit**'. This definition conveys the key components of exploitation – a trusted person taking advantage of vulnerability to deceive, control, coerce or manipulate children into criminal activity. In some cases, children are enticed to take part through manipulation and the promise of reward, and in other cases violence, threats of violence, and sexual abuse, play a more direct role in how control is exerted. Furthermore, CCE and 'county lines' (the most common and well known form of CCE) are constantly evolving, as are criminals' methods of targeting children and teenagers. So, it's not always face to face or children moving drugs from one area to another – the method of targeting the child could consist, for example, of online contact or financial fraud which started through online contact.

As we show in more detail below, ample evidence from research, and conversations with children, young people and professionals, point to the significant role that online platforms play in facilitating CCE.^{5 6}

As such, The Children's Society and a range of charities across the children's sector urged the Government to ensure that the Online Safety Bill includes CCE and Modern Slavery as illegal content and a potential harm to children and young people. We also urged them to recognise the role of online grooming, coercion and control in CCE. Finally, we advised policy makers to ensure

³ Maxwell, N., Wallace, C. 2021. Child Criminal Exploitation in Wales. [CCE-Interim-report-Final-04.10.21.pdf](#)

⁴ The Children's Society. 2019. Counting Lives. [counting-lives-report.pdf \(childrenssociety.org.uk\)](#)

⁵ e.g. Volteface (2019) DM for Details: Selling Drugs in the Age of Social Media DM-for-Details-15-2.pdf (volteface.me)

⁶ Storrod, M. & Densley, J. 2017. 'Going viral' and 'Going country': The expressive and instrumental activities of street gangs on social media. *Journal of Youth Studies* 20: 677–696.

that the Bill provides guidance to Ofcom to produce a separate code of practice for CCE, including detailed procedures that Ofcom would require companies to take to address it.

Unfortunately, our recommendations did not make it into the Act, as policy makers deemed that existing powers would allow Ofcom to act if needed. We strongly disagree with the assessment regarding existing powers to tackle CCE, as there currently is no statutory definition of CCE and, so far, measures aimed at tackling CCE under Modern Slavery legislation have been piecemeal and inconsistent.⁷ Furthermore, Modern Slavery legislation does not include any consideration of the role of social media, online gaming or other online platforms in grooming and controlling children. Nor does it set out a clear direction for companies to tackle these issues. Also, when child exploitation and abuse happens online, often there is no “movement of the child” which creates significant barriers in utilising the Modern Slavery legislation, as Section 2 – ie the human trafficking element – is not met. The Online Safety Act addresses some of these issues but fails to consider the different methods and pathways used by perpetrators of CCE.

We welcome this new consultation on proposed regulations for the measures that online service providers will need to put in place to keep children safe online. We, like the Government, also want the UK to be ‘the safest place in the world to be a child online.’⁸ However, the proposed regulations makes no mention of CCE and the acts of grooming, coercion and control that are characteristic of CCE, as well as CSAE.

We urge Ofcom to take advantage of this opportunity to strengthen the regulatory framework that will require online service providers to put in place the measures to ensure children and young people who use their services are protected and kept safe from harm. To be truly effective, we believe that the regulations should reflect the significant role that online platforms play in facilitating the criminal exploitation of children. Examples of this include children and young people not being protected from convincing false advertisements that trick them into moving money for organised crime groups, or fake accounts and ‘influencers’ coercing children to launder money. It should put in place measures that will allow the platforms to keep children out of reach from criminals who seek to coerce and groom them to commit criminal acts or fraud. Furthermore, the measures should facilitate online service providers to work with police and other relevant authorities to disrupt perpetrators who manage to circumvent the online safeguards put in place to protect children from online harms.

⁷ Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders, Questions for Ministry of Justice. 2020. <https://questions-statements.parliament.uk/written-questions/detail/2020-12-30/133074>

⁸ [Online Safety Act: explainer - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/explainers/online-safety-act-explainer)

Key points and recommendations:

- **The proposed regulations under the Online Safety Act should recognise that children are groomed online for criminal exploitation.** The Online Safety Act does not explicitly address the risks and harms of **CCE** posed by online platforms. It should also include these risks in the ‘children’s risk assessment’ online providers will have to conduct to assess the risks their service(s) pose to children.
- **Online controlling and coercive behaviours (CCB) for the purpose of CCE should be addressed in the proposed regulation.** We urge Ofcom to ensure CCB for the purposes of CCE is addressed in the proposed regulation. Online service providers must take action on the use of ‘mothering’ and ‘online collateral’ (described in more detail below) by criminals to coerce and control children and young people into committing criminal acts and fraud.
- **Ofcom should recognise and address the fact that perpetrators use online grooming for both CSAE and CCE.** Online grooming into CCE includes luring children in through quick and easy ways to make cash, through fake job ads and through offers of ‘free’ online currency, skins or collectibles. It can simply involve communication with a child to establish a relationship. Ofcom recognises that this process of grooming can happen in relation to CSAE. Grooming online for CCE also includes glamourising criminal activity and the potential financial and other benefits children can gain from crime. We therefore strongly urge Ofcom to recognise and address the fact that some of the same methods used by perpetrators to groom children into CSAE are also used for luring them into criminal activity and exploitation.
- **Introducing a legislative change to recognise the coercion and control of children for the purposes of exploitation as a separate offence, would facilitate more effective disruption against those who perpetrate CCE against children online.** (Coercion and control are already offences in the context of domestic abuse or intimate relationships). This offence would enable law enforcement to disrupt exploitation sooner within its cycle, when it is first suspected or identified through monitoring of online platforms.
- **Ofcom should include financial exploitation of children in the ‘Children’s risk assessment’ that online service providers are expected to conduct.** Authorities are increasingly concerned about children and young people being coerced online to commit criminal acts such as financial fraud and money laundering. We urge Ofcom to include this form of CCE in the ‘children’s risk assessment’.
- **The new government should introduce a statutory definition of CCE as a priority.** This policy won’t cost anything but will help to create shared understanding across agencies, including Ofcom, and ensure child victims are identified early on and are treated as such, not as perpetrators, and receive the appropriate support. **We welcome the focus in the King’s Speech on strengthening police powers to deal with adults who target children for**

criminal exploitation via the new Crime and Policing Bill - the inclusion of a statutory definition of Child Criminal Exploitation within the Bill can help support the tens of thousands of children across the UK who are exploited into a life of criminality and violence.

- **We urge all relevant stakeholders to foster cross-government collaboration as this is crucial to the successful implementation of Ofcom's proposed regulation.** Government should also ensure all relevant legislative powers are applied to keep children safe online and to disrupt perpetrators seeking to criminally exploit children online.

For more information regarding our response, please get in touch with Claire Mock-Muñoz de Luna, Policy officer at The Children's Society at Claire.mock@childrenssociety.org.uk; or Azmina Siddique, Policy and impact manager at Azmina.Siddique@childrenssociety.org.uk.

The role of technology in exploitation

Children can be groomed, coerced and threatened into criminal exploitation online. This is seen by our practitioners working directly with children, shared by police (as in the case study below), and reported in media. The BBC reported on how young people are groomed online by criminal groups into criminal activity related to drug distribution.⁹

Police Case Study: criminal exploitation of children as a result of online grooming

Two young people aged 16 were reported as missing from their homes in the West Midlands area. They were assessed by police as high-risk missing persons due to their age and vulnerability. The checks on their phone locations showed that they were both located in the same area in Eastern region in Essex, around 180 miles from their home.

As a result of co-ordinated activity between police forces in the two areas and the British Transport Police, the two young people were eventually found at a train station in London. At the time they were found they had in their possession a large quantity of what appeared to be crack/cocaine and young people were therefore arrested for Possession with intent to supply of a Class A drug.

On arrest, both young people had their phones seized and reports compiled. As a result of the police investigation during the missing episode and following the arrest, it was established that prior to going missing both young people were contacted on Snapchat by three unnamed males. There were numerous contacts that turned threatening when the young people were ordered by the unnamed males to collect a package with drugs from one location and to deliver it to the location in the Eastern region of Essex to distribute. Threats were made by the unnamed males in relation to the young people and in relation to their families if the young people would not comply. The messages insinuated that the males knew the location of the family of one young person. One of these young people were also physically assaulted when they had come into contact with the males following receiving these instructions.

As a result of investigation one of the males who groomed and exploited the young people was arrested on human trafficking charges. Information located on seized phones allows for victimless prosecution, that does not rely on disclosure and evidence from the exploited young people.

The exploitation can take a variety of forms, including children being forced to work in cannabis factories, coerced into moving drugs or money across the country, forced to commit financial fraud and money laundering, forced to shoplift or pickpocket.

Research has found evidence that older members of a criminal group were grooming younger children for participation in instrumental gang activities, initiating contact then outsourcing tasks

⁹ [County lines gang 'recruited teen in 80 minutes via Snapchat' - BBC News](#)

and errands via social media that got progressively more difficult or risky.¹⁰ This study found messages and memes on Twitter and even a profile picture on YouTube that doubled as an advertisement for making ‘quick and easy money’ from drug dealing.

The research notes that these platforms provide opportunities for dealers to build trust with potential customers, with young people highlighting that they are more likely to see an account advertising drugs as a ‘friend’, rather than as a ‘dealer’. This can leave young people vulnerable to exploitation, as well as reduce any trepidations they may have around buying drugs.

This research also revealed that dealers can advertise their associated lifestyles to their social media networks, for example, by posting pictures of luxury items and cash – a technique that can be used to recruit and control victims. There are reports that social media is changing how the ‘county lines’ model operates as there is no longer the need to transport children from cities to rural areas to sell drugs, as children who live in those rural areas can be groomed using social media.¹¹ The research suggests that a range of digital platforms may be used to target young people for recruitment, and digital technologies are being used to monitor their whereabouts when made to travel to distribute drugs, and online banking for money laundering purposes.

Our practitioners report that children are targeted using every platform available – apps, the web, and games – with perpetrators managing to circumvent intended restrictions. Furthermore, we see children being targeted in every location of the country, and while some are made to travel long distances, others are made to distribute drugs locally. This means that the ‘county lines’ definition usually referred to by police and others is outdated and in need of revision.

Apps: Perpetrators use apps such as Snapchat, Discord, TikTok, Telegram and Instagram to recruit children with an offer to make quick cash. Some of these apps leave little trace as messages are deleted immediately. These are by no means the only apps being used. Telegram for example is used heavily for CCE relating to drugs, including bots selling drugs to children on the platform. Anecdotal evidence shared by police with TCS shows that money laundering and financial exploitation recruitment is commonly occurring on Instagram, Snapchat and TikTok. Discord is also being highlighted, though due to underreporting, the true scale of the use of these apps by perpetrators is unknown. The perpetrator will not be in direct contact, instead they will often use an already exploited child as an intermediary to promote the offer to the targeted child. Both children are exploited, and threats and coercion are often used to control children.

Websites: Various websites are used to groom children, targeted for the specific cohort of children they might cater to. For example, migrant children are targeted over sites directed to those speaking foreign languages, while children in need of money are targeted on such sites as Facebook Marketplace or Vinted. Fake adverts are used on these platforms and not just for children in need of money, but also as a way to groom and gain access to someone’s home

¹⁰ Volteface (2019) DM for Details: Selling Drugs in the Age of Social Media DM-for-Details-15-2.pdf (volteface.me).

¹¹ Volteface (2019) DM for Details: Selling Drugs in the Age of Social Media accessed on 6 June 2022 DM-for-Details-15-2.pdf (volteface.me)

address, for example, by posing as a handyman when someone is looking for a workman. Once contact is established with a child, they might be asked for intimate and/or sexual images or video of themselves or other child sexual abuse material (CSAM) in exchange for money or will receive packages with drugs included to lure them into using certain accounts. Often, in conversations starting online children may initially believe that they are communicating with someone close to them in age.

Online games: Perpetrators target gaming platforms, which include adverts or settings for purchases, as well as 'gacha' mechanics, loot boxes and or online credit and purchase mechanisms. A child might click on an advert suggesting money can be made through a service and then find themselves bombarded with messages containing intimate and/or sexual images or video of themselves or other CSAM. Or while playing a game, a child might be encouraged to purchase further credits or collectibles for themselves or other players, only to subsequently have their account hacked. Perpetrators may also use the chat functions in online games to communicate with and groom children through playing games alongside them and building a sense of connection, before going on to criminally exploit and abuse them. Many games include such functions and, given how common online gaming with strangers is, it is an easy way for perpetrators to initiate contact with a child and then have a 'shared experience' with them to build an exploitative relationship.

Perpetrators use various means to coerce and control children and young people into committing criminal acts. Research highlights the role of 'remote mothering and online collateral' on smart phones and social media as well as through popular culture in criminal exploitation of children.¹²

- **Remote mothering** is the ability to monitor where someone is, what they are doing, and who they are with at all times via locations tags, GPS tracking, pictures and video calling.
- **Online collateral** is the use of incriminating images, videos, screen shots of messages, and voice notes to ensure compliance, through control and coercion, especially among subordinate criminal group members and girls.

The scale of online grooming for criminal exploitation of children

The true scale of CCE is not known as many children who are exploited or groomed fall through the cracks of statutory support and therefore are not identified in official statistics.

In the year ending March 2023, children made up nearly half (44% or 7,432) of all referrals to the National Referral Mechanism (NRM) – a framework for identifying victims of modern slavery, exploitation and trafficking – the highest number on record. Child criminal exploitation makes up nearly half of those referrals (42% or 3,123 referrals for under 18s for the year ending March

¹² Storrod, M. & Densley, J. 2017. 'Going viral' and 'Going country': The expressive and instrumental activities of street gangs on social media. *Journal of Youth Studies* 20: 677–696.

2023).¹³ The number of children referred into the NRM has continued to rise, from 191 referrals in 2010 to 4,946 in 2020 and 6,657 in 2023.^{14 15}

CCE is the most prevalent form of child abuse reported into the NRM, and sexual exploitation referrals is the third with almost 600, after labour exploitation.¹⁶ Yet as the Home Office data tables reveal, many children (2,258 in 2023) experience multiple forms of exploitation at the same time, for example criminal and sexual exploitation.¹⁷

Additionally, according to research by the Youth Endowment Fund in 2022, 20% of young people report having seen online content promoting gang membership in the past 12 months and 24% report seeing content featuring carrying, using or promoting weapons.¹⁸

The limited data that is available paints a worrying picture – we know from the young people we support that the number of children experiencing exploitation is likely to be much higher than the officially reported cases, as children find it difficult to disclose their experiences to professionals, due to the fear of their perpetrators, of not being believed, or because of earlier negative experiences with police or social care.

Financial exploitation of children

The county lines model of CCE is reasonably well understood, but other forms such as financial exploitation, are becoming a growing concern. Law enforcement and the financial sector refer to financial exploitation with the term ‘money muling’ which encompasses crimes such as fraud and money laundering.¹⁹ At The Children’s Society, our frontline staff are increasingly seeing young people being groomed or forced to commit financial fraud and money laundering. Many of the criminally exploited young people we support have mentioned social media and online contact between themselves and their exploiters. Our practitioners report seeing a notable increase in online grooming for CCE since the pandemic.

Criminals befriend young people often through social media, and groom them through online games. They offer them gifts, promise easy money, gaming credits, or cryptocurrency. Once they’ve gained a young person’s trust, they force them to carry out fraudulent activities, like opening a bank account for them.

¹³ See Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023 - GOV.UK (www.gov.uk)

¹⁴ [Modern Slavery: NRM and DtN statistics, end of year summary 2023 - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

¹⁵ See Section 2.1 Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023 - GOV.UK (www.gov.uk)

¹⁶ .S See Table 4: [Modern Slavery: NRM and DtN statistics, end of year summary 2023 - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

¹⁷ Ibid.

¹⁸ Youth Endowment Fund (2022), Children, violence and vulnerability 2022

¹⁹ [Money Mules - National Crime Agency](http://www.nca.gov.uk)

The increasing use of social media and gaming platforms means that young people have never been more vulnerable to becoming victims of fraud and children are increasingly being groomed into illegal activities like money laundering. We know young people are affected by this both online and offline:

- At cashpoints: Approached at cash points as exploiters know they will have a bank account that can be accessed.
- On social media and gaming platforms: Sent fake job adverts or asked to share their bank details.
- Through 'relationships': Including parents, carers and wider family and when young people are made to believe they're in a consensual romantic relationship and manipulated into holding money on behalf of their partners.
- In retail settings: Made to return high value goods with stolen receipts, or to shoplift.

Financial exploitation can cause significant harm to a young person and have long lasting effects on their life. Victims can have their bank accounts suspended for five to seven years and in the worst cases, young people in their teens, can face up to 14 years in prison. A suspended bank account means that a young person is unable to get a job to earn money or plan for their future.

In March 2024, The Children's Society supported the Home Office (HO) in co-launching its new plan to tackle financial exploitation – a form of criminal exploitation – with a focus on children who are forced into financial crime, from fraud to money laundering. We also supported the development of the HO guidance on financial exploitation.

The HO has acknowledged that financial exploitation is a form of CCE that poses a growing threat.²⁰ We urge Ofcom to also recognise this emerging threat and to ensure online service providers are held to account for the role their platforms play in facilitating the financial exploitation of children.

The HO guidance²¹ outlines how much of the financial exploitation taking place happens online. The guidance also promotes engagement between Government and the banking and financial sector to tackle this issue. We strongly believe that social media and online gaming companies should also be held to account and made to identify potential risks of financial exploitation, to prevent children from falling victim to financial exploitation. Currently, banks only identify financial exploitation has occurred after the fact, when the harm has been done. Online service providers and banks need Ofcom's support to ensure prevention work is taking place.

²⁰ [Money mule and financial exploitation action plan \(accessible\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118444/money-mule-and-financial-exploitation-action-plan-accessible.pdf)

²¹ [Money laundering-linked financial exploitation: guidance for frontline professionals \(accessible\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118444/money-laundering-linked-financial-exploitation-guidance-for-frontline-professionals-accessible.pdf)

Conclusion

As we have demonstrated above, ample evidence shows the significant role that online platforms play in facilitating child criminal exploitation. The proposed regulations to keep children safe online fail to recognise or address this link, and therefore fall short of ensuring children are protected from criminals seeking to exploit them for criminal purposes. Furthermore, the proposals fail to mention a form of criminal exploitation of growing concern: the financial exploitation of children. The proposed regulations fail to consider the offense of coercive controlling behaviour in the context of child criminal exploitation – it is only considered within the context of CSAE, even though this type of behaviour is a key tool used by perpetrators to criminally exploit children. We welcome how strong and comprehensive the proposed regulations are regarding CSAE. Child criminal exploitation should be included in these proposals, recognising that different forms of abuse and exploitation may happen concurrently, as CSAE and CCE so often do.

The Government and Ofcom have made clear their intentions to introduce regulations that will make the UK the safest place for a child to be online. These proposed regulatory measures do not entirely reflect the reality of some of the most insidious risks and harms that exist online. The online world is constantly evolving and dynamic in nature, and criminals seeking to circumvent the barriers put in place to thwart their criminal activities are endlessly adaptable. This challenging context necessitate an agile and responsive regulatory framework and enforcement regime, that has an ear to the ground and adapts to emerging and evolving challenges.

Appendix

Case study: Ace's experience as a victim of financial exploitation

When Ace was 15, he went into the care of the Local Authority for the first time. Ace was moved to a residential children's home in an area that they did not grow up in and had no connection to.

Ace had experienced neglect and trauma from an early age, and Ace's parents had overlapping support needs relating to substance misuse, mental health and domestic abuse.

Before going in to care the police had received multiple reports about Ace, ranging from anti-social behaviour, criminal damage and theft. The police reports concluded with 'no further action' and at this point child exploitation was not being considered, despite professionals knowing that Ace's parent had been making him steal items for them.

Ace made a disclosure to the carers at their home that they had been approached on Snapchat by somebody who had asked them to accept money into their bank account and to transfer the money to somebody else. They were told they would receive some money in return and were reassuring when Ace has questions about this all being legal and legit. Ace had then been asked to purchase high value goods online using credit card details he was given. Over time Ace was told these were stolen cards but only once he had begun using them.

Ace was sending the goods to his parents' home address and was frequently reported as missing by his carers. Police would often find Ace in his hometown. It was unclear how Ace was travelling there and how this was being funded.

The carers reported the disclosure of abuse to the police and social care and a referral was made to Action Fraud. The police did not feel the case met the threshold for further action. With Ace already in care social services didn't feel the situation was serious enough to need any further action.

The carers were not happy with this response and felt Ace needed more support and so referred him to The Children's Society.

The Children's Society accepted the referral and began working with Ace. Over months of working with him, Ace began to trust them and shared more of what had happened and his shame around having taken part in crime and that he had been fooled by the criminals who used him. He also shared that he had been threatened and felt he had no choice but to do what these people told him to and that they were still in touch with him and continuing to make these threats.

The Children's Society advocated on Ace's behalf to social care and the police and after initially meeting some resistance, were able to build relationships with these professionals. Through this and training The Children's Society provided them on financial exploitation, these professionals

began to take the situation more seriously and to work together with the carers to put a safety plan in place.

Alongside this practical support, The Children's Society also began working with Ace to explore and address the negative thoughts he had about himself, helping to build his self-esteem, increase his awareness of child exploitation and began work to help him understand his feelings about his parents and those who had exploited him.

Six months after first working with Ace and following new information regarding ongoing risk to Ace, The Children's Society successfully advocated for a strategy discussion to be convened, which proved essential in developing an action plan which included a 'no contact order' for Ace's parents, mapping which identified other children at risk and a referral to the National Referral Mechanism was made to better recognise Ace as a victim of child exploitation. The Children's Society were able to suggest safety and disruption measures and share good practice from other areas.

At the end of a year working with Ace, he felt more confident and better able to recognise child exploitation and the approaches that criminals use to groom young people online. He also felt better able to ask for help and where to go to receive this and was considering counselling to help in his journey of recovery after all he had been through. Professionals working with him also felt empowered to recognise the harm and abuse as financial exploitation and to advocate for an appropriate safeguarding response and had begun considering this for other young people they were working with. Professionals were also better connected across different organisations and teams and felt that multi-agency working had improved which was helping them better protect Ace and other children.

An NRM had also been submitted, which helped encourage the police to recognise Ace as a victim of crime and exploitation and is something that is often missed in cases of Child Financial Exploitation. It will also now help support the Home Office to better understand Financial Exploitation in the UK.

In the last meeting between Ace and his worker, Ace reflected that from the first time he met The Children's Society, he felt listened to and not judged and that this led him to feel able to talk about what he had been through and what was still going on. For the first time in a long time, he now felt safer.