Richmond and Wandsworth Safeguarding Adults Board

Multi-Agency Cuckooing Guidance

Date	April 2026
Next Review	September 2028

Acknowledgements: This document has taken content from the Camden Safeguarding Adults Board Guidance with their permission.

CONTENTS

1. Purpose 2
2. What is cuckooing? 2
3. Signs to look out for 3
4. The reasons why individuals may not report Cuckooing 4
5. What to do if you suspect a person is being cuckooed? 5
6. Multi-Agency Working 10
7. Prevention and moving forward 11
8. References 12
9. Legislation 12
Appendix 1: Definitions 13
Appendix 2: Contacts Information 15

1. Purpose

1.1. The purpose of this guidance is to provide information on how to identify signs of cuckooing and how to support people of all ages, 18 and over, who are at risk of cuckooing and may need statutory safeguarding. This guidance is intended for all staff within the London Borough of Richmond upon Thames and London Borough of Wandsworth, commissioners, health workers, housing staff, providers and contractors commissioned on behalf of the councils, and other partner agencies on the Richmond and Wandsworth Safeguarding Adults Board (RWSAB), such as the London Fire Brigade and voluntary sector agencies.

1.2. This guidance also aims to support partners to deal with cases involving cuckooing and be aware of other organisations or departments they may need to contact. This can include Adult Social Care, MASH, housing, community safety, mental health teams, and Police.

1.3. The words '*person alleged to be causing harm'* have been used throughout this guidance. Other services may refer to these persons as perpetrators, prosecuted offenders and gangs involved in cuckooing.

2. What is cuckooing?

2.1. Cuckooing is the practice of taking over a person's home, usually in order to establish a base for criminal activities. It is the term used when a person alleged to be causing harm uses the home of an adult at risk to handle cash proceeds of crime, to store and/or supply drugs, weapons or engage in other criminal activities, and is a form of criminal exploitation. It involves utilising the accommodation as a place to stay and involves safeguarding issues of coercion and control of the person, which may often begin under the guise of befriending. Victims are often left with little choice but to cooperate.

2.2. Adults who are at risk often have care and support needs, as outlined in the Care Act 2014, or may require an assessment of these needs. They can be an older person living alone, a person with physical or learning disabilities or a mental health condition. Adults with a substance misuse or criminal history can also be at risk, as well as individuals who are

socially isolated and lonely who look for friendship in any form. A person's ethnicity, gender, age or sexuality does not preclude or exclude them from risk.

2.3. The person alleged to be causing harm may gain access to the individual's home by befriending them, using coercion, or offering them free illegal drugs in exchange for using their home as a base for criminal activities. The person alleged to be causing harm may also use people to befriend the victim and become their partner. That person will then introduce their friends to the adult at risk and they may take over the property. A cuckooed address represents a significant risk to the individuals being cuckooed and to the wider community.

2.4. People alleged to be causing harm move around and may rotate through several properties (staying for short periods in each home and then moving on). The home may be used for a few hours, days or even longer in order for them to avoid detection by the Police.

2.5. Adults at risk may become homeless (or at risk of homelessness) as a result of people taking over their property or may be subject to enforcement action for breach of tenancy or licence from landlords. They may also be at risk of domestic abuse, financial abuse, sexual exploitation, modern slavery, violence, physical and psychological/emotional abuse.

2.6. Cuckooing is often linked to county lines. The term 'County lines' is used to describe when illegal drugs are transported from one area to another, often by children or adults at risk. Further information can be found in appendix 1.

2.7. Cuckooing can often also be linked to other forms of exploitation and crime such as mate crime, modern slavery and human trafficking. Further information can be found in the Modern Slavery pages for Richmond and Wandsworth. The person alleged to be causing harm may exploit both adults and children. Definitions can be found in appendix 1.

3. Signs to look out for

3.1. There are several potential signs/triggers to look out for and many of these are the same as other forms of exploitation and abuse. This is not an exhaustive list:

- The individual being isolated or withdrawn, which is uncharacteristic for them.
- Lack of funds and no food in the house.
- Change in behaviour such as being scared or an increase in drugs or alcohol misuse by the individual.
- Appears depressed or signs of self-neglect (unkempt).
- An increase in the number of vehicles visiting the property. This includes new vehicles or an increase in the number of taxis or hire cars.
- An increase in the number of people coming and going from the property, especially late at night and the early hours of the morning.
- Disengagement from support services, this can include a reduction in the number of health and social care workers visiting the individual.
- An increase in anti-social behaviour in and around the property.
- Sudden accumulation of rent arrears and other debts with no history of defaulting on payment.
- Individual may be in debt or start selling their items or have their utilities (gas/electricity) disconnected.
- Possessions in the property may become sparse.

- The individual may become involved in crime with no previous history of offending.
- The property may fall into an obvious state of disrepair.
- Other professionals visiting may be aware of unidentified people being in the individual's home.
- Other professionals visiting may be aware of people known to them, especially for criminality.
- Rehearsed statement – 'I am fine, no they are not using my property. They are my carers/friends'.
- The individual is working for free for the person alleged to be causing harm in order to repay a perceived debt.
- Repeat requests from the individual for e.g. repairs or complaining and then withdrawing the complaint.
- Complaints from neighbours regarding drugs and/or alcohol or anti-social behaviour
- Individual has previously been exploited.
- Upon visiting, the individual may speak to you with the door ajar (half closed) showing an urgency to end the conversation.
- Unexplained increase in new property, possessions, money or vehicles, where money may be appearing from unexplained sources.
- Not wanting to be at the property/not being contactable as potentially having a fear to return.

3.2. Signs of exploitation and abuse can be:

- Are they receiving more calls than normal?
- Are they carrying or selling drugs?
- Are they hanging out with someone that is older or younger than them and controlling?
- Do they have any unexplained injuries?
- Do they seem very reserved and like they have something to hide?
- Are they going missing from home or school?
- Unwillingness to allow entry to the property.
- Change in behaviour or attitude.
- Change in physical appearance.

3.3. It is important to remain curious, ask questions, be aware of the impact of trauma and coercion on what people say, and maintain a victim-centred approach.

4. The reasons why individuals may not report Cuckooing

4.1. There are various reasons why individuals may choose not to report cuckooing. This is not an exhaustive list.

- They may fear repercussions from the person alleged to be causing harm due to previous threats.
- Individuals may also fear being evicted due to offender activity taking place in their home (including anti-social behaviour).
- Individuals may fear that they will get in trouble with the Police. Section 8 of the Misuse of Drugs Act 1971 states that it is an offence "if an individual knowingly allows activities involving drugs in premises, they either live in or manage."

- The person alleged to be causing harm may also allow the individual to build up a drug debt, that they are unable to pay, leading to threats and violence and they are too afraid to seek help.
- The person could have made new friends but is unaware of their intentions and gain, or be lonely and experiencing social isolation, making them more vulnerable to exploitative befriending.
- The individual may be benefitting from the crime e.g., person alleged to be causing harm is providing them with free drugs or payment.
- The individual may have fluctuating capacity, impaired cognition, or a lack of capacity, as well as issues of coercion and potentially being under undue pressure from the person alleged to be causing harm.

5. What to do if you suspect a person is being cuckooed?

5.1. The use of professional curiosity, as well as knowing the signs to look for, is vital for the early identification of cuckooing and other forms of abuse, especially given the reasons that people may not report cuckooing. This curiosity is essential to support professionals to ask questions, challenge the information they receive or seek clarity, identify concerns and explore indicators of abuse, and make connections to enable a greater understanding of a person's situation and both their needs and risks.

5.2. If you suspect a person is being cuckooed **it is important to make a safeguarding referral to Adult Social Care – this can be done via the Council's website for Richmond, and for Wandsworth. If the individual is at risk of immediate harm, please contact the Police via 999.**

5.3. The person at risk must be asked for consent to make the safeguarding referral, unless doing so would put them further at risk. However, the London Multi-Agency Adult Safeguarding Policy and Procedures sets out the circumstances when professionals can reasonably override a lack of consent, where this was not possible or the person at risk is reluctant to give their consent to the sharing of safeguarding information. These include:

- where the adult lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the Mental Capacity Act.
- emergency or life-threatening situations which may warrant the sharing of relevant information with the emergency services without consent.
- other people are, or may be, at risk, including children.
- sharing the information could prevent a serious crime.
- a serious crime has been committed.
- the risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference (MARAC) referral.

Consideration of these circumstances must be documented, as well as any issues of capacity and the impact of undue influence and coercion, and a clear rationale given for deciding whether to override consent or not.

5.4. Partners and internal services, such as private sector housing services, can report safeguarding concerns under the Care Act 2014 using the safeguarding form on the Richmond or Wandsworth respective websites. If there are any children involved or living

at the property, please also report to the children's MASH team on via Achieving For Children in Richmond[1] and Wandsworth Children's Services[2]).

5.5. When determining the above will undertake several network checks, which may include contacting the following groups of people. This is not an exhaustive list:

- Other local authorities
- GP
- Community Nurse
- Hospital staff
- Police via 101
- Housing Services
- Community Safety
- Family/Friends
- Care agencies

5.6. The purpose of a Section 42.1 enquiry is to ascertain whether the individual:

- appears to have care and support needs (whether or not the local authority is meeting any of those needs),
- appears to be experiencing, or is at risk of, abuse or neglect,
- and as a result of those needs the individual appears to be unable to protect themselves against the abuse or neglect, or the risk of it.

5.7. If the individual meets these statutory criteria under the Care Act 2014, the safeguarding will move forward onto a section 42.2 enquiry. If they do not, a non-statutory enquiry could be considered where appropriate, or other actions such as a care needs assessment, referral to other agencies or to other risk management forums.

What steps will be taken by the Team managing the Safeguarding?

5.8. A planning discussion/meeting will be undertaken, which could involve a number of agencies involved in the person's life. The purpose of the meeting will be to ascertain who is responsible for what action. Where appropriate the individual who is being cuckooed will be invited to these and other meetings.

5.9. Assessment of the individual's mental capacity and their need for advocacy would also be considered. If required, referrals will be made for a Care Act advocate or Independent Mental Capacity Advocate. The Mental Capacity Act Code of Practice states that, while a person must not be treated as unable to make a decision merely because their decision is unwise, issues worthy of further investigation might include where 'somebody repeatedly makes unwise decisions that put them at significant risk of harm or exploitation or makes a particular unwise decision that is obviously irrational or out of character'. Another consideration is whether the person may be 'influenced by undue pressure' and the impact of coercion and intimidation on the decision-making of cuckooing victims should be explored. Where this may be the case, an application can be made to the High Court to request that it uses its inherent jurisdiction to intervene where somebody has capacity but

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[1] AfC Info website - Kingston and Richmond :: Community Information / Information and advice / Safeguarding and Child Protection / Single Point of Access (SPA)

[2] Make a referral to the Multi-Agency Safeguarding Hub (MASH) - Wandsworth Borough Council

may not be able to fully exercise their decision- making ability due to issues such as constraint, coercion, and undue influence.

5.10. Any discussions should look at mitigating risk to the individual concerned, such as, is it safe for the individual to remain in the property.

5.11. As part of the enquiry process it may be appropriate and necessary for professionals to conduct visits to the individual at the property. These visits should be carefully planned with the support of the Police and/or Housing Officer. Professionals need to ascertain the risk to the adult(s) and themselves when visiting the person's home. Professionals should consider having key words, which can be used to determine whether the adult is safe, or if it is safe for professionals to visit. Please refer to your organisations lone working and personal safety guidance for further information.

5.12. Where possible, risk assessments and safeguarding plans should be created with the support of the individual concerned and with multi-disciplinary input.

5.13. It is important that relevant partners minimise the risk of the person being identified. For example, by exploring other places to install key safes, asking care workers not to display their uniform, and not pressing other residents' doorbells to gain access into the estate or flat. Please contact Adult Social Care for guidance on key safe policies.

5.14. Further safeguarding meetings will be held as required to discuss the findings of the enquiry, agree further actions and safeguarding plans as required, and identify any lessons learned. This should involve all the agencies involved in the enquiry or in supporting the adult and where appropriate, the individual themselves and/or their advocate.

5.15. If an individual has been the victim of Cuckooing, it may be necessary to move them to temporary alternative accommodation, with their agreement, in the event that they are at immediate risk of harm. If they are a council tenant, Housing can provide temporary accommodation in an emergency or offer housing in another part of the borough to keep the individual safe.

5.16. <u>Management Transfer</u>

Neighbourhood housing officers can support existing social housing tenants to explore their options, including the possibility of applying for a management transfer. A management transfer is available for tenants who need to move from a situation of immediate risk. Moving a resident to an alternative property can be beneficial to curbing cuckooing. However, the resident must consent to the move and be able to cut ties with perpetrators to prevent the same situation occurring in the new property.

To ensure that the resident does not become a victim of similar abuse at their new property, a sensitive let can be considered. This would ensure factors such as location, can be considered during the lettings process. A Tenancy Support Officer (TSO) can be considered to support the resident moving into their new home, they can offer short to medium term interventions to assist tenants to establish their independence and fully manage their homes. The service is for existing tenants who have been identified as vulnerable and should be considered for victims of cuckooing. For more information, follow the Tenancy Support Service Procedure. The victim's history of abuse should be flagged up with the new Area Team, should the resident move to a different Team.

If the resident has a strong family support network, there is scope to explore alternative housing options. For example, it may be possible to move the tenant in with a family

member who can support their needs whilst ensuring they are not coerced back into criminal activity. However, this may not be a suitable long-term option, and, where possible, you should seek to rehouse the resident independently.

5.17. 'Stay Put Stay Safe' Scheme

It is only possible to move a resident into a new property with their consent. In some cases, the resident may express a desire to stay at their current property. In such circumstances, the housing officer can refer the tenant to the Temporary Accommodation team to consider their eligibility to the 'Stay Put, Stay Safe' Scheme. This scheme offers the person experiencing cuckooing the change to return to their home with added security measures installed at the Council's expense. Examples of security work range from a simple change of lock or fitting of a heavy-duty door to a safe room. Residents will be interviewed to determine their eligibility, will be offered options and a specific plan will be drawn up for their return to the former home in safety. Appropriate advice and referrals to specialist agencies and specific legal advice is also provided at the interview.

It may be possible to support the victim to remain in their property if this is their desired outcome and can be achieved safely, with the right support services and protection plan in place. Consideration should be given to the person's wishes and the impact of moving on their mental and physical wellbeing, balanced with the risk of further harm.

Additionally, those at risk of homelessness within 56 days or already homeless have the right to make a homelessness application, regardless of tenure. This is a statutory service, and the homeless initiative team will provide advice and guidance and complete assessments to determine if any statutory duty is required. Here are the web pages for Homelessness information in Richmond and in Wandsworth.

If someone is at risk and unsafe in their home due to cuckooing, the team could assess if they are homeless as a result or redirect them to their housing officer for support in exploring other options. Not all those who we have a homelessness duty to are also entitled to temporary accommodation. Referrers are encouraged to consider if the person is safe in the whole of the borough and if not, they could apply to any borough they are safe in with consideration of the dual costs, so need to consider how rents would be met on both properties.

5.18. The Community Safety Service seeks to address anti-social behaviour and reduce risk of harm across the borough, including incidences of Cuckooing, and will support Housing and other external housing providers in addressing such matters. The Community Safety Service works in conjunction with numerous partners, including the Police, Housing, NHS and Adult Social Care depending on the circumstances and will support appropriate interventions. For example, where a vulnerable tenant's property has been taken over, the lead agency will coordinate a multi-agency meeting with the relevant agencies to explore the most appropriate course of action, taking into consideration the safety of the individual and the wider community.

Occasionally it may be necessary to progress to legal enforcement in the form of a Closure Order, where the Police and the Council gather evidence to submit an application before a court to close a property and move the tenant to alternative accommodation. Community Safety often work with other housing providers, imparting advice and support to ensure that interventions are both timely and effective in reducing risk to victims and impact to the community.

5.19. Closure Orders

Closure orders may be issued as part of the resolution/enforcement stage. Closure orders are available to the Police and local authorities under the Anti-Social Behaviour, Crime and Policing Act 2014. Such powers allow premises, the use of which has or is likely to result in nuisance or disorder, to be closed quickly.

The decision to use the closure power should be based on the evidence or intelligence collected during an investigation into cuckooing. If there is sufficient evidence that cuckooing is taking place at a property and is causing nuisance or disorder, a closure notice may be issued. The effect of the closure notice is to create offences, backed with the power of arrest, for any persons who do not own or habitually reside at the property, who enter or remain in the premises. The intention is to require anyone other than the tenant/leaseholder and members of their household to leave and relief to be obtained during the notice period.

Following the issues of a closure notice, an application must be made to the magistrates' court for a closure order. The application must be heard within 48 hours of the closure notice being served. A closure order is an order prohibiting access to the premises for up to 3 months. It may prohibit access:

- By all people, except those specified, or those of a specified description;
- At all times, except those specified;
- In all circumstances; except those specified; and
- May be made for the whole or part of the premises and may include provision about access to part of the building.

This means it would be possible in an appropriate case to ask court to make an order allowing a vulnerable tenant/leaseholder access under certain conditions, such as no visitors between certain hours etc., to protect them and allow them to remain in their home while support services are put in place.

Once granted, a closure order closes a property completed for up to 3 months (and may be extended in certain circumstances for a further 3 months) and prevents access by any persons, even those with rights of abode or ownership (unless the order specifies otherwise). However, it does not end the tenancy. For more information on closure orders, please see Appendix 1: Definitions.

5.20. Absolute Ground for Possession

Following the closure of premises by the police or local authority, the Area Housing Manager must consider whether to pursue urgent possession proceedings with a view to repossessing the property within the closure period as the order does not end the tenancy. In some cases, the tenant may choose to surrender or end their tenancy by the way of Notice to Quit/Break Notice. Where the property has been closed for more than 48 hours under a closure order, the Area Housing Manager should decide whether to serve a notice relying on the 'Absolute Ground for Possession', where possession must be granted by the Court. The notice must be served within three months of the date when the closure order was made.

5.21. Applying for an Injunction

As an alternative to closure powers, an injunction can also be considered. Injunctions can be used to control who has access to the property and therefore may provide effective in preventing cuckooing. They can offer fast and effective protection for victims and can set

a clear standard of behaviour for perpetrators. An injunction can be given on the basis of ASB occurring at the property. There are two tests for an injunction depending on whether the ASB is 'non-housing' or 'housing'. For ASB in a housing contact, the nuisance and annoyance test will apply, that is:

Where the conduct is capable to causing nuisance or annoyance to a person in relation to that person's occupation of residential premises or the conduct is capable of causing housing-related nuisance or annoyance to any person.

This can be applied to instances of cuckooing where there is ASB as a result of illegal occupants, noise nuisance or drug dealing. The injunction has the power to exclude a perpetrator over the age of 18 from any premises or an area specified within the terms of the injunction. This could be used in a cuckooing case to prevent criminal from exploiting a household by using it as a base for drug dealing.

To apply for an injunction the South London Legal Partnership (SLLP) should be contacted.

5.22. When the safeguarding enquiry is concluded and the risk has been mitigated sufficiently, it is important that relevant partner agencies review the safeguarding plan and risks at regular intervals. Where a victim of cuckooing is returning to a property where the cuckooing took place, a multi-agency risk assessment should take place prior to their return with appropriate safety planning, and a protection plan put in place to prevent reoccurrence. This should be led by the agency leading on this transition or most likely to continue to have involvement, for example Housing where this relates to local authority stock. In circumstances where it is determined that it is not safe for the tenant to return to the property, then Housing Management should consult with Legal regarding issuing Mandatory Possession Proceedings. Other more suitable housing options should be considered.

5.23. Further information on Safeguarding Adults can be found on websites for Richmond and for Wandsworth.

6. Multi-Agency Working

6.1. Community Multi-Agency Risk Assessment Conference (CMARAC)

The Community Multi-Agency Risk Assessment Conference (CMARAC) is a monthly meeting where support agencies share information over issues to formulate joint responses. The remit of issues addressed at these meetings are those where:

1. There is repeat victimisation, and/or
2. There is severe or ongoing risk to particular persons, part of the community, or the community in general.

The person(s) referred may be a victim/perpetrator, at risk of/causing risk to themselves or others.

Cases referred may be deemed to be high risk under the *following criteria*:

1. Potential escalation – where there have been a number of incidents by the same perpetrator on the same victim in the last 6 months and they are increasing in severity or frequency.
2. Professional judgement – you as a professional consider the victim/perpetrator to be high risk (of serious harm or death – including self-harm and suicide).

3. Victim perception – the victims understanding of the risk including:
    a. Impairment that may limit mobility or capacity/learning difficulties.
    b. Mental health issues.
    c. Drug or alcohol misuse.
    d. Limited support network.

If it is decided that a referral is appropriate, the referring officer should complete the required referral form and sent this is the CMARAC Mailbox at CMARAC@richmondandwandsworth.gov.uk. The case remains on the agenda until the risk is reduced or removed. For more information, please see the CMARAC Terms of Reference.

6.2. Multi-Agency Risk Assessment Conference (MARAC)

If domestic abuse is a related factor in the case, then please follow the Domestic Abuse Procedure for how to risk assess and safeguard including making appropriate referrals to the Independent Domestic Violence Advocate (IDVA) service and MARAC in high-risk cases. For more information, please see the MARAC information on Richmond and Wandsworth websites.

7. Prevention and moving forward

7.1. It is important for partners and communities to identify adults in their local area who might be at risk of being targeted by criminals for the purposes of Cuckooing.

7.2. RWSAB partner agencies, including Housing and Community Safety, all need to work together in response to cases of Cuckooing. This is also a preventative approach as it helps to identify and put in place support for other adults at risk of being Cuckooed in the area.

7.3. Joint working in cases of cuckooing is essential. Community Safety work with private tenants and owner occupiers. The Housing team may also work with tenant and resident associations to support the local neighbourhood.

7.4. Where a young person may be a care leaver/looked after child or there are children involved, working together with Children's services is essential. to ensure appropriate joint working is in place for young people transitioning between services who may be at risk.

7.5. Providing the appropriate preventative services will minimise the risk of cuckooing occurring, such as the Drug and Alcohol Service, Community Safety, Mental Health services and voluntary sector services.

7.6. It is important that adults at risk have access to health and social care support services, which can support them effectively and make them less reliant on people who may offer informal support with their care and support needs as a way of befriending with criminal intent. This includes mitigating against social isolation and loneliness that can make people more at risk of this form of exploitation, befriending and coercion, and support with finding alternative forms of companionship and support networks.

7.7. Partners working with vulnerable or socially isolated people should consider the risks of cuckooing to the individual as part of their assessment and risk management strategies. It is important that risk is reviewed on a regular basis for individuals at risk of Cuckooing.

7.8. When services have supported an adult at risk with stopping criminal activity within their home it is important that communities and partnerships work together to prevent reoccurrence and support the individual where possible, with ongoing risk management plan and review, perhaps by developing community safety partnerships.

7.9. Raising awareness of cuckooing among residents and encouraging the reporting of concerns is essential, and all partners should consider how they can publicise this information in their respective areas. This could include through direct contact with residents, community events, media engagement, communications such as leaflets and existing newsletters, as well as through the partnership website and the work of the RWSAB Community Forums.

8. References

1. Criminal exploitation of children and vulnerable adults: County Lines guidance, Home Office, September 2018
2. London Multi-Agency Adult Safeguarding Policy & Procedures, April 2019.
3. Protecting Children from Criminal Exploitation, Human Trafficking And Modern Slavery: An Addendum, November 2018
4. Programme Challenger, Tackling Serious and Organised Crime Together, https://www.programmechallenger.co.uk/resources/cuckooing/
5. Housing Practice Guide - Premise Closures Order guidance

9. Legislation

1. Environmental Protection Act 1990
2. Anti-social Behaviour, Crime and Policing Act 2014
3. Housing Act 1996 & 2004
4. Care Act 2014
5. Modern Slavery Act 2015
6. Misuse of Drugs Act 1971

Appendix 1: Definitions

a. **An adult at risk** is someone aged 18 and over who:
   - has needs for care and support (regardless of whether these needs are being met by the local authority or not) and
   - is experiencing, or at risk of abuse or neglect.
   - As a result of those needs is unable to protect him or herself against abuse or neglect or the risk of it (Care Act 2014).

b. **Mate crime** – The Safety Net Project defines mate crime as "when adults at risk are befriended by members of the community who go on to exploit and take advantage of them." The London Multi-Agency Adult Safeguarding Policy and Procedures states 'mate crime is committed by someone the adult knows and often happens in private.'

c. **Modern slavery** is defined in the Modern Slavery Act 2015 as 'slavery, servitude and forced or compulsory labour'. It is a form of organised crime in which people are treated as commodities and exploited for criminal gain.

d. **Human trafficking** is defined in the Modern Slavery Act 2015 as 'the arranging or facilitating of another person's travel with the view of them being exploited by recruiting, transporting or transferring, harbouring or receiving a person or exchanging a person. Trafficking can include travel within the same country.'

e. **County lines** – The Home Office describes county lines as 'a term used to describe gangs and organised offender 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". They are likely to exploit children and adults with care and support needs to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons'.

   County lines exploitation is a major cross cutting issue involving trafficking, gangs, drugs, violence, safeguarding, criminal and sexual exploitation and missing persons. Gangs establish a base in the market location, typically by taking over the homes of local adults with care and support needs by force or coercion[3]. Further information can be found in the County Lines guidance by the Home Office.

   An inspection by Ofsted, the Care Quality Commission, His Majesty's Inspectorate of Constabulary and Fire & Rescue Services and His Majesty's Inspectorate of Probation[4] found that:

   'Children's travel may be 'arranged and facilitated by a person, with the view to them being exploited', which amounts to human trafficking according to section 2 of the Modern Slavery Act 2015. Children may then be forced to work for the drug dealer, often held in the adult at risk's home against their will and under the force of threat if they do not do as they are told. This meets the definition of 'slavery, servitude and forced or compulsory labour' in section 1 of the Modern Slavery Act 2015.

f. **Closure Order** - A Closure Order is an order which may be made by the Magistrates court on an application by the police or council to close a premises. The court may make a

[3] Criminal exploitation of children and vulnerable adults: County Lines guidance, Home Office, September 2018
[4] Protecting Children From Criminal Exploitation, Human Trafficking And Modern Slavery: An Addendum, November 2018

closure order if it is satisfied **a)** that a person has engaged, or (if the order is not made) is likely to engage, in disorderly, offensive or criminal behaviour on the premises, or **b)** that the use of the premises has resulted , or (if the order is not made) is likely to result, in serious nuisance to members of the public, or **c)** that there has been, or (if the order is not made) is likely to be, disorder near those premises associated with the use of those premises, and that the order is necessary to prevent the behaviour, nuisance or disorder from continuing, recurring or occurring.

A closure order is an order prohibiting access to the premises for a period specified in the order. The period may not exceed 3 months. A closure order may prohibit access **a)** by all persons, or by all persons except those specified, or by all persons except those of a specified description.

At any time before the expiry of a closure order, an application can be made to the magistrate's court to extend the closure order for a further 3 months. The period of a closure order may not be extended so that the order lasts for more than 6 months.

g. **Safeguarding** means protecting a person's right to live in safety, free from abuse and neglect.
   - A **Section 42.1 Enquiry** is initial information gathering when a concern about abuse or neglect is received, so the Local Authority can establish whether the person meets the criteria for a statutory safeguarding response under Section 42 of the Care Act 2014.
   - The statutory safeguarding duties apply to an adult who:
     - has needs for care and support (whether or not the local authority is meeting any of those needs)
     - is experiencing, or is at risk of, abuse or neglect
     - as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
   - A **Section 42.2 Enquiry** is where this criteria has been met and the Local Authority has a statutory duty to make (or cause to be made) whatever enquiries it thinks necessary to establish whether and what action needs to be taken to prevent or stop abuse or neglect.

Appendix 2: Contacts Information

Wandsworth Housing Area Managers

John Thompson (Eastern)	020 8871 7441
Anne Brown (Central)	020 8871 7050
Mark Hickey (Western)	020 8871 5502
Mark Bailey (Southern)	020 8871 7290

Wandsworth Housing Associations

(for more information please visit https://www.wandsworth.gov.uk/housing/private-housing/private-housing-tenants/housing-association-tenants/)

Registered providers

- a2dominion
- Abbeyfield
- Amiscus Horizon
- Anchor Housing Association
- Ekaya Housing Association
- L & Q (London and Quadrant)
- Metropolitan Housing
- New World Housing Association
- Notting Hill Housing
- Peabody
- Sanctuary Housing
- Stonewater (Raglan Housing Association)
- Threshold
- Wandle
- Womens Pioneer

Richmond Housing Associations

(for more information please visit https://www.richmond.gov.uk/services/housing/social_housing/housing_associations)

Registered providers

- A2Dominion
- Anchor Hanover
- The Guinness Partnership
- Inquilab Housing Association
- London & Quadrant Housing Trust

- Metropolitan Thames Valley Housing Association
- Network Homes
- Notting Hill Housing Group
- Orione Care
- PA Housing
- Places for People Homes Limited
- Richmond Housing Partnership Limited
- Shepherds Bush Housing Association Limited