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Rt Hon Priti Patel MP
Home Secretary
2 Marsham Street
London
SW1P 4DF

25th February 2020

Dear *Priti*

Response to HMICFRS national thematic report – “Both sides of the coin: An inspection of how the police and National Crime Agency consider vulnerable people who are both victims and offenders in ‘county lines’ drug offending”

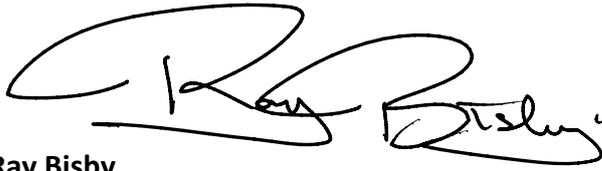
Under Section 55(5) of the Police Act 1996, as Acting Police and Crime Commissioner I am pleased to provide my formal response to HMICFRS’s report entitled “Both sides of the coin: An inspection of how the police and National Crime Agency consider vulnerable people who are both victims and offenders in ‘county lines’ drug offending”.

Both the Chief Constable and I welcome the publication of HMICFRS’ report into county lines: “Both sides of the coin”. The Chief Constable is committed to minimising the threat posed by county lines activity across the Constabulary, pursuing those engaged in serious organised crime and preventing the exploitation of children and vulnerable adults. We note the recommendations within the report and in the first instance the constabulary will work with those responsible for developing the national policing response to them.

I will take further reassurance from the Chief Constable via my Board meeting in due course once the recommendations are in place.

The HMICFRS recommendations are attached in Appendix 1

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ray Bisby', with a stylized, cursive script.

Ray Bisby

Acting Police and Crime Commissioner for Cambridgeshire and Peterborough

cc PCC@hmic.gsi.gov.uk

Appendix 1

1. HMICFRS recommendations:

1. By 30 June 2020, the head of the **national county lines co-ordination centre** should issue revised guidance to forces on how to complete the county lines intelligence collection matrix.
2. By 31 December 2020, the **College of Policing**, in consultation with the relevant National Police Chiefs' Council leads, should develop and publish its evidence-based guidelines addressing risk assessments for vulnerable people. The College should also work with the relevant leads to develop an implementation plan so that risk assessment practice is improved across all forces.
3. By 31 December 2020, the **Director General of the National Crime Agency**, in consultation with the relevant National Police Chiefs' Council leads, should develop a more coherent and integrated system of national tasking. This new system should secure improvements in governance, accountability and performance management.
4. By 31 December 2020, the **Home Office** should carry out a review of the quality and extent of information sharing by public bodies for law enforcement purposes. The review should clarify the legal position and identify opportunities to address the cultural, systemic, procedural, operational and technological barriers that interfere with the efficient, effective exchange of information for law enforcement purposes.
5. By 31 December 2020, the **Home Office**, in consultation with other relevant government departments, should secure that the definition of child criminal exploitation in the Serious Violence Strategy (or an amended version of the definition) is placed on a statutory footing.
6. By 30 June 2020, **the College of Policing** should amend the "release from custody" subsection of the authorised professional practice on detention and custody to include consideration of the risks of exploitation faced by vulnerable detainees after their release from custody.
7. By 31 December 2020, **the Department for Education** should establish formal arrangements for relevant police forces to be notified when local authorities move children at high risk of criminal exploitation from area to area.
8. By 30 June 2020, **the Director General of the National Crime Agency** should create a dedicated, central team to co-ordinate the use of drug dealing telecommunications restriction orders.
9. By 31 December 2020, **the Home Office** should commission a review of the criminal abuse of mobile telecommunications services. The review should explore whether the regulatory environment within which the mobile telecommunications industry operates (particularly in relation to anonymous access to devices and services) is in need of strengthening in order to reduce the criminal abuse of mobile telecommunications services.
10. By 31 December 2020, the **Home Office** should commission a detailed review of cases involving the defence under section 45(1) of the Modern Slavery Act 2015. The review should establish whether there is sufficient justification to amend the law.