

The Role of Civil Orders in Tackling Child Exploitation and Extra-Familial Harm.

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Executive Summary

Child exploitation—both criminal (CCE) and sexual (CSE)—is a significant and growing safeguarding challenge. Traditional responses have relied heavily on criminal prosecution, which often requires a high evidential threshold and can be slow to deliver protective outcomes. As exploitation becomes more complex and increasingly occurs outside the home—in communities, peer networks, and online—there is growing recognition that safeguarding agencies must adopt a broader toolkit. Disruption is central to this approach. This involves using civil orders, policing powers, and partnership interventions to restrict or manage offenders where criminal prosecution is not achievable.

In the past 20 years, a wide range of civil orders designed to prevent harm have been introduced. These include orders to tackle gangs, sexual offending, slavery and trafficking, acquisitive and violent crime and County lines drug dealing. These measures allow authorities to impose restrictions such as limits on association, travel, internet use, or communications devices, and may include positive requirements such as monitoring or participation in programmes. Their primary purpose is preventative: shifting the focus from proving past crimes to preventing future harm.

Despite the availability of these tools, national inspections and reviews repeatedly show that disruption tactics are under-used. Ofsted, HMICFRS, and the National Safeguarding Practice Review Panel have all highlighted limited partnership coordination and inconsistent application of available powers. Many practitioners lack familiarity with civil procedures, resulting in patchy adoption across the country and missed opportunities to intervene earlier against perpetrators.

The scale of the challenge underscores the need for more effective disruption. Thousands of children are identified annually as potential victims of exploitation, with significant numbers linked to organised crime networks such as county lines. Modern exploitation often involves grooming, coercion, trafficking, and manipulation that can make criminal prosecution difficult. Civil orders offer a way to manage risk where evidence may not yet support a conviction but clear safeguarding concerns exist.

This section of SAIL reviews several specific powers in detail. Sexual Harm Prevention Orders and Sexual Risk Orders can restrict sexual offenders and suspected predators, while Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk



Orders target modern slavery and trafficking risks. Gang injunctions and Criminal Behaviour Orders can address organised criminality and antisocial behaviour linked to exploitation. Drug Dealing Telecommunications Restriction Orders can disrupt county lines drug markets by disabling phones used to coordinate drug dealing. Additional tools—such as Child Abduction Warning Notices, premises closure powers, hotel guest-data requests, and Public Space Protection Orders—can disrupt environments where exploitation occurs.

The analysis in this section suggests that many of these tools remain under-used due to lack of awareness, insufficient training, and a lack of vision as to how partners can work together to make them effective. The best safeguarding practice involves a coordinated multi-agency approach, where police, local authorities, and other partners work together. This is an area where partners should look for opportunities to work cooperatively to apply disruption powers and share intelligence to use the powers available to them.

Ultimately, protecting children from exploitation cannot rely solely on prosecuting offenders. Safeguarding partnerships must build expertise in the use of civil orders and adopt more proactive and innovative disruption strategies. By doing so, authorities can intervene earlier, manage suspected perpetrators, and reduce the harm caused to vulnerable children and young people.



1. Introduction

- 1.1 Disruption is the practice of using civil orders and other mechanisms ¹ to enable the authorities to manage suspected perpetrators outside of the criminal justice process. These civil orders are designed to prevent offending through the imposition of restrictions such as forbidding foreign travel, controlling internet access, prohibiting association with specified people or places or the imposition of positive requirements such as wearing a tag or complying with drug treatment or anger management programmes.
- 1.2 They shift the focus from proving a crime to preventing harm, providing a flexible and robust framework to safeguard individuals or the wider public.
- 1.3 In addition to the direct oversight of offenders, disruption tactics can also include the management of particular places and or generic locations, through court orders, police restrictions or public health inspired information campaigns.

2. Civil Orders and Protecting Children through the Disruption of Offenders.

- 2.1 The exploitation of children outside the home is now better recognised than was the case historically. However, this improvement in recognition has not necessarily been accompanied by more effective action to tackle those who perpetrate the harm.
- 2.2 That is because the protection of children from exploitation—whether sexual (CSE) or criminal (CCE)—has tended to rely on the high-threshold pursuit of criminal convictions and that can be difficult.
- 2.3 The complexity of modern exploitation and the range of extra-familial harm that children can face (risks arising outside the home in communities, peer groups, or online), tends to outpace the criminal justice system.
- 2.4 Since 1999 (the introduction of the anti-social-behaviour orders), a wide range of civil orders designed to protect children and communities have been introduced through legislation. Although the police and local authorities, when consulted by

¹ The mechanism to manage offenders in this way derives from court issued orders and injunctions. These orders and injunctions are provided for both by the inherent jurisdiction of the Court to protect the vulnerable and also by a wide range of Acts of Parliament. In the case of some orders such as criminal behaviour orders, they can only be issued after a conviction. In the case of sexual harm prevention orders, any application for such an order needs to be made on the basis that the recipient of the order has a relevant criminal conviction, caution or has been subject to a finding of guilt notwithstanding his unfitness for trial due to insanity or disability.

legislators, have supported their introduction their use is patchy and the potential that they offer is not fully recognised.

3. Recognition that Safeguarding Partners Need to Do More

- 3.1 For too long there has been too little effective partnership work in tackling perpetrators through disruption. This is accompanied by a poor use and understanding of the legal and other tools available.
- 3.2 As far back as 2014, Ofsted's thematic inspection of local authority capacity and capability in dealing with child sexual exploitation found that there was patchy and low usage of disruption tactics and disruptive powers by both police and local authorities².
- 3.3 In their 2020 review of multi-agency effectiveness in safeguarding of children at risk of exploitation, *It was Hard to Escape*, The National Safeguarding Practice Review Panel said, "It is also of note that we heard virtually nothing about work to stop or disrupt the activities of the perpetrators of criminal exploitation"³ and among its key findings said, "More priority should be given to disrupting perpetrator activity"⁴
- 3.4 A more recent (2023) thematic inspection into the police approach to group-based child sexual exploitation had nine recommendations but only one Area for Improvement and that related to the use of disruptive activities to combat these crimes⁵. Chief Constables were instructed to work with their statutory partners to make effective use of the tools available which are described in the Home Office Toolkit⁶.

4. The Scale of Child Exploitation and Extra Familial Harm

- 4.1 The need for safeguarding partners to deploy every tool at their disposal should be obvious because the scale and range of child exploitation is considerable
 - 12,120 children are suspected of experiencing CSE⁷

² Accessed at https://assets.publishing.service.gov.uk/media/5a7e18b8e5274a2e8ab45d19/The_20sexual_20exploitation_20of_20children_20it_20couldn_E2_80_99t_20happen_20here_2C_20could_20it.pdf

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/870035/Safeguarding_children_at_risk_from_criminal_exploitation_review.pdf?utm_source=chatgpt.com para 5.4

⁴ Ibid page 9

⁵ Accessed at <https://hmicfrs.justiceinspectorates.gov.uk/publication-html/effectiveness-of-police-and-law-enforcement-response-to-group-based-child-sexual-exploitation/>

⁶ https://assets.publishing.service.gov.uk/media/63106669e90e076ebf7f419/Child_Exploitation_Disruption_Toolkit_082022.pdf

⁷ <https://explore-education-statistics.service.gov.uk/find-statistics/children-in-need-a-focus-on-sexual-abuse-and-exploitation/2025>



- 15,750 episodes of need where child criminal exploitation was identified as a concern⁸.
- There were 10,180 episodes of need where children being part of a street or organised crime gang was identified as a concern.⁹
- In 2023, 7,432 children were referred to the National Referral Mechanism (NRM) as potential victims of modern slavery, with the majority involved in criminal exploitation¹⁰
- 9877 county lines (both cross county (external) and within a county (internal lines)) are estimated to be operating¹¹

5. Civil Orders and Harm Prevention (A Brief History)

5.1 The Inherent Jurisdiction of the Court

- 5.1.1 There is a longstanding legal means of protecting the vulnerable. This is the inherent jurisdiction of the High Court. It is a residual, common law power to act as a safety net to make protective orders, such as injunctions, in cases where no specific statutory, legal, or procedural avenue exists.
- 5.1.2 It is not a limitless power and it can only be used in cases where there is no appropriate legal vehicle to provide the protection sought¹².
- 5.1.3 One of the most striking examples of the court using its power to protect children arose in 2014 when Birmingham City Council, having no other legal means available asked the court to use its inherent jurisdiction and obtained injunctions against seven men who were suspected of sexually exploiting a 17-year-old girl who was in council care¹³
- 5.1.4 Such is the range of orders now available to those seeking to protect children it seems unlikely that a local authority would need to resort to this tactic again.

⁸ <https://explore-education-statistics.service.gov.uk/find-statistics/children-in-need/2025>

⁹ Ibid

¹⁰ <https://antislaverycommissioner.co.uk/media/bp0flhtg/child-trafficking-report-2024.pdf>

¹¹ <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2025/county-lines-strategic-threat-risk-assessment-fy-2024-25.pdf>

¹² See sec 100 Children Act 1989; here this limitation is described.

¹³ Birmingham City Council v Riaz & Others [2014]



5.2 A Proliferation of Orders

5.2.1 That is because since 1998 around 33 different civil orders¹⁴ have been made available to the authorities to enable the management of crime, anti-social behaviour and safeguarding risk .

5.2.2 The following are the most relevant orders that could be deployed in child exploitation cases to manage suspects. The year that they were introduced is in brackets.

- Gang Injunctions (2009)
- Criminal Behaviour Orders(2014)
- Sexual Risk Orders (2014)
- Sexual Harm Prevention Orders (2014)
- Slavery and Trafficking Prevention Orders (2015)
- Slavery and Trafficking Risk Orders (2015)
- Drug Dealing Telecommunications Restriction Orders (2017)

5.2.3 Anti-Social Behaviour Injunctions introduced in 2014 could be deployed as a disruption tactic but they are due to be replaced by Respect Orders in 2026.

5.2.4 Two orders that relate to the prevention of violence and particularly knife crime that exist on the statute book but are not currently available in London.

- Knife Crime Prevention Orders (2019)¹⁵
- Serious Violence Reduction Orders (2022)¹⁶

5.2.5 Two further orders are proposed in the Crime and Policing Bill

- Child Criminal Exploitation Protection Orders¹⁷
- Respect Orders ¹⁸

¹⁴ <https://publications.parliament.uk/pa/cm5901/cmpublic/CrimePolicing/memo/CPB119.htm>

¹⁵ This order is on a statutory footing but is not currently available as a power. A 14 month pilot in the MPS has concluded (March 2023) but the Government has not yet enacted the appropriate section of the Offensive Weapons Act to make this power available generally and the pilot power has lapsed.

¹⁶ Although this order is on a statutory footing , it is currently only available in four pilot police forces outside of London and will only become available country wide following an independent assessment of its use in the pilot areas. This may be in 2026.

¹⁷ The child criminal exploitation preventative order

¹⁸ The Respect Order

5.2.6 As well as civil orders targeted at particular suspects there are other orders and legal mechanisms which disrupt exploitation through the management of places and spaces.

5.2.7 This large number of orders creates a problem. While their aims are similar, namely preventing harm and protecting the vulnerable there is variation in

- who can apply for an order,
- which court can issue the order
- whether positive requirements as well as restrictions can be imposed
- how long the orders can last
- what is the minimum age of the subject of such an order
- whether powers of arrest exist for all breaches.
- what the impact of a breach might be.

5.3 Expertise and Familiarity

5.3.1 There is a lack of expertise and confidence among staff in dealing with these orders and so it is no surprise that many of them are deployed rarely, if at all.

5.3.2 The history of many of these orders is that there is or may be some adoption of their use when there is organisational momentum and central government support, but after a while their use tends to fall away.

6 The Civil Order Toolkit

6.1 In 2019 the Home Office published its Child Exploitation Disruption Toolkit¹⁹ It contains advice on how partners should develop a local problem profile, adopt a solution focused mindset and build a multi-agency partnership underpinned with effective information sharing.

6.2 Making Life Harder for Suspects

6.2.1 The next section deals with a number of relevant civil orders that could be deployed to protect children from harm through the disruption of those who might seek to harm them.

¹⁹ https://assets.publishing.service.gov.uk/media/63106669e90e076ebfb7f419/Child_Exploitation_Disruption_Toolkit_082022.pdf

7. Gang Injunctions

7.1 Gang Injunctions are provided for under the Part 4 of the Policing and Crime Act 2009. Originally, they were designed to target gang related violence , but in 2015 the Act was amended to include gang related drug dealing. In 2016 the Home Office published its statutory Gang Injunction guidance²⁰

7.2 The purpose

- To prevent someone who must be at least 14 years old from engaging in, assisting with or encouraging gang related violence or gang related drug dealing or
- To protect someone who must be at least 14 years old from gang related violence or gang related drug dealing²¹.

7.3 Who can apply?

- The local police
- The British Transport Police
- The Local Authority (County, District, Borough or Unitary)
 - The Police must consult with the Local Authority (and vice versa) before making an application and if the subject is under 18 the youth offending team must also be consulted.
 - Any other relevant body may also be consulted.

7.4 The court

- For adults, the County Court or in serious cases, the High Court.
- For children aged 14-17, the Youth Court

7.5 What is a gang?

- A group of at least three people
- Has one or more characteristics that enable others to identify its members as a group

7.6 What orders can the court make ?

²⁰ https://assets.publishing.service.gov.uk/media/5a7f1bfee5274a2e87db3d9b/Statutory_Guidance_-_Injunctions_to_Prevent_Gang-Related_Violence__web_.pdf

²¹ This “power” has been used only rarely – one of the best publicised examples being the injunctions obtained by Thurrock Council against the C 17 gang in 2018 (reported at <https://democracy.thurrock.gov.uk/documents/s22509/Gang%20Related%20Violence%20Update%20Report.pdf>)

The court can with its order

- prohibit the respondent from doing anything described in the injunction;
- require the respondent to do anything described in the injunction.

7.7 Powers of arrest

- The Court can apply at the outset a power of arrest to any prohibition or requirement (except for a requirement for the respondent to take part in any activity²²).
- A Constable may arrest without warrant the person subject of the injunction if he believe that he has breached the terms of the injunction.

7.8 Effectiveness and adoption of the Power

7.8.1 In 2014 the Home Office, prior to expanding the reach of gang injunctions to cover drug dealing as well as violence conducted a review of how effective they had been in tackling gang violence. They found that in the previous five years only 88 had been obtained. 46 of those had been obtained by one individual acting for Merseyside Police Force in partnership with the local council.

7.9 Since then there has been no further review of gang injunctions, despite their expanded remit in 2015 so as to include drug dealing. In 2021 Merseyside Police were commended for their use of the tactic by HMICFRS, but aside from that there is no obvious public mention of their use in HMICFRS literature.

7.10 The NPCC County Lines Strategy (2024-2027) which aims

“To go after criminals (which includes urban street gangs) using all available legislation”²³

does not mention gang injunctions at all.

7.11 In 2017 the Mayor of London was asked about the use of gang injunctions in London and he replied that at that time there were ten in existence²⁴, but that the MPS preferred to deploy Criminal Behaviour Orders (CBO) as a breach of a CBO was a criminal offence.

²² The rationale for this is that if a respondent is required by the injunction to participate in a drug rehabilitation course which comprises 12 sessions, but misses (say) two sessions or attends but fails to participate fully the question of whether he has broken an injunction condition is less binary than simply disobeying a prohibition (such as going somewhere or contacting someone he shouldn't).

²³ <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/disrupting-county-lines-policing-strategy-2024-to-2027.pdf>

²⁴ <https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/gang-injunctions-0>

7.12 While it is true that, unlike all the other orders described in 4.2.2, the gang injunction is the only one that does not attract a criminal conviction, the impact on the offender of breaching a gang injunction is little different from breaching a CBO. Breaching a gang injunction can attract a sentence of two years custody for contempt of court for an adult²⁵, and three months detention for a child²⁶ while the sentence for the most serious breach of a CBO under sentencing guidelines is set at a maximum of two years.²⁷

7.13 It is equally as likely that the reluctance to use gang injunctions is to do with unfamiliarity with civil procedures.

7.14 Analysis and Recommendation

- Gang injunctions could be a powerful tool in the hands of safeguarding partners if they chose to use them. Unlike a CBO no conviction is required, the burden of proof for both obtaining them and convicting a suspect of a breach is on the balance of probabilities¹.
- In order for their use to make the difference that the legislation intended, safeguarding partners need to develop a strategy for their use, communicate that to their staff and equip them to develop the appropriate level of skill they need to be familiar with it as a tactic.

8. Sexual Harm Prevention Orders and Sexual Risk Orders (SRO)

8.1 This section deals with two related orders which can protect children from sexual exploitation. Both are provided for by the *Sexual Offences Act 2003*. They represent a robust tools for disrupting sexual predators. These orders have been in existence for some time but both were strengthened by the Police, Crime, Sentencing and Courts Act 2022. There is a lengthy guidance document covering these issues published in 2023 by the Home Office.²⁸

8.2 Sexual Harm Prevention Orders (SHPO)

²⁵ Sec 14(1) Contempt of Court Act 1981

²⁶ The maximum sentence for a child is 3 months detention (Anti-social Behaviour, Crime and Policing Act 2014 (Section 12 and Schedule 2

²⁷ <https://sentencingcouncil.org.uk/guidelines/breach-of-a-criminal-behaviour-order/>

²⁸ Accessed at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1148607/Part_2_Guidance_March_2023_FINAL_3003.pdf

8.2.1 These are provided for in The Sexual Offences Act 2003 (sec 103A) and the Sentencing Act 2020 (sec 345)

8.2.2 *The purpose*

- protecting the public or any particular members of the public from sexual harm from the defendant, or
- protecting children or vulnerable adults generally, or any particular children or vulnerable adults, from sexual harm from the defendant outside the United Kingdom.

8.2.3 *Who can apply and when?*

- On conviction the Crown Court or Magistrates Court can make an order automatically without an application being made²⁹.
- In cases where it is suspected that someone poses a risk of sexual harm (a qualifying offender) , an application can be made to a magistrates' court to achieve the purpose described in 5.4.2³⁰.
- The people who can make this application are the Local Police , the British Transport Police, The Ministry of Defence Police , The National Crime Agency.

8.2.4 *Who Can be the subject of such an order?*

- Anyone upon conviction for an offence included in schedule 3 of the Sexual Offences Act (clear sexual offences)³¹
- Anyone upon conviction for an offence in schedule 5 of the Sexual Offences Act.
 - This is list of 173 different offences any one of which might be accompanied with a sexual element e.g., child abduction
- Any qualifying offender on a stand-alone application
 - This is someone who has behaved in way that suggests that he poses a sexual risk and already has previously been convicted or cautioned for an offence listed in schedule 3 or schedule 5.

8.2.5 *What orders can the court make*

The court can with its order³²

- prohibit the respondent from doing anything described in the order;

²⁹ Sec 345 Sentencing Act 2020

³⁰ Sec 103A(3) Sexual Offences Act 2003

³¹ Although not required to do so, the Court may ask the prosecution or the probation service in their presentence report to comment on the utility and terms of an intended SHPO.

³² In 2020 Kelly and Picton wrote an article in the Criminal Law Review describing the Courts approach to the imposition of a SHPO; namely necessity, clear and achievable terms, non-oppressive terms and tailored to the facts of the case.

- require the respondent to do anything described in the order (e.g., take a polygraph test, be subject to electronic monitoring)

8.2.6 *How long does the order last*

- The order lasts for a minimum of five years, but can be longer. The court can impose different time spans on different requirements and prohibitions, but none can last for less than 5 years³³.

8.2.7 *Powers of arrest*

- The order is breached if someone
 - Does something prohibited by the order
 - Fails to do something required by the order

And the power of arrest for the breach is the same as for any criminal offence.

8.2.8. *Extent and effectiveness of Sexual Harm Prevention Orders*

8.2.9. There is probably a significant difference between the numbers of SHPOs issued directly by courts on conviction and those issued as stand-alone orders, however the data on this difference is not published.

8.2.10 What we do know is that last year the Ministry of Justice reported that 7221 SHPOs were issued in cases that were then overseen by the MAPPA process³⁴. Of these 559 were issued in London³⁵. It is likely that the significant majority of these SHPOs were issued on conviction.

8.2.11 There has been little by way of formal review of the effectiveness of SHPOs although the most recent MAPPA annual report (footnote 26) records 78 offenders receiving custodial sentences for breaching the terms of a SHPO. Whether this figure reveals a high degree of compliance or a low level of enforcement only further research could tell.

8.2.12 With each SHPO lasting at least 5 years , the aggregate total of active SHPOs although not published centrally, must be very large.

8.2.13 The Metropolitan Police following an FoI request reported that in August 2024 there were 4720 active SHPOs in London.³⁶

³³ Sec 347 Sentencing Act

³⁴ Accessed at <https://www.gov.uk/government/statistics/multi-agency-public-protection-arrangements-mappa-annual-report-2024-to-2025> table 6

³⁵ Accessed at

https://assets.publishing.service.gov.uk/media/69032d5cfabc9f10a832a81d/London_MAPPA_Annual_Report_2024_to_2025.pdf

³⁶ Accessed at https://www.met.police.uk/foi-ai/metropolitan-police/disclosure-2024/august-2024/registered-sex-offenders-sexual-harm-prevention-orders-2020-2023/?utm_source=chatgpt.com

8.2.14 This ever-increasing number of SHPOs being issued each year (up by 91% since 2014) has lead to some debate about whether this can be an effective tactic for reducing harm. The Sentencing Academy³⁷ recently published a review of SHPOs and found a lack of evidence as to their effectiveness.

8.2.15 Obtaining such evidence would be difficult as it would require a lengthy randomised control trial, where qualifying offenders would randomly have to receive a SHPO or not with their subsequent offending being tracked through data and focused interviewing.

8.2.16 The study itself would be lengthy and complex. Additionally It is hard to see how the Police or a court would decide not to apply for or issue a SHPO in order to facilitate academic research if the evidence suggested that a SHOPO could protect the public.

8.2.17 Analysis and Recommendations

- There is a lot of scope for partners to use SHPOs to disrupt the behaviour of perpetrators who are convicted of sexual offences or other offences which have an implied or associated sexual element. Currently many SHPOs are handed down by the sentencing court with too little thoughtful input from safeguarding partners.
- Although the ability to apply for an order sits with the police, a partnership approach to making appropriate applications could strengthen disruption tactics.
- The MPS should keep data on whether a SHPO has been issued on conviction or as a standalone (disruption) order

8.3 Sexual Risk Orders

8.3.1 These are provided for in sec 122A ff The Sexual Offences Act 2003. They operate in much the same way as SHPOs; the principal difference being that for one to be applied to an offender he does not need to have previously acquired a conviction or a caution for an offence; and so it truly is a disruption order.

8.3.2 The purpose

³⁷ A charity committed to understanding the effects of sentencing in criminal courts on society.

- protecting the public or any particular members of the public from sexual harm from the defendant, or
- protecting children or vulnerable adults generally, or any particular children or vulnerable adults, from sexual harm from the defendant outside the United Kingdom

8.3.3 *Who can apply and when?*

- The people who can make this application are the Local Police , the British Transport Police, The Ministry of Defence Police , The National Crime Agency.
- Applications are made at the Magistrates court for adults and the youth court for defendants under 18 years old.

8.3.4 *Who Can be the subject of such an order?*

- Someone who has done an act of a sexual nature as a result of which there is reasonable cause to believe that it is necessary for a sexual risk order to be made

8.3.5 *What orders can the court make*

The court can with its order

- prohibit the respondent from doing anything described in the order;
- require the respondent to do anything described in the order (e.g., take a polygraph test, be subject to electronic monitoring)

8.3.6 *How long does the order last*

- The order lasts for a minimum of two years, but can be longer. The court can impose different time spans on different requirements and prohibitions, but none can last for less than 2 years³⁸.

8.3.7 *Powers of arrest*

- The order is breached³⁹ if someone
 - Does something prohibited by the order
 - Fails to do something required by the order

8.3.8 And the power of arrest for a breach is the same as for any criminal offence. A breach is an offence triable either way and on conviction subject to a maximum of 5 years imprisonment.

³⁸ Sec 122A(8) Sexual Offences Act 2003

³⁹ Sec 122 H sexual Offences Act

8.3.9 *Extent and Effectiveness of Sexual Risk Orders*

8.3.10 They are much less prevalent than SHPOs although because there is no central mechanism for collecting data on them. What we know of their use needs to be pieced together from a variety of dispersed sources.

8.3.11 In 2023 the MPS in response to an FOI reported that in the previous three years they had applied for and been granted a total of 59 orders⁴⁰

8.3.12 The most recent MAPPA annual report⁴¹ records that in 2024, 118 people were convicted of breaching a SRO an increase of 42% on the previous year.

8.3.13 A Cambridge⁴² desk top review of the effectiveness of SROs at reducing risk concluded that the imposition of the order reduced sexual harm by between 84% and 93%

8.3.14 *Analysis and Recommendations*

- There is scope for partners to use SROs to disrupt the behaviour of perpetrators who have not been convicted of a sexual offence but whose behaviour on a balance of probabilities is considered to pose a sexual risk to others.
- As with SHPOs the ability to apply for an order sits with the police, but a partnership approach to making appropriate applications could strengthen disruption tactics.
- The MPS should keep data on whether an SRO has been issued and whether and to what extent it has achieved its protective aims.

9. *Slavery and Trafficking Prevention (STPO) and Risk Orders (STRO)*

9.1 These are similar in construction to SHPOs and SROs. STPOs like SHPOs can be issued by the court on conviction or can be applied for as a stand-alone order if the defendant has a relevant conviction. STROs, like SROs can be made against defendants with no relevant conviction but whose behaviour is found by the court to be likely to lead to him committing a slavery or trafficking offence.

⁴⁰ <https://www.met.police.uk/foi-ai/metropolitan-police/disclosure-2023/august-2023/sexual-risk-orders-applied-mps-january2021-july2023/>

⁴¹ Accessed at https://assets.publishing.service.gov.uk/media/69032d5cfabc9f10a832a81d/London_MAPPA_Annual_Report_2024_to_2025.pdf

⁴² Accessed at <https://link.springer.com/article/10.1007/s41887-024-00097-6>

9.2 These orders which are similar to each other are provided for in sec 14-22 (STPOs) and 23-29 (STROs) Modern Slavery Act 2015.

9.2.1 *What constitutes slavery or trafficking?*

9.2.2 Slavery, servitude and forced or compulsory labour and human trafficking are criminal offences. Trafficking includes recruiting, transporting or harbouring a person for exploitation, including sexual, criminal or labour exploitation. The Act has specific safeguarding relevance for adolescents: where a child is trafficked, proof of coercion is not required. The Act also provides for Independent Child Trafficking Advocates to support and safeguard affected children, reinforcing local authority and multi-agency child protection duties.

9.2.3 In the context of county lines, and a range of other illegal activities where children are compelled to perform tasks for others these orders could offer disruption opportunities to tackle offenders.

9.2.4 *The reason for issuing either order*

- there is a risk that the defendant may commit a slavery or human trafficking offence, and
- it is necessary to make the order for the purpose of protecting persons generally, or particular persons, from the physical or psychological harm which would be likely to occur if the defendant committed such an offence.

9.2.5 *Who can apply and when*

- On conviction the Crown Court or Magistrates Court) can make an order automatically without an application being made. **(STPO)**
- In cases where it is suspected that someone poses a risk of committing a slavery or trafficking offence (a qualifying offender) , an application can be made to a magistrates' court to issue an order if the conditions described in 8.2.4 pertain. **(STPO)**
- In cases where it is suspected that someone poses a risk of committing a slavery or trafficking offence but is not a qualifying offender, an application can be made to a magistrates' court to issue an **STRO** order if the conditions described in 8.2.4 pertain.
- The people who can make an application for either order are the Local Police , an immigration officer, The National Crime Agency and the Gangmasters Licensing Authority.

9.2.6 *Who Can be the subject of such an order?*

- Anyone upon conviction for a slavery or trafficking offence (**STPO**)
- Any qualifying offender on a stand-alone application
 - This is someone who has previously been convicted whether in the UK or abroad for a slavery or trafficking offence and whose behaviour is such as to suggest that he will commit a slavery or trafficking offence (**STPO**)
- Any other offender, who does not have a relevant conviction, but whose behaviour is such as to suggest he will commit a slavery or trafficking offence. (**STRO**)

9.2.7 *What orders can the court make?*

The court can with its orders

- prohibit the respondent from doing anything described in the order;
- require the respondent to surrender his passport
- require the respondent to provide up to date details of all his names and his address.

9.2.8 *How long does the order last?*

- An STPO lasts for a minimum of five years, but can be longer and an STRO lasts for a minimum of two years. The court can impose different time spans on different prohibitions, but none can last for less than 5 years (STPO)⁴³ or two years (STRO)⁴⁴

9.2.9 *Powers of arrest*

- Both orders are breached if someone
 - Does something prohibited by the order
 - Fails to do something required by the order⁴⁵

9.2.10 And the power of arrest for the breach is the same as for any criminal offence.

9.2.11 *Extent and Effectiveness of Slavery and Trafficking Prevention and Risk Orders*

9.2.12 The data on the use of these orders is not collected or published separately. The most recent research on this was published by Nottingham University in 2023⁴⁶. Its trawl of available data supplemented by Freedom of Information requests revealed

⁴³ Sec 347 Sentencing Act

⁴⁴ Sec 24 Modern Slavery Act

⁴⁵ Sec 30 Modern Slavery Act 2015

⁴⁶ https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2023/september/slavery-and-trafficking-risk-and-prevention-orders.pdf?utm_source=chatgpt.com

that in 2022 there were 250 orders in existence in England and Wales, the vast majority of which were STPOs and between 2017 and 2021, 28 people had been convicted of breaching one or other of the orders.

9.2.13 In “Disrupting County Lines”, the NPCC 2024-2027 strategy it is reported that between April and July 2024, 23 orders were obtained

9.2.14 Unlike most other civil orders available to safeguarding partners these orders only allow for prohibitions, so positive requirement conditions such as wearing a GPS tag or being required to undertake a drug referral programme are not available.

9.2.15 Analysis and Recommendations

- Given the extent of county lines in London, the relatively low use of STPO and STRO is slightly surprising. The National County Lines Coordination Centre help in developing expertise in the application for and management of orders.
- Part Four of the Crime and Policing Bill¹ includes a new civil order designed to protect children from criminal exploitation. Should that legislation be passed then for the purposes of protecting children from slavery and trafficking in a county lines context these orders will be able to replace STPO and STRO orders.
- Until that happens safeguarding partners should find a way of developing expertise at a partnership level to make better use of these orders when they could offer protection to victims and cause disruption to perpetrators

10 Criminal Behaviour Orders

10.1 These were created originally in the Anti-Social Behaviour, Crime and Policing Act 2014 but for practical purposes now described and defined in sec 330 – 342 Sentencing Act 2020.

10.2 The purpose

- preventing an offender from engaging in behaviour that might cause any person harassment, alarm or distress.

10.3 What constitutes harassment alarm or distress



10.3.1 Although these orders were created by the Anti-Social Behaviour Crime and Policing Act, the offence for which the offender is convicted does not need to “look like” a crime of anti-social behaviour. What is important is the impact of the offender’s behaviour on another person. It simply needs to be a crime which has caused or is likely to have caused someone harassment, alarm or distress.

10.3.2 Many crimes would have that tendency and what the court needs to consider and the prosecution needs to present as an argument is that on the occasion of the offence or on some other occasion the offender has used such behaviour and an order would have the impact of preventing such behaviour having a similar impact on others.

10.3.3 A wide range of offences can give way to these orders. One that illustrates their wide applicability is a case involving a bogus trader who defrauded a vulnerable victim. He was made subject to a three-year CBO preventing him from soliciting any business related to gardening or building services⁴⁷, an order upheld by the Court of Appeal.

10.4 *Who can apply and when?*

- On conviction if the prosecution makes an application to the Crown Court, Magistrates Court or Youth Court the sentencing court can make an order.

10.5 *Who Can be the subject of such an order?*

- Anyone upon conviction for an offence, about which the court is satisfied⁴⁸ has involved behaviour that has caused (or might have caused) someone harassment alarm or distress.

10.6 *What orders can the court make*

The court can with its order⁴⁹

- prohibit the respondent from doing anything described in the order;
- require the respondent to do anything described in the order

10.7 *How long does the order last*

- The order lasts for a minimum of two years, but can be longer in the case of an adult. In relation to someone under 18 ⁵⁰ the order must be in place for a minimum of 12 months but cannot last for more than three years. The court can

⁴⁷ Regina v Janes accessed at <https://www.casemine.com/judgement/uk/5a8ff70d60d03e7f57ea6c8f>

⁴⁸ In the Anti Social Crime and Policing Act , the test here was beyond all reasonable doubt , but the Sentencing Act replaced that standard with the lower civil burden of proof.

⁴⁹ Sec 330 Sentencing Act

⁵⁰ In imposing an order on someone under 18 the court must consult with the Youth Offending Team.

impose different time spans on different requirements and prohibitions, but none can last for less than two years (for an adult) or 12 months for someone under 18.

10.8 Powers of arrest

- The order is breached if someone
 - Does something prohibited by the order
 - Fails to do something required by the order

And the power of arrest for the breach is the same as for any criminal offence.

10.9 Extent and Effectiveness of Criminal Behaviour Orders

10.9.1 As with most civil orders, there is little regular collection or publication of data, so there is sparse evidence to demonstrate how well these orders work in preventing crime or causing offenders to desist.

10.9.2 On 9th October 2025 in response to a Parliamentary question the MoJ released data⁵¹ on the numbers of CBOs issued in England and Wales 2000-2024. During these years nationally numbers rose 271% from 900 to 3323 and in London over the same period the numbers rose 25% from 270 to 339.

10.9.3 This significant increase nationally was driven by nine forces⁵² recording very large rises in their use over this period, while most other forces increased their use little and, in some cases, not at all.

10.9.4 The majority of this rise was in cases involving older males (over 24). In 2020 the proportion of CBOs issued against people under 24 was 30% of all CBOs , in 2024 it was 15%.

⁵¹ Accessed at <https://questions-statements.parliament.uk/written-questions/detail/2025-10-10/78742>

⁵² Avon and Somerset, Cambridgeshire, Essex, Greater Manchester, Hertfordshire, Merseyside, South Yorkshire, Sussex and West Yorkshire

10.9.5 Analysis and Recommendation

- The wide fluctuations in use across age ranges and geographies show that local leadership plays a major part in determining the extent of their use.
- The CBO is a flexible order and could be used in a wide range of cases which relate to adolescent safeguarding. It seems from the data that London has not changed its approach to their use in the past five years but may want to.
- In Havering there is an example of a new approach to drug related shoplifting conducted through the work of a multi-agency CBO panel. The Local Authority, the Police, the Health Service and other partners cooperate to use CBOs in a way that seeks in a nuanced way to prevent crime and protect the public*.
- To get the most out of the use of CBOs those in London who have responsibility for reducing the harm caused to adolescents outside the home should encourage the local development of a range of multi-agency approaches to their use

*<https://www.college.police.uk/support-forces/practices/criminal-behaviour-order-panel>

11. Child Abduction Warning Notices (CAWNs)

11.1 A CAWN is not a court order. It is a notice served on an adult by the police, stating they do not have permission to associate with a specific child. It anticipates the defences the adult might make that either he believed the child to actually be an adult or that he believed that the child was with him with the knowledge of those able to give permission.

11.2 A CAWN is served on suspects who are believed to present a risk to children committing

- abduction of child by other persons where the child is under 16 years of age⁵³
- abduction of children in care where the child is under 18 years and in local authority care⁵⁴.

- Children are in care of the local authority if;

- i. they are subject of a care order made by the family court,

⁵³ Section 2 Child Abduction Act 1984

⁵⁴ section 49 (1) Children Act 1989

- ii. they are subject of an emergency protection order
- iii. they are in police protection⁵⁵.

- They are not in care for the purposes of this legislation if they are accommodated under a voluntary agreement⁵⁶ because parental responsibility has not been transferred to the local authority.

11.3 Because a CAWN has no legal basis it is a disruptive tool used at police discretion. Breaching it is not itself an offence, but it provides an opportunity to build an early case against adults who groom and exploit children.

11.4 The College of Policing has issued comprehensive guidance of the use of CAWNs to protect children.⁵⁷ While CAWNs are currently served exclusively by the police, that does not need to be the case. In a partnership context this could be a shared responsibility.

11.5 It may be that in some circumstances the local authority has better intelligence about a child they are looking after and the adults they are associating with and could act quicker. As with other orders and disruption tactics it makes sense to have a partnership approach to the application of this tactic.

11.6 *Extent and Effectiveness of CAWNs*

11.6.1 As this is a process that is not underpinned by any law there is no routine central recording of the extent of their use. The data available for London has to be gleaned from a range of sources; namely Freedom of Information requests and other sources.

11.6.2 In December 2018 the Mayor was asked a question about the use of CAWNs in London and he said that in the previous 12 months 318 notices had been issued⁵⁸

11.6.3 In 2023 an FOI to the MPS about their use of CAWNs received a very different answer. The MPS said that between 2018 and 2022 they had issued a total of 105 CAWNs. This data had been extracted from the CRIS system.⁵⁹ The difference in these two totals is probably a product of the non-statutory nature of CAWNs; with most

⁵⁵ Sec 49(2) Children Act 1989

⁵⁶ Sec 20 Children Act 1989

⁵⁷ Accessed at https://library.college.police.uk/docs/appref/CAWN_Procedures_final_v1.0_240919.pdf

⁵⁸ Accessed at https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/child-abduction-warning-notices?utm_source=chatgpt.com

⁵⁹ Accessed at <https://www.met.police.uk/foi-ai/metropolitan-police/disclosure-2023/june-2023/child-abduction-warning-notices-2018-2022/>

recorded on an intelligence system and a much smaller number being recorded on the crime system when they have contributed to an arrest / crime investigation

11.6.4 Analysis and Recommendation

- CAWNs are an effective and flexible tool that can warn offenders that their conduct in relation to children is criminal.
- Safeguarding Partnerships should develop a cooperative approach to their use.
- The MPS is the only safeguarding partner that issues CAWNs; it should develop a way keeping accurate and accessible records on their use and effectiveness and publicise the results.

12 Drug Dealing Telecommunications Restriction Order (DDTRO)

12.1 This order is covered by the Drug Dealing Telecommunications Restriction Orders Regulations 2017. The orders are issued by the County Court⁶⁰.

12.2 The reason for issuing order

- an order requiring a communications provider to take whatever action the order specifies for the purpose of preventing or restricting the use of communication devices in connection with drug dealing offences.

12.3 Who can apply and when

- A police Superintendent
- The Deputy Director or Director of the National Crime Agency.

12.4 Who /What can be the subject of such an order?

- A communications device that is used is used in connection with a drug dealing offence if it is used by a person ("the user") in the course of—
 - the user committing a drug dealing offence,
 - the user facilitating the commission by the user or another person of a drug dealing offence, or
 - conduct of the user that is likely to facilitate the commission by the user or another person of a drug dealing offence (whether or not an offence is committed).

⁶⁰ Sec 80 A (12) (a) Serious Crime Act 2015

12.5 How are DDTROs used?

- 12.5.1 The order is issued against a communications device and what constitutes such a device is widely cast and is basically anything that can receive or transmit information, or a component part of such a device or something that is used in association with such a device.⁶¹
- 12.5.2 Generally this power is used against phones in the context of county lines, where a group of runners are tasked through the holder of “the deal line” to deliver drugs to the purchaser. The deal line (both the number and the handset) can be disabled. This disrupts the supply chain. However, practitioners report that dealers back up their data, acquire a new handset and are back in business quite quickly.

12.6 How Effective and Widespread is the Use of DDTROs

- 12.6.1 A 2022 government review⁶² (the 2022 Review) of the introduction of DDTROs stated that the purposes of the introduction of the law was

1. Disruption of county lines:

To enable the police to disrupt county lines operations by shutting down ‘deal (phone) lines’ if the police are unable to take physical possession of the handset or SIM card. The expectation was that this would reduce a county line group’s ability to deal drugs and hamper county lines operation.

2. Reduce drug dealing, violent crime and exploitation:

Successful disruption of county lines operations would have significant societal benefits, helping to reduce violent crime and protect vulnerable children and adults targeted and criminally exploited by county lines groups.

- 12.6.2 In 2017, the year that DDTROs were introduced, the NCA estimated that the number of lines was 720⁶³. According to a more recent threat assessment⁶⁴ there are now 6,500 county lines in the UK, which are known to be exploiting or are otherwise associated with at least 2659 children. This more recent number of lines represents a 900% increase over five years.

⁶¹ Section 80 A (12) Serious Crime Act 2015 adopts the definition of what a device is from Prisons (Interference with Wireless Telegraphy) Act 2012 sec 1(3)

⁶² Accessed at <https://www.gov.uk/government/publications/drug-dealing-telecommunications-restriction-orders-2017-post-implementation-review/drug-dealing-telecommunications-restriction-orders-2017-post-implementation-review-accessible-version>

⁶³ Accessed at https://www.nationalcrimeagency.gov.uk/who-we-are/publications/234-county-lines-violence-exploitation-drug-supply-2017/file?utm_source=chatgpt.com

⁶⁴ Accessed at <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2025/county-lines-strategic-threat-risk-assessment-fy-2024-25.pdf>

12.6.3 The 2022 review says, in relation to the objective, *To reduce drug dealing, violent crime and exploitation*, “It is unlikely that DDTROs on their own achieved this wider objective”.

12.6.4 Given the scale of county lines in 2017 the vision for the use of DDTROs was modest. It was originally assumed that the police would apply for about 120 orders a year and about 100 devices a month would be disconnected.

12.6.5 In the five years covered by the review between 2017 and 2022, 360 DDTROs had been issued and 527 devices were disabled, although more latterly in 2020 – 2022 there were 120 disconnections in each of these years.

12.6.6 The number of orders obtained was slightly less than had been expected, while the number of devices disabled significantly less.

12.6.7 In a separate 2020 thematic review of the NCA and police response to protecting children and vulnerable people caught up in county lines, *Both Sides of the Coin*, HMICFRS found little support for their use, principally because, “drug dealers obtain replacement phones and numbers quickly and anonymously”.⁶⁵

Commented [JD1]: This is why I believe we have stopped using the tactic

12.6.8 The NPCC County Lines Policing Strategy 2024-2027 makes no mention of DDTROs.

12.7 A Fresh Thought

12.7.1 There is little current appetite for these orders in local policing. Police refer to it as game of “whack-a-mole”, in which everything is in favour of the line holders. The nine - fold increase in the past five years in the number of deal lines is asking for a fresh approach.

12.7.2 So, a better analogy than a fairground game might be that of the Hundred Headed Hydra, which grew back two heads for every one cut off. Following that analogy, we should copy Hercules who finally destroyed it by killing the body as well. So, a fresh approach could be to use the DDTRO to be the real disruption tool it was intended to be by using it to destroy the whole county lines network.

12.7.3 An order does not need to be confined to the one or two phones known to belong to the dealer. It could equally apply to the phones used by the buyers. Should their

⁶⁵ Accessed at https://assets-hmicfrs.justiceinspectorates.gov.uk/uploads/both-sides-of-the-coin-police-nca-response-vulnerable-people-county-lines-drug-offending.pdf?utm_source=chatgpt.com

phones be disabled the dealer's back up data would be of no use. The Hydra's head would have no body to control.

- 12.7.4 A DTTRO is a civil order and it is made against devices not against people. The court is not concerned with the criminal burden of proof and makes its orders on a balance of probabilities. A purchaser who contacts a deal line to place an order is using a device that facilitates the commission by another person of a drug dealing offence⁶⁶. That is a device subject to disablement. The relevant law does not differentiate buyers and sellers it is simply concerned with the communications devices.
- 12.7.5 The whole county lines business model depends on tele communication between people who are generally strangers to each other. At the delivery end of this telecommunications contract is often a frightened and exploited child.
- 12.7.6 The ease with which dealers can reestablish their network relies on the buyers still having their phones. If they didn't then the network has gone and re-establishing it would be much more difficult.
- 12.7.7 A DDTRO can have many devices attached to the order. The original Home Office Plan expected each order to request the disablement of an average of 10 devices. The first five years delivered an average of two. The 2022 Review also found that a DDTRO had a court cost of £332 and the telecoms companies charged £9 to disable each SIM card and phone⁶⁷. The disablement of a dealer's line therefore with 100 associated buyer lines would cost just over £2000.
- 12.7.8 Buyers could receive a warning message as their phone is disabled , explaining that their phone's use to buy drugs leads to the enslavement and exploitation of children and vulnerable adults with advice about they can get support for their drugs habit and how they can get their phone restored of they have been wrongly identified as a buyer.
- 12.7.9 Legally audacious is a term often used by law enforcement professionals. This proposition is that and it may be worth trying.

⁶⁶ Sec 80 (4) (b) A Serious Crime Act 2015

⁶⁷ https://assets.publishing.service.gov.uk/media/63889d71e90e071df7953801/DDTRO_Post_Implementation_Review_-_02-12-22.pdf

12.7.10 Analysis and Recommendation

- DDTROs are not in favour with the police. That means that their potential for disruption is not being utilised.
- The number of County Lines has increased nine-fold in five years.
- A new approach to using them that delivers whole network collapse could be tried.

13. Making Places Safer

- 13.1. The criminal and sexual exploitation of children is frequently perpetrated in public places and other places to which the public have some access such as hotels, cafes, licensed premises, taxi companies, shops, and care homes. The Police, public sector partners and businesses can work together to make these places safer by increasing the vigilance, availability and knowledge of the staff who work there.

13.2 Operation Makesafe

- 13.2.1 Operation Makesafe is a police led initiative that works with businesses and communities to recognise, report, and prevent child exploitation, enabling early intervention to protect vulnerable children, through raised awareness and training. Operation Hydrant⁶⁸ is an NPCC support programme which provides coordination, analysis, guidance and support to forces investigating child sexual exploitation and has developed a useful information pack for forces.⁶⁹

- 13.2.2 In October 2025 HMICFRS published their review⁷⁰ of progress following a 2023 thematic inspection into police effectiveness in tackling group based sexual exploitation. This follow review recommended that Operation Makesafe be introduced by all Chief Constables by 31st July 2026.

13.2.3 What are its aims

- Identify potential victims and ensure an effective safeguarding response.
- To work together with businesses, to give staff confidence and knowledge so they can protect vulnerable children from exploitation.
- Provide public reassurance and effective preventative measures.
- Enhance public safety and confidence.
- Ensure that the police are informed quickly of all relevant incidents.

⁶⁸ https://www.hydrantprogramme.co.uk/assets/Documents/Hydrant-Induction-Pack.pdf?utm_source=chatgpt.com

⁶⁹ https://www.hydrantprogramme.co.uk/assets/Makesafe-2024-Force-Information-Pack-v2.pdf?utm_source=chatgpt.com

⁷⁰ <https://s3-eu-west-2.amazonaws.com/assets-hmicfrs.justiceinspectorates.gov.uk/uploads/inspection-police-law-enforcement-response-group-based-child-sexual-exploitation-progress-report.pdf>

13.2.4 What's involved

13.2.5 Businesses such as hotels, licensed premises, taxi companies, shops, and care homes are provided with awareness training to help them recognise the signs of child exploitation. They are directed to call 101, quoting 'Operation Makesafe', should they suspect suspicious behaviour or activity on their premises or in their vehicles.

13.2.6 Met call handlers have received specialist training to identify calls relating to child exploitation and provide the appropriate advice and police response.

13.2.7 Effectiveness of Makesafe

13.2.8 Makesafe is based on the criminological theory that the absence of a "capable guardian" is a key determinant as to whether crime is committed.

While Operation Makesafe has been widely adopted by police forces there is no formal evaluation of its effectiveness. Existing documentation largely consists of operational reports and case studies demonstrating safeguarding interventions and intelligence generation rather than robust empirical assessment of outcomes.

13.2.9 Although it is an under researched topic a recent Lucy Faithful Foundation⁷¹ paper emphasises that *altering environments and increasing awareness among staff in public settings can prevent abuse before it occurs*⁷².

14 Hotels Guest Data Requirement

14.1 There is police power provided in sec 116 Anti-Social Crime and Policing Act 2014 to require Hotels to provide guest data when there is a suspicion of child sexual exploitation happening at the hotel.

14.2 What it entails

- A police inspector may issue a written notice to the owner/operator/manager of a hotel.
- The officer must reasonably believe the premises has been or will be used for child sexual exploitation (CSE) or related activity.
- The notice can require the hotel to provide guest information (e.g. names, addresses, and other prescribed details).

⁷¹ an organisation committed to the prevention of childhood sexual abuse.

⁷² Accessed at https://www.lucyfaithfull.org.uk/wp-content/uploads/2024/11/Faithfull_Paper_Situational_Prevention_Final.pdf?utm_source=chatgpt.com

- The notice lasts up to 6 months

14.3 Effectiveness of this Power

14.3.1 There is no data on the use of this power and when in 2018 the National Working Group asked police members what their experience was of using the power the general consensus was that it was hardly used.⁷³ Most hotels and similar businesses cooperated and so coercion was not required.

15. Closure Notice and Closure Orders

15.1 There are two relevant closure processes relating to private premises

- Anti-Social Behaviour closure orders
 - available through sec 76- 93 Anti-Social Behaviour, Crime and Policing Act 2014
- Child sexual exploitation closure orders
 - available through sec 136BA - sec 136BC Sexual Offences Act 2003.

15.2 Both orders follow a similar pattern although there is a slightly different delivery mechanism. **Notices** are short term closure provisions which last for up to 48 hours and **Orders** are longer term provisions overseen by the Magistrates Court which can last for up to three months.

15.3 Grounds for Issuing an ASB closure notice

- that the use of particular premises has resulted, or (if the notice is not issued) is likely soon to result, in nuisance to members of the public, or
- that there has been, or (if the notice is not issued) is likely soon to be, disorder near those premises associated with the use of those premises.

15.4 Grounds for issuing a CSE closure notice

- In the previous three months the premises were used for activities related to one or more specified child sex offences, or
- the premises are likely to be used (unless a closure order is made) for activities related to one or more specified child sex offences.

15.5 The Notice Process

15.5.1 In the case of an ASB closure notice a police inspector or a local authority officer can authorise a 24-hour notice on the relevant premises. If either a Police

⁷³ https://nwgnetwork.org/hotels-section-116-anti-social-behaviour-crime-and-policing-act-2014/?utm_source=chatgpt.com

Superintendent or the local authority chief executive agrees the notice can be extended to 48 hours. The Magistrates Court will then decide on whether to turn the notice into an order.

- 15.5.2 In the case of a CSE closure notice only Police Superintendents may authorise a closure notice, but they are required to consult the Local Authority either before issuing the notice or as soon as is practical afterwards. This notice also lasts for 48 hours.

15.6 *The Magistrates Order*

- 15.6.1 For both closure processes if the Magistrates Court is satisfied that the facts support the application it can issue an order which

- includes such provision as the court thinks appropriate relating to access to any other part of a building or other structure in which the premises are situated.
- is made in respect of the whole or any part of the premises in respect of which the closure notice was issued

16 *Public Space Protection Orders (PSPO)*

- 16.1 The power to control what goes on in a public space is provided to Local Authorities by sec 59 Anti-Social Behaviour , Crime and Policing Act 2014. This may not seem like a disruption power that can help much with extra familial harm or child exploitation. However, where the risk to children comes from what happens in public spaces this provision could be very useful.

16.2 *Grounds for a Local Authority Imposing a PSPO*

- 16.2.1 A council can impose a PSPO if activities in a particular area

- Have had a detrimental effect on the quality of life of those in the locality, or it is likely they will.
- The effect is persistent or continuing.
- The behaviour is unreasonable.
- The restrictions are justified to prevent or reduce the behaviour.

16.3 PSPO Restrictions and Requirements

16.3.1 A PSPO can:

- Prohibit certain activities in a public area
- Require certain things to be done by people in the area and
 - The order apply to particular groups of people , say school children but cannot be directed at specific individuals.

16.4 Consultation , Duration and Penalties for Breach

- Before making an order, the local authority must consult
 - The chief officer of police **and** the Police and Crime Commissioner
 - The land owner and
 - Relevant community groups.
- The order can last for up to 3 years and can be extended by a further three years
- A breach is punishable with a fixed penalty notice or prosecution in a magistrate's court.

16.5 Extent and Effectiveness of PSPOs

16.5.1 There is no official published data on how many PSPOs are issued annually or what their effect is. A campaigning group through FoI requests found that a large majority of councils (90% of the 303 who replied) had issued at least one PSPO in the previous five years and 2003 PSPOs were in place in these council areas⁷⁴.

16.5.2 Data shows that PSPOs cover a wide range of activities and depending on the contextual issues that relate to safeguarding young people a PSPO could operate as a disruption tactic.

16.5.3 19,000 penalty notices were issued for breach of a PSPO in 2023 , but nearly 50% of those were issued although the data gathered through the FoI returns does not tend to suggest that adolescent safeguarding is likely to have been a major consideration in establishing the PSPO or enforcing its restrictions and requirements.

⁷⁴ The Manifesto Club – accessed at <https://freedomineverydaylife.org/busybody-fines-rise-42-in-2023/>

17. Conclusion

- 17.1 Arresting and convicting those who criminally or sexually exploit the young is a time consuming and labour-intensive business. Safeguarding partners do not have the resources to keep children safe through prosecuting perpetrators. For that reason Ofsted as far back as 2014 and more recently HMICFRS and the National safeguarding Practice Review Panel have recommended to partnerships that they improve their effectiveness by utilising the many available disruption tools available to them.
- 17.2 These tools are poorly understood and there is a lack of partnership expertise in their use. London's safeguarding partners need to develop new imaginative and stretching ways of improving their disruption activities.
- 17.3 Cooperating on the application process for civil orders and working together to enforce them would make the current process more dynamic and responsive to safeguarding risk.

Chris Miller
Independent Scrutineer
March 2026



Supporting effective multi-agency safeguarding leadership

Appendix A

1. There are five further civil orders which are or could be deployed to disrupt the perpetrators of harm against children. Knife Crime Prevention Orders and Serious Violence Reduction Orders are described below as the legislation to use them exists, but not the permission to use them in London. The other orders are either about to be phased out or the legislation is not yet agreed.
2. They are not included in the main report for the following reasons.
 - a. Anti-Social Behaviour Injunctions are to be phased out
 - b. Knife Crime Prevention Orders (KCPO) although they have been piloted in London, the power to issue them has lapsed. The pilot is currently being evaluated, and there is no date yet for their reintroduction. (See section iii below)
 - c. Serious Violence Reduction Orders are being piloted in four forces, of which the MPS is not one. The pilot will be subject to evaluation and as with KCPOs the date for their UK wide introduction is not known (see section iv below)
 - d. Respect Orders⁷⁵. These will replace anti-social behaviour injunctions. They are similar in construction to anti-social behaviour injunctions but will treat breaches not as a contempt of court which a breach of an ASBI is but as a criminal offence. Respect Orders are not yet legislated for and the proposals to introduce them are still being dealt with through the Parliamentary process.
 - i. It is not wholly clear whether these will be piloted prior to nationwide roll out. In November 2024 the policing minister said in the House of Commons that they would be piloted⁷⁶. In committee stage in November 2025 the Home Office Minister said that they would not be piloted⁷⁷
 - e. Child Criminal Exploitation Orders⁷⁸. These are similar in construction to many other civil orders. They can be imposed against convicted offenders by the sentencing court or obtained on application at a Magistrates Court against unconvicted suspects. Before they are made available statutory guidance will be published.

⁷⁵ Chapter 1 Crime and Policing Bill – accessed at <https://bills.parliament.uk/publications/64840/documents/7819>

⁷⁶ Accessed at Column 796 ; https://hansard.parliament.uk/Commons/2024-11-27/debates/55F04882-01EE-4DE9-AA06-B5D8DF30266E/RespectOrdersAndAntisocialBehaviour?utm_source=chatgpt.com

⁷⁷ Accessed at https://www.parliament.co.uk/lord/david-hanson/debate/2025-11-10/lords/lords-chamber/crime-and-policing-bill?utm_source=chatgpt.com

⁷⁸ Chapter 4 , Part 1 Crime and Policing Bill accessed at <https://bills.parliament.uk/publications/64840/documents/7819>

3. Knife Crime Prevention Orders (KCPO) and Serious Violence Reduction Orders (SVRO)

- 3.1 These are provided for in Part Two of the Offensive Weapons Act 2019 (**KCPO**) and The Sentencing Act 2020 (sec 342) (**SVRO**)
- 3.2 KCPOs have been piloted in the MPS area , but the power to apply for an order (police) or hand down an order (Courts) has currently lapsed. SVROs are not yet available in London as they are subject to a four-force pilot which does not include the MPS. .
- 3.3 Both of these orders are intended to deal with the same issue (knife carrying) in broadly similar terms and an adult offender convicted of a knife crime offence could be subject to either order but with slightly different offender management opportunities.
- 3.4 SVROs are not planned to be available for people under the age of 18, but an application for a KCPO can be made for someone over the age of 12.

3.5 *The reason for issuing a KCPO⁷⁹ or an SVRO⁸⁰*

- to protect the public in England and Wales from the risk of harm involving a bladed article,
- to protect any particular members of the public in England and Wales (including the defendant) from such risk, or
- to prevent the defendant from committing an offence involving a bladed article.

3.6 *Who can apply for a KCPO and when*

- On conviction the Crown Court, Magistrates Court or Youth court can make an order **provided the prosecution makes an application⁸¹** for such an order.
- In standalone cases on application to the Magistrates Court (Youth Court for under 18s) when the court considers it necessary to protect
 - the public generally, or
 - specific individuals or
 - to prevent the respondent committing an offence with a bladed implement.
- The people who can make an application for a standalone order are the Local Police, the Ministry of Defence Police, The British Transport Police.

⁷⁹ Sec 19 (4) Offensive Weapons Act

⁸⁰ Sec 342 A (5) Sentencing Act 2020

⁸¹ Sec 19(3) Offensive Weapons Act

3.7 Who can apply for a SVRO and when

- These are only provided for on conviction when
- a person aged 18 or over (“the offender”) is convicted of an offence and
- **the prosecution makes an application** to the court for a serious violence reduction order to be made in respect of the offender.

3.8 Who Can be the subject of a KCPO?

- Anyone upon a conviction for violence, in which offence he or someone with him used or was in possession of a bladed article.
 - The court only needs to be persuaded on a balance of probabilities that the defendant had a knife, used or knife or was in company with someone who had or used a knife.
- Any qualifying offender on a stand-alone application
 - This is someone who the court is satisfied on a balance of probabilities that in the previous two years has on two occasions has been in possession of a bladed implement in a public place, in a school, or on further education premises.
 - This does not require a conviction a caution or even an arrest. A school report, CCTV imagery or evidence from a third party could all help satisfy a court.

3.9 Who Can be the subject of a SVRO?

- Anyone over the age of 18 upon a conviction for violence, in which offence he or someone with him used or was in possession of a bladed article.
 - The court only needs to be persuaded on a balance of probabilities that the defendant had a knife, used or knife or was in company with someone who had or used a knife.

3.10 What orders can the court make when imposing a KCPO ?

The court can with its order

- prohibit the respondent from doing anything described in the order;
- require the respondent to do anything in the order

3.11 What orders can the court make when imposing a SVRO ?

3.11.1 The key effect of an SVRO is that someone subject to an order

- can be stopped and searched in a public place by the police without the searching officer needing to have other grounds – the SVRO is grounds enough.

3.11.2 The other requirements and restrictions a court may impose are fairly minimal at present namely

- The offender must notify address or change of address to the police , and any change of name

3.11.3 At the conclusion of the SVRO pilot and following a review , new requirements and restrictions may be added to the sentencing court when imposing an SVRO.

3.12 *How long does the order last?*

- A **KCPO** lasts for a minimum of six months and a maximum of two years. As with many other similar orders prohibitions and requirements can last for different periods.
- An SVRO lasts for a minimum of six months and a maximum of two years.

3.13 *Powers of arrest*

- A KCPO is breached⁸² if someone
 - Does something prohibited by the order
 - Fails to do something required by the order
- An SVRO is breached if someone
 - fails without reasonable excuse to do anything the offender is required to do by the order,
 - without reasonable excuse does anything the offender is prohibited from doing by the order,
 - notifies to the police, in purported compliance with the order, any information which the offender knows to be false,
 - tells a constable that they are not subject to a serious violence reduction order, or
 - intentionally obstructs a constable in the exercise of any power conferred by section 342E (power to search and seize items) .

And the power of arrest for the breach is the same as for any criminal offence.

⁸² Sec 21(4) Offensive Weapons Act