



Equality Impact Assessment [EIA] Crime and Policing Bill

Coerced Internal Concealment offence

1. Name and outline of policy proposal, guidance, or operational activity

This Equality Impact Assessment (EIA) relates to Government clause 59 of the Crime and Policing Bill to introduce a standalone criminal offence of coerced internal concealment (CIC), also known as ‘plugging’.

Broadly, coerced internal concealment (CIC) is the practice whereby a person (child or adult) is caused or coerced into concealing drugs or other objects internally within their body, as a method of transportation to avoid detection. We have strong grounds to believe that CIC is being used in connection with serious criminal activity, including the trafficking of illegal substances for county lines-related criminality, the importation of drugs into the UK, and the smuggling of contraband into prison environments. In itself, CIC is a highly harmful practice whereby an individual is coerced or controlled to insert or ingest an object into their body which could result in short or long term psychological and physical harm to the victim or even death where drugs leak internally causing an overdose.

For child victims, it will be an offence where a person conceals a specified item (as outlined in the legislation) inside a child’s body or where a person intentionally causes a child to conceal a specified item inside their own body, where the person knows/reasonably suspects/intends that the item has been or will be used in connection with criminal conduct (defined in the legislation). For adult victims, it will be an offence where a person conceals a specified item inside an adult’s body or compels, coerces, deceives or uses controlling or manipulating behaviours towards an adult to cause them to conceal a specified item inside their body, where the person knows/reasonably suspects/intends that the item has been or will be used in connection with criminal conduct.

The offence will be triable either way and will attract a maximum penalty on indictment of ten years’ imprisonment, or a fine, or both.

We will issue guidance for the police and other relevant law enforcement bodies, to which those persons must have due regard, to support implementation of the offence and strengthen the frontline response to both perpetrators and victims of CIC.

The Bill will add the CIC offence to the list of offences that are considered to be a ‘criminal lifestyle offence’ when calculating a confiscation order under the Proceeds of Crime Act 2002, the regime that confiscates monetary gains from criminals. This will mean that persons convicted of a CIC offence are liable to repay unexplained income and expenditure from 6 years before the proceedings that led to the conviction started, unless it can be proved that the income was legitimately obtained.

The Bill will also make amendments as necessary to ensure that victims of CIC are automatically eligible for “special measures” protections when giving evidence in court in criminal proceedings relating to a CIC offence.

2. Summary of the evidence considered in demonstrating due regard to the Public-Sector Equality Duty.

Summary of current data available

CIC is hidden by nature making it challenging for professionals to identify. Since CIC is not yet a standalone offence, it is not recorded by police, resulting in a lack of national data on its prevalence and impact. This limits the department's ability to assess the effect of this policy on protected characteristics.

The Home Office does not hold any quantitative data on the scale of CIC, and engagement with the police and the Crown Prosecution Service has confirmed that they do not hold any data on the extent or scale or record of prosecutions for CIC on file. However, through stakeholder engagement with the police, criminal justice system partners, non-governmental organisations, and the Devolved Administrations we have captured anecdotal evidence, particularly relating to the impact of CIC on victims and the ways in which it is perpetrated. We understand CIC to be a common and harmful tactic utilised in the county lines drug supply model and a feature of child criminal exploitation (CCE). Through stakeholder engagement we have gathered evidence that CIC is used for concealment of other items as well as drugs, albeit usually to facilitate county lines activity. Items concealed can include SIM cards, weapons, mobile phones, money, USB sticks and stolen goods.

Although there is currently no comprehensive national dataset specifically focused on CIC, our assessment has drawn on the best available evidence to ensure due regard to the Public Sector Equality Duty. This includes data from the Children in Need Census, the National Referral Mechanism (NRM), and police data held by the National County Lines Coordination Centre (NCLCC). We have also considered estimates from the Children's Commissioner and insights from non-governmental organisations and subject matter experts. These sources have helped us understand the potential impact of CIC on different groups. We expect that introducing a standalone offence will support more consistent and detailed data collection in the future, particularly around the experiences of both victims and those criminally exploited.

The below summary covers the current available information across several protected characteristics. **We do not currently hold any information on religion, maternity, sexual orientation, pregnancy, and gender reassignment.** This EIA will be amended if this data becomes apparent.

Age

Available data suggests that victims of CIC are more likely to be children, whereas perpetrators are more likely to be adults.

National Referral Mechanism data suggests that victims of criminal exploitation are disproportionately children.¹ The County Lines Strategic Threat Risk Assessment assesses that most children involved in county lines are aged 15 to 17 and that they are mainly

¹ Home Office, National Referral Mechanism and Duty to Notify statistics (2023). Available at: <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2023/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2023>

recorded in the most dangerous ‘runner’ or ‘workforce’ roles within drugs supply,² which could include the practice of coerced internal concealment.

Police data published by the NCLCC in its County Lines Strategic Threat Risk Assessment show that 22% of those individuals involved in County Lines are children, equivalent to 2,888 children recorded as involved in County Lines in FY23/24. [OBJ]

Our estimates show approximately 14,500 children were identified as at risk or involved in child criminal exploitation in 23/24. However, anecdotal evidence suggests this is likely to be a significant underestimate of the scale of the problem of child criminal exploitation (which may involve coercive internal concealment)³. In 2019, research by the Children’s Commissioner estimated that 27,000 children were involved in gangs and up to 120,000 children faced risk factors linked to exploitation.⁴

The Children’s Society have also found that 14- to 17-year-olds are the most likely age group to be exploited by criminal gangs. Their evidence also showed that primary school children as young as seven or eight being targeted and exploited.⁵

Perpetrators

The 23/24 County Lines Strategic Threat Risk Assessment found that adults between 22 and 30 years of age make up the largest group of individuals recorded as involved in County Lines.⁶

- Children accounted for 22% of all individuals recorded as involved in County Lines between April 2023 and March 2024. This is a decrease from 26% the previous year.
- The remaining 78% were adults, with the 22–30 age group being the largest demographic among them.
- The report does not provide a precise percentage split between victims and perpetrators within each age group. However, it emphasises that involvement includes both roles, and that exploitation remains a central feature, particularly for children, who are often trafficked and placed in high-risk roles such as drug running.

Disability

There is no available data to determine the scale and impact of CIC on persons with a disability, but we assess that having a disability is likely to make someone more vulnerable to being criminally exploited and therefore more likely to be a victim of CIC.

The 23/24 County Lines Strategic Threat Risk Assessment identifies disability as one of a number of factors increasing vulnerability to county lines exploitation.⁷

² National Police Chiefs’ Council, County Lines – Strategic Threat Risk Assessment (2024). Available at: <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/county-lines-strategic-threat-risk-assessment.pdf>

³ Children in need, Reporting year 2024 - Explore education statistics - GOV.UK

⁴ Children’s Commissioner, Keeping Kids Safe. Available at: <https://assets.childrenscommissioner.gov.uk/wpuploads/2019/02/CCO-Gangs.pdf>

⁵ The Children’s Society, Counting Lives: Responding to Children Who Are Criminally Exploited (2019). Available at: [counting-lives-report.pdf](https://www.childrensociety.org.uk/what-we-do/our-research/counting-lives-report)

⁶ National Police Chiefs’ Council, County Lines – Strategic Threat Risk Assessment (2024).

⁷ National Police Chiefs’ Council, County Lines – Strategic Threat Risk Assessment (2024). Available at: <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/county-lines-strategic-threat-risk-assessment.pdf>

Existing evidence indicates that factors such as drug dependency, disabilities and social, emotional and mental health needs may increase an individual's vulnerability to exploitation. Research undertaken by a number of non-Government organisations concurs that mental health issues, Special Educational Needs and Disability (SEND) or learning difficulties, including neurodivergence, are issues that can affect a person's capacity to make decisions, recognise or communicate that they are being exploited or access support, which can put them at greater risk.

The Jay Review of Criminally Exploited Children (2024) commissioned by Action for Children also suggests that criminally exploited children and young people often have Special Educational Needs and Disability, in particular neurodiversity.⁸

Individuals with a disability therefore may be more likely to be both victims of CIC and to be involved in controlling, coercing, deceiving, manipulating or controlling others to internally conceal.

Race

There is no available data to determine the scale and impact of CIC in terms of race, but we assess that individuals of BLACK ethnicity are likely to be overrepresented as both victims and perpetrators, as they are with county lines and CCE more generally.

The 23/24 County Lines Strategic Threat Risk Assessment found that in all regions (except London), the greatest proportion of individuals involved in county lines were of White ethnicity. However, in all regions, individuals of Black ethnicity are over-represented in comparison to the regional population data (based on the 2021 census).⁹

Missing episodes are a key risk factor of CCE and it is likely that victims of CIC will also be likely to go missing. The 23/24 County Lines Strategic Threat Risk Assessment also found that while the majority of individuals with missing episodes where County Lines is believed to be an element or causal factor of the event were White (at 55%), Black individuals were more likely to go missing (at over 8 times) when looking at the data per capita. Black individuals went missing at a rate of 6.4 per 100,000 compared to 0.76 per 100,000 for White individuals. Of these individuals, around 88% were children.¹⁰ Furthermore, research highlights that children from Black and ethnic minorities are more likely to have multiple other risk factors, including adverse childhood experiences, poverty, neglect, family substance misuse and exclusion from school, which can put them at greater risk of being criminally exploited.¹¹

Children from ethnic minorities as a whole are also overrepresented in the cohort of vulnerable children in England. As reported in the latest Children in Need Census data (for assessments in the year ending 31 March 2024), children from non-white ethnic groups combined make up 31% of the children assessed as needing help and protection as a result of risks to their development or health.¹² While this data is not limited to CCE, CCE is one of the factors that is recorded by Children in Need data (and child victims of CIC are highly likely to be victims of CCE). This is an overrepresentation in comparison with the overall

⁸ Action for Children Jay Review of Criminally Exploited Children 'Shattered Lives Stolen Futures'. Available here: https://media.actionforchildren.org.uk/documents/Shattered_Lives_Stolen_Futures_Report_Full_Report.pdf

⁹ National Police Chiefs' Council, County Lines – Strategic Threat Risk Assessment (2024).

¹⁰ National Police Chiefs' Council, County Lines – Strategic Threat Risk Assessment (2024).

¹¹ Shaw, J. (2023) 'Won the Battle but Lost the War? 'County Lines' and the Quest for Victim Status: Reflections and Challenges', Youth Justice, 2023, available at: <https://doi.org/10.1177/14732254231202673>

¹² Department for Education, Children in Need statistics (2024).

child population reported in the 2021 census, which reported 27% of children as of non-white ethnicity.¹³

The Jay Review of Criminally Exploited Children assessed that it is unclear whether exploiters disproportionately target Black and minority ethnic children or if Black and minority ethnic children are more readily identified by police and other agencies due to racial bias. It highlighted, for example, that Black children are overrepresented in the criminal justice system generally, citing Black children made up 4% of children aged 10 to 17 in 2021, but 15% of child arrests, 18% of children stopped and searched and 29% of children in custody.¹⁴

The Commission on Young Lives assessed that Black children, particularly teenage boys, are less likely to be seen as victims, and more likely to be viewed as ‘offenders’ and subject to ‘adultification’, where they are excluded from the perception of being vulnerable and experience punitive responses.¹⁵

Sex

There is no available data to determine the scale and impact of CIC in terms of sex, however we know from evidence on CCE that males are more likely to be involved in CCE as both victims and perpetrators but there are likely barriers to the identification of women and girls.

93% of all children linked to County Lines were male, with women and girls accounting for 14.3% of all nominals reported to be involved in county lines in 23/24.¹⁶

Home Office data from the National Referral Mechanism (NRM) reported in December 2024, from October to December 2024, 436 county lines referrals were flagged, accounting for 8% of all referrals received (data table 19). The majority (75%; 325) of these referrals were for male children (at age of referral).¹⁷

The Jay Review of Criminally Exploited Children assessed that the extent and nature of the criminal exploitation of girls remains unknown and that there is a complex overlap with sexual exploitation.¹⁸ The 23/24 County Lines Strategic Threat Risk Assessment adds that “women and girls continue to be under-represented in County Lines, which is likely to be due to their role being more difficult for law enforcement to identify. It is possible that gender biases, including unconscious bias, mean that they are less likely to be interacted with by the police and therefore at greater risk, as there may be less intervention”.¹⁹

Anecdotal evidence suggests that women and girls who are in relationships with individuals involved in criminal activity, particularly drug dealing, may be at risk of being coerced or controlled by their partners into internally concealing items, however we do not have any data on the extent of this practice.

¹³ Office for National Statistics, Census 2021 (2023). Available at: [Ethnic group by age and sex, England and Wales - Office for National Statistics](#)

¹⁴ Action for Children, Shattered lives, stolen futures – The Jay Review of Criminally Exploited Children (2024).

¹⁵ Commission on Young Lives, Hidden in Plain Sight: A national plan of action to support vulnerable teenagers to succeed and to protect them from adversity, exploitation, and harm (2022). Available at: [COYL-FINAL-REPORT-FINAL-VERSION.pdf](#)

¹⁶ National Police Chiefs’ Council, County Lines – Strategic Threat Risk Assessment (2024).

¹⁷ [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, quarter 4 2024 - October to December - GOV.UK](#)

¹⁸ Action for Children, Shattered lives, stolen futures – The Jay Review of Criminally Exploited Children (2024).

¹⁹ National Police Chiefs’ Council, County Lines – Strategic Threat Risk Assessment (2024).

3. Consideration of limb 1 of the duty: Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act.

Age

Direct Discrimination

We are not aware of any evidence to suggest that people with the protected characteristic of age are likely to be disadvantaged by this policy. However, victims of CIC aged under 18 may be more advantaged by this policy than those aged over 18 because the prosecution will only need to prove that a child has been intentionally caused to internally conceal, whereas proof of compulsion, coercion, deception, control or manipulation is required where the victim is an adult.

For victims who are children (i.e. aged under 18), the offence may be made out where the person intentionally causes them to conceal a specified item. For adult victims, the person must compel, coerce, deceive, control or manipulate the adult into concealing a specified item.

There may be a risk of direct discrimination arising from the approach taken in the offence, which adopts a 'no harmful means' threshold for individuals under 18. This means someone can be found guilty of the offence if they intentionally cause a child to internally conceal an item, even if they did not use coercion, control, or other harmful tactics. Because of this lower threshold, it might be easier to make out the offence when the victim is a child. However, this can be justified, as the aim is to give stronger protection to children, who are especially vulnerable and need extra safeguards.

Broadly, that is because any interference is justified to protect an extremely vulnerable cohort of victims – children – who are deserving of greater protection under the law. Across the statute book, the criminal law frequently treats children and adults differently – for example, by creating criminal offences which only apply to children (such as the offence of child cruelty under section 1(1) of the Children and Young Persons Act 1933), many of which are strict liability as to children (for example, causing or allowing death or serious physical harm under section 5 of the Domestic Violence, Crime and Victims Act 2004). The UN Convention on the Rights of the Child additionally require States to act in the best interest of children, and to protect their rights to privacy, honour and reputation and to protect them from all forms of physical and mental violence (Articles 3,16 and 19 respectively).

Children are inherently vulnerable both in terms of their understanding of involvement in criminality and the risk of their exploitation and therefore treating children and adults different pursues the legitimate aim of seeking to protect children from violence, exploitation, harm and inducement into criminality.

Indirect Discrimination

The offence is likely to have an indirect positive impact on children and young people who are more likely to be victims of CIC. It may also have an indirect negative impact given it may increase criminalisation of children who are groomed into committing CIC. Any indirect discrimination, we believe would be a proportionate means of achieving the legitimate aim of protecting victims of CIC.

Victims

The CIC offence is likely to have an indirect positive impact on children and young people who are more likely to be victims of CIC.

As the limited evidence available shows that children and young people are more likely to be used as runners to transport drugs and other items within county lines, we consider it possible that they are more likely to be impacted as victims of the CIC offence.

While the CIC offence does not prevent young people from being criminalised for a related offence (e.g. a possession with intent to supply offence) or for the CIC offence itself, the impact of criminalising CIC aims to deter both potential perpetrators and victims from being involved in the activity. The offence should also improve identification of and support to all victims, regardless of age, from the police and other agencies.

A decision to not introduce a bespoke offence could have an indirect negative impact on adults. Without a bespoke CIC offence, the act of causing a child to internally conceal may be prosecuted under the new CCE offence (as well as under existing legislation), however adult victims would not be covered by this new CCE offence and so would be left to rely on protection under existing legislation (such as the modern slavery offences under the Modern Slavery Act 2015). Therefore, a bespoke offence of CIC would additionally protect adult victims of CIC; not introducing a bespoke offence of CIC would have the opposite effect.

While this is not on the face of the legislation, an unintended consequence of the new offence may be to reduce prosecutions for drugs possession/supply offences. This is because, by raising awareness of CIC as a form of criminal exploitation, police may be more likely to see individuals who are concealing drugs as victims, and while their victim status would not give them immunity to prosecution for possession/supply offences, it may encourage more detailed investigation of exploitation, potentially making a stronger public interest case for non-prosecution of the victim.

Perpetrators / victims of exploitation who carry out CIC

Adults between 22 and 30 years of age make up the largest group of individuals recorded as involved in county lines (either as victims or perpetrators). We consider that perpetrators of CIC are most likely to be young adults, however there is anecdotal evidence that children are sometimes involved in encouraging or coercing their peers to internally conceal. This suggests that children and young adults could be impacted by any improved law enforcement response to CIC to a greater extent than other age groups. This impact could be negative due to increased criminalisation of this age group, however if mitigations in the form of guidance for police and partners are successful, there could be a positive impact due to increased identification of children and young people who are victims of criminal exploitation.

Anecdotal evidence has indicated that potential perpetrators of CIC could have initially been victims of this exploitative activity. Currently the police are already required to refer any child who they believe may be at risk of or experiencing county lines exploitation to children's social care services as per local guidance. Law enforcement also has a positive obligation to investigate whether a child has been a victim of exploitation. Police investigations into the circumstances of the individual will form the basis of the consideration as to whether or not to charge a child with an offence and is an operational decision for police and prosecutors. We rely on the operational discretion of the police and the public interest test decided by the Crown Prosecution Service (CPS) to only bring prosecutions where appropriate.

As per our statutory obligations, we will consult relevant persons before issuing statutory guidance to law enforcement bodies as to their functions to prevent, detect and investigate the new offence, including the National County Lines Coordination Centre.

Designated First Responders for the National Referral Mechanism (NRM), including the police, must refer any child suspected of being a potential victim of modern slavery to the NRM.

The potential for indirect discrimination towards children and young adults who may be more likely to be both victims and perpetrators of coerced internal concealment than other age groups is, we believe, a proportionate means of achieving the legitimate aim of protecting victims of CIC. As set out above, mitigations are in place to reduce the risk of child/young adult victims of criminal exploitation being criminalised by this new offence and we will monitor the impact of implementation of the offence on this cohort.

Harassment and victimisation

We are not aware of any evidence to suggest that the introduction of a CIC offence will increase the harassment or victimisation of victims or perpetrators because of their age.

We assess that victims of CIC are more likely to be children. We anticipate that the proposed new CIC offence is likely to help decrease the harassment and victimisation of children and adults, as it would improve the law enforcement response to offenders and hold them to greater account.

Where a child or vulnerable adult's testimony is required, the proposed "special measures" provisions for involvement of vulnerable victims in court proceedings would further help ensure that these groups are not victimised or harassed as a consequence of their participation. We consider that this will reduce the harassment and victimisation of children and vulnerable adults by reducing opportunities for them to be put at risk of undue influence or threats, e.g. to prevent them from testifying.

Disability

We are not aware of any evidence to suggest that offenders with this protected characteristic are likely to be disadvantaged by this policy because a new criminal offence will apply to all offenders regardless of this protected characteristic.

Direct Discrimination

We are not aware of any evidence to suggest that persons with a disability will be disadvantaged by a bespoke CIC offence.

Indirect Discrimination

Victims

The offence applies to all adults equally but sets out that when considering whether a person has been subject to control or manipulation consideration should be given as to whether their personal circumstances make them more vulnerable and other persons. This means that where a person's disability makes them more vulnerable, additional consideration would be given. However, the purpose of this provision is to ensure that vulnerabilities are not overlooked when considering whether a person is complicit in the act of internal

concealment and therefore seeks to protect vulnerable individuals from being disadvantaged rather than providing them with an advantage over non-vulnerable groups.

We consider that this approach is justified to provide additional protection to vulnerable adults who may not have required the same level of manipulation or deception as non-vulnerable adults in order to cause them internally to conceal.

We are not aware of any evidence to suggest that victims with a disability will likely be disadvantaged by a bespoke CIC offence. However, as those with a vulnerability are at a higher risk of being a victim, it is likely that this offence will have a positive impact on those with a disability by reducing the risk of them being subjected to CIC.

Perpetrators / victims of exploitation who carry out CIC

Evidence suggests that individuals with disabilities including mental health issues, neurodiversity, special educational needs and learning difficulties may be more at risk of exploitation than other groups. It is therefore possible that perpetrators of CIC who have been victims of exploitation themselves may be more likely to have a disability and therefore may be negatively impacted by increased criminalisation.

We consider that there are existing processes in place to mitigate this risk. The operational discretion of the police and the non-punishment principles as applied by the CPS, will remain in place. This includes considering whether potential existing defences in the common law (such as duress) are relevant or whether it is in the public interest to prosecute. The CIC offence is also designed to allow for prosecutions against perpetrators who exploit others indirectly, i.e. through another, in order to “go after” more senior gang members who are using more junior gang members to carry out CIC. This will be further supported by statutory guidance that will accompany the new offence to support the police to identify victims and to pursue the offenders behind these crimes.

We believe any indirect impact on this protected characteristic would be a proportionate means of achieving the legitimate aim of prosecuting criminal behaviour that more appropriately reflects the harm done to victims by CIC and protecting the public.

Harassment and victimisation

We are not aware of any evidence to suggest that a CIC offence will increase the harassment or victimisation of disabled victims or perpetrators.

We assess that having a disability may increase the risk of being a victim of CIC. We assess that the new CIC offence is likely to help decrease the harassment and victimisation of disabled victims, as it would improve the law enforcement response to offenders and hold them to greater account.

Where a vulnerable victim’s testimony is required, the proposed “special measures” provisions for involvement of vulnerable victims in court proceedings would further help ensure that these groups are not victimised or harassed as a consequence of their participation. We consider that this will reduce the harassment and victimisation of individuals who may be vulnerable as a result of disability by reducing opportunities for them to be put at risk of undue influence or threats, e.g. to prevent them from testifying.

Race

Direct Discrimination

We are not aware of any evidence to suggest that people with this protected characteristic are likely to be disadvantaged by this policy because a new criminal offence will apply regardless of this protected characteristic. As a result, we consider that the policy is not likely to be directly discriminatory within the meaning of the Equality Act 2010.

Indirect Discrimination

Victims

As the data indicates, it is likely that Black people are over-represented as victims of CIC therefore introducing a CIC offence should benefit this cohort by reducing the risk of them, and victims of other races, being subjected to CIC.

Perpetrators / victims of exploitation who carry out CIC

As Black adults are overrepresented as perpetrators of county lines and Black children are more likely to be seen as offenders, there is a risk that introducing a CIC offence may disproportionately impact Black people in terms of criminalisation.

These groups could therefore also be impacted to a greater extent by additional sentencing resulting from a new offence, with data showing that since 2018, White defendants have had a consistently lower average custodial sentence length (ASCL) than all other ethnic groups combined for indictable offences. In 2022, white offenders had an ACSL of 21.2 months in comparison to 30.5 months for Asian offenders, 27.9 months for Black offenders, 25.2 months for mixed offenders and 22.9 months for the other ethnic group²⁰.

We believe any indirect impact on this protected characteristic would be a proportionate means of achieving the legitimate aim of prosecuting criminal behaviour that more appropriately reflects the harm done to victims by CIC and protecting the public.

Harassment and victimisation

We are not aware of any evidence to suggest that a CIC offence will increase the harassment or victimisation of victims or perpetrators of any particular race.

We assess that Black people may be disproportionately at risk of being a victim of CIC. We assess that the CIC offence is likely to help decrease the harassment and victimisation of Black victims, as it would improve the law enforcement response to offenders and hold them to greater account.

Sex

Direct Discrimination

We are not aware of any evidence to suggest that persons of either sex will be disadvantaged by a bespoke CIC offence.

²⁰ Statistics on Ethnicity and the Criminal Justice System. Available here: <https://www.gov.uk/government/statistics/ethnicity-and-the-criminal-justice-system-2022/statistics-on-ethnicity-and-the-criminal-justice-system-2022-html#defendants> <https://www.gov.uk/government/statistics/ethnicity-and-the-criminal-justice-system-2022/statistics-on-ethnicity-and-the-criminal-justice-system-2022-html>

Indirect Discrimination

Victims

Both males and females can be targeted for CIC but there are likely barriers to the identification of women and girls, as seen more broadly in the county lines context. These can be cultural and police procedural barriers. The NCLCC Strategic Assessment 2024 notes that 'Women and girls continue to be under-represented in County Lines, which is likely to be due to their role being more difficult for law enforcement to identify. It is possible that gender biases, including unconscious bias, mean that they are less likely to be interacted with by the police and therefore at greater risk, as there may be less intervention'.²¹

It is understood that women, particularly sex workers, have often been exploited to conceal items, such as drugs and commodities. As they are not stopped and searched as often as males, they are at risk of being more vulnerable to being used by criminal gangs for this activity.

Increased awareness of CIC may therefore have a positive impact on women and girls who are likely to be under-identified currently. The introduction of a new offence should improve protection and support for female victims of CIC.

Perpetrators / victims of exploitation who carry out CIC

As men and boys are overrepresented as perpetrators of county lines, there is an indirect risk that introducing a CIC offence may disproportionately impact males in terms of criminalisation.

If coercion is not clearly distinguished, victims (especially women over 18) could be prosecuted as drug smugglers. Reports from Scotland note that exploited children are "more likely to be prosecuted for offending behaviour, rather than being recognised as victims".²²

Girls forced to carry drugs internally might similarly be treated as criminals first, rather than safeguarded. Convictions or even arrests would disadvantage them relative to men (e.g. by resulting in criminal records that hinder jobs, education or travel)

We believe any indirect impact on this protected characteristic would be a proportionate means of achieving the legitimate aim of prosecuting criminal behaviour that more appropriately reflects the harm done to victims by CIC and protecting the public.

Furthermore, our assessment is that introducing a new offence of CIC is unlikely to indirectly discriminate perpetrators of this form of criminal exploitation according to their sex. This is because there are already existing laws in place, which can be used to prosecute perpetrators regardless of their sex. These legal frameworks ensure that individuals who exploit others through CIC can be held accountable, and that the introduction of a CIC-specific offence would not unfairly impact one sex over another.

Any disproportionate impact on either sex represented in the offender cohort can be objectively justified as being a proportionate means of achieving the legitimate aim of protecting victims from CIC.

²¹ National Police Chiefs' Council, County Lines – Strategic Threat Risk Assessment (2024). Available here: <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2024/county-lines-strategic-threat-risk-assessment.pdf>

²² [Exploited and Criminalised report.pdf](#)

Harassment and victimisation

We are not aware of any evidence to suggest that a CIC offence will increase the harassment or victimisation of victims or perpetrators of any particular sex.

We assess that men and boys may be disproportionately at risk of being victims of CIC and that women and girls may be currently under-identified. We assess that the CIC offence is likely to help decrease the harassment and victimisation of victims of both sexes, as it would improve the law enforcement response to offenders and hold them to greater account.

Gender Reassignment

There is no data available to assess whether the CIC offence and the associated policy will impact this limb. The offence does not discriminate between male and female body parts in terms of internal concealment, however in developing guidance, we will consider whether information is needed on the response to victims of CIC who are transgender.

Maternity and Pregnancy

There is no available data to assess whether the policy will impact this limb. The EIA will be amended if this becomes apparent.

Religion or Belief

There is no available data to assess whether the policy will impact this limb. The EIA will be amended if this becomes apparent.

Sexual Orientation

There is no available data to assess whether the policy will impact this limb. The EIA will be amended if this becomes apparent.

4. Consideration of limb 2: Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

Age

We are not aware of any evidence which indicates that a standalone criminal offence of CIC would limit or hinder the equality of opportunity between people who share this protected characteristic and people who do not share it.

Stakeholders working in the field have informed us that there is limited support for children in understanding the impacts from CIC and the safe removal of items. Increased activity to prosecute CIC as an offence, could lead to greater awareness of the harm caused and support victims by either reducing involvement or seeking support.

The new CIC offence would complement existing offences and the new CCE offence in aiming to advance the equality of opportunity for victims of all age groups by reducing their exploitation and risk of being coerced to internally conceal an object for criminal purposes.

Disability

We are not aware of any evidence which indicates that a standalone criminal offence of CIC would limit or hinder the equality of opportunity between people who share this protected characteristic and people who do not share it.

It will, as well as existing offences and the new CCE offence, aim to advance the equality of opportunity for victims, including persons with a disability who may be at greater risk and more vulnerable to being placed in situations which could result in physical and psychological harm, by reducing their likelihood of exploitation and risk of being coerced to internally conceal an object for criminal purposes.

Race

We are not aware of any evidence which indicates that a standalone criminal offence of CIC would limit or hinder the equality of opportunity between people who share this protected characteristic and people who do not share it.

The potential benefits of a standalone criminal offence of CIC will include improved awareness of CIC and a more effective enforcement response against perpetrators. Therefore, we expect any activity to result in improved outcomes for vulnerable people, regardless of race, who are likely to be victims of CIC as well as for those involved in CIC who are victims of exploitation including children from ethnic minority backgrounds, especially Black children, who may be overrepresented as victims of CIC.

Sex

We are not aware of any evidence which indicates that a standalone criminal offence of CIC would limit or hinder the equality of opportunity between people who share this protected characteristic and people who do not share it.

The potential benefits of a standalone criminal offence of CIC include improved awareness of CIC and a more effective enforcement response against perpetrators. Therefore, we expect any activity to result in improved outcomes for the vulnerable people, regardless of sex, who are likely to be victims of CIC– but also where barriers to the identification of women and girls are improved.

Gender Reassignment

There is no available data to assess whether the policy will impact this limb. The EIA will be amended if this becomes apparent.

There is no data available to assess whether the CIC offence and the associated policy will impact this limb. The offence does not discriminate between male and female body parts in terms of internal concealment, however in developing guidance, we will consider whether information is needed on the response and treatment to victims of CIC who are transgender.

Maternity and Pregnancy

There is no available data to assess whether the policy will impact this limb. The EIA will be amended if this becomes apparent.

Religion or Belief

There is no available data to assess whether the policy will impact this limb. The EIA will be amended if this becomes apparent.

Sexual Orientation

There is no available data to assess whether the policy will impact this limb. The EIA will be amended if this becomes apparent.

5. Consideration of aim 3 of the duty: Fostering good relations between people who share a protected characteristic and persons who do not share it.

Actions to Foster Good Relations

The introduction of a standalone CIC offence is expected to:

- Improve awareness and understanding of CIC across all protected groups.
- Support more consistent identification of victims, including those from underrepresented or marginalised groups.
- Enhance the tools available to prosecute perpetrators and protect victims, which may improve public confidence in the justice system.

Mitigating Negative Impacts

While the offence itself is not expected to cause harm, we recognise the importance of:

- Tailored communication and training for frontline professionals to ensure fair and consistent application.
- Engagement with affected communities, particularly racially minoritised groups, to address concerns around criminalisation and build trust.
- Monitoring and evaluation to ensure the offence is applied equitably and does not reinforce existing disparities.

Justification

Where concerns exist—particularly around race and the risk of criminalising victims—the standalone offence is justified by its potential to:

- Clarify the legal framework.
- Improve victim identification.
- Strengthen enforcement against exploiters.

The overall impact of the proposed CIC offence on fostering good relations is expected to be positive or neutral. While some risks exist, particularly around race, these can be addressed through targeted engagement, training, and monitoring.

The offence provides an opportunity to improve trust in the justice system and better protect vulnerable individuals across all protected characteristics

Age

We are not aware of any evidence which indicates that a standalone criminal offence of CIC would limit or hinder the fostering of good relations between people who share this protected characteristic and people who do not share it.

A bespoke CIC offence would provide additional protection for both adults and children.

The benefits of existing powers to prosecute this offence and the potential benefits of the new CCE offence include an enforcement response against perpetrators and protection of victims.

Disability

We are not aware of any evidence which indicates that a standalone criminal offence of CIC would limit or hinder the fostering of good relations between people who share this protected characteristic and people who do not share it.

The potential benefits of a standalone criminal offence of CIC include improved awareness of CIC and a more effective enforcement response against perpetrators. By encouraging professionals to better identify victims and enhancing the tools available to punish offenders and protect the public, it may result in improved trust and confidence among people who share this characteristic and those who do not in the criminal justice system's response to CIC.

Race

We are not aware of any evidence which indicates that a bespoke CIC offence limits or hinders the fostering of good relations between persons of different race.

However, it should be noted that young people, in particular young Black men, are stopped and searched at higher rates. Furthermore, evidence from the Lammy Review (2017) and research by the Children's Commissioner (2019), which show that racially minoritised young people are disproportionately vulnerable to criminal exploitation but are often criminalised rather than safeguarded.²³

The CIC offence will complement existing powers to prosecute this offence, and the potential benefits of increasing prosecutions means that practitioners may find it easier to identify victims and improve the understanding of the harms and risks of this activity, enabling appropriate safeguards to be applied. The new CCE offence will also include an enforcement response against perpetrators and protection of victims.

The potential benefits of a standalone criminal offence of CIC include improved awareness of CIC and a more effective enforcement response against perpetrators. By encouraging professionals to better identify victims and enhancing the tools available to punish offenders and protect the public, it may result in improved trust and confidence among people who share this characteristic and those who do not in the criminal justice system's response to CIC.

Sex

We are not aware of any evidence which indicates that a standalone criminal offence of CIC would limit or hinder the fostering of good relations between people who share this protected characteristic and people who do not share it.

The potential benefits of a standalone criminal offence of CIC includes improved awareness of CIC and a more effective enforcement response against perpetrators. By encouraging professionals to better identify victims and enhancing the tools available to punish offenders

²³ [The Lammy Review](#)

and protect the public, it may result in improved trust and confidence among people who share this characteristic and those who do not in the criminal justice system's response to CIC.

6. Ongoing compliance with the PSED.

We acknowledge that there is currently limited data available on the full scale and impact of CIC, particularly in relation to different protected characteristics. To address this, we will seek further views where appropriate and develop statutory guidance to support implementation. This guidance will help mitigate risks, ensure those enforcing the offence have due regard to equality considerations, and put in place appropriate safeguards to protect those most at risk.

To identify any unforeseen direct or indirect discrimination:

- We will review available data on individuals affected by CIC-related investigations, charges, and prosecutions (e.g. by age, sex, race, disability).
- Track outcomes for victims and perpetrators across protected groups to identify disparities in treatment or access to support.
- Review case studies and frontline practitioner feedback to detect patterns of concern or unintended consequences.
- Engage with community organisations and advocacy groups representing protected groups to gather qualitative insights.

7. Review date

The proposals considered in this document will be reviewed throughout the legislative process and will be subject to the normal post-legislative review three to five years after Royal Assent.

8. Declaration

I have read the available evidence, and I am satisfied that this demonstrates compliance, where relevant, with Section 149 of the Equality Act and that due regard has been made to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.

SCS sign off: Caroline Hart, Crime Directorate / Targeted Interventions Unit

Lead contact:

Date: 2 December 2025

For monitoring purposes all completed EIA documents **must** be sent to the PSED@homeoffice.gov.uk

Date sent to PSED Team: 2 December 2025