

Group localised grooming: what is it and what challenges does it pose for society and law?

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A

INTRODUCTION

Group localised grooming (GLG) has recently attracted much media attention¹ and inquiries by the Office of the Children's Commissioner and a parliamentary select committee were launched in 2011² and 2012³ following the convictions of numerous perpetrators in large scale cases involving groups targeting, sexually abusing and exploiting adolescents in Derby, Rochdale and Oxford.⁴ Of particular concern is the way in which groups of perpetrators are able to effectively target and groom adolescents, building up a relationship of trust in order to achieve the goal of involving them in sexually related act(s).⁵ This practice is commonly referred to as *gang* street grooming in media reports. However, we have chosen to use the word *group* to avoid connotations of street gangs involved in a range of criminal and violent behaviour and conflicts with rival gangs.⁶ We follow the Office of the Children's Commissioner's definition of a group as '[t]wo or more people of any age, connected through formal or informal associations or networks, including, but not exclusive to, friendship groups'.⁷ We use the term *localised* grooming⁸ rather than *street* grooming to convey the fact that the grooming occurs in public settings local to victims including, but not limited to, the street.

Notably, there is as much ambiguity surrounding what GLG *is* as there is about behaviour that constitutes sexual grooming more generally and misconceptions and misunderstandings are common. For example, recent media coverage of localised grooming has been criticised for reinforcing myths by presenting 'depictions of the "anonymous stranger"' as posing the greatest risk to children.⁹ However, such constructions fail to understand the nature of the GLG process. Those who groom children in this context are far from strangers to the victims; they are individuals whom victims have come to trust and often love. Whilst research has been conducted by third sector child protection organisations and public bodies,¹⁰ numerous

* Law School, Lancaster University. We are grateful to Alisdair Gillespie for his very helpful comments on earlier drafts of this paper and express our thanks to the journal's anonymous reviewers.

¹ See 'Is sex abuse grooming a growing problem in the UK?', BBC News, 7 January 2011, at <<http://www.bbc.co.uk/news/uk-12140641>> and the news reports listed below.

² See Office of the Children's Commissioner's Inquiry into Child Sexual Exploitation in Gangs and Groups (hereafter OCCI), *Interim Report* (November 2012), at <<http://www.childrenscommissioner.gov.uk/info/csegg1>>. According to this Inquiry, there were 2,409 victims of sexual exploitation by gangs and groups between August 2010-October 2011 (at p 9).

³ Home Affairs Committee, *Second Report: Child Sexual Exploitation and the Response to Localised Grooming* (2013), at <<http://www.publications.parliament.uk/pa/cm201314/cmselect/cmhaff/68/6802.htm>>.

⁴ 'Rochdale Grooming Trial: Nine Men Jailed', BBC News, 9 May 2012, at <<http://www.bbc.co.uk/news/uk-england-17993003>>; 'Ringleaders of Derby Sex Abuse grooming gang jailed', BBC News, 7 January 2011, at <<http://www.bbc.co.uk/news/uk-12140540>>. See also 'Operation Bullfinch trial verdicts – Oxford', Thames Valley Police press release, 14 May 2013, at <<http://www.thamesvalley.police.uk/newsevents/newsevents-pressreleases/newsevents-pressreleases-item.htm?id=253413>>.

⁵ See S Craven, S Brown and E Gilchrist, 'Sexual Grooming of Children: Review of Literature and Theoretical Considerations' (2006) 12(3) *Journal of Sexual Aggression* 287; S Ost, *Child Pornography and Sexual Grooming* (Cambridge University Press, 2009), at pp 32-39. For the purposes of brevity, we use the feminine pronoun when referring to victims in this paper. But we note that victims are both male and female. See n 97 below.

⁶ See OCCI, n 2 above, at p19.

⁷ *ibid.*

⁸ See CEOP, *Out of Mind, Out of Sight: CEOP thematic assessment* (CEOP, 2011), at p 5, at <<http://www.ceop.police.uk/publications/>>.

⁹ M Williams and K Hudson, 'Public Perceptions of Internets, Familial and Localised Grooming: Predicting Perceived Prevalence and Safety' *Journal of Sexual Aggression* DOI: 10.1080/13552600.2012.705341, at p 4.

¹⁰ For example, Barnardo's, *Cutting Them Free* (Barnardo's, 2012) at

questions remain regarding the features of GLG and how it relates to the wider context of child and adolescent sexual abuse and exploitation. This poses a real problem, since it is much harder to tackle GLG with the aim of improving child protection against sexual abuse and exploitation if there are varying understandings of what it is and, indeed, if it is unclear whether there is one *distinct* phenomenon or if it is more nuanced. Moreover, the ability to tackle GLG is hampered by questions regarding which adolescents are (most) vulnerable to GLG, the existence of damaging constructions of non-ideal victims and the difficulties of finding an appropriate criminal offence to best capture this behaviour. As Anne-Marie McAlinden has recently noted, GLG 'is perhaps one of the most high profile forms of grooming, but remains one of the hardest forms for justice and support agencies to detect and target'.¹¹

We begin by analysing the features and stages of GLG and how it fits with current understandings of sexual grooming and is a part of the wider phenomenon of child and adolescent sexual abuse and exploitation (C/ASAE). The majority of the victims in the cases we examine are adolescents in the thirteen to seventeen year old age group. Thus, we refer to C/ASAE as opposed to the more common term 'child sexual abuse' which is generally, but perhaps misleading, used in an all-encompassing way.¹² One of our central arguments here is that although the methods used in GLG share some commonality with methods utilised in other grooming contexts,¹³ a significant difference is that it results in C/ASAE on a wider scale than the grooming that has been discussed in the academic literature until now. In contrast to grooming that leads to sexual abuse of the child/adolescent perpetrated by the groomer alone, GLG is the start of an abusive process that can lead to wider exploitation involving numerous perpetrators, such as trafficking, depending on the perpetrators' intentions and the success of the GLG process. It is also a process that involves multiple perpetrators and thus we look to the limited research which exists on group sexual offending to explore what insights it might offer and whether connections can be drawn with other forms of multiple perpetrator offending against children.

We then turn to consider the social and legal challenges that GLG poses. First, we examine the vulnerabilities of the victims, highlighting as a key concern the perpetrators' targeting of particular vulnerabilities (such as being in local care) and more general adolescent vulnerabilities. Also here, engaging with critical victimology approaches, we explore the construal of some adolescent girls as 'non-ideal' victims complicit in their own abuse, which impacted upon the response to their complaints by social workers, police officers and prosecutors. Secondly, turning to the criminal law, the offence of meeting or arranging to meet a child following grooming under section 15 of the Sexual Offences Act 2003 (the s.15 offence) was designed to enable intervention at an early stage in the abuse process. Our contention is that the elements of the s.15 offence will often be hard to establish in the context of GLG and consequently the offence may be of little use in prosecuting perpetrators. We consider which other offences apply, whether the existing offences appropriately capture GLG, and whether they can do so prior to any consequent abuse and exploitation. Finally, in the concluding section, we offer our views on the steps that could be taken to enable society and law to tackle GLG more effectively.

<<http://www.barnardos.org.uk/cuttingthemfree.pdf>>; OCCI, op. cit. n.2. Note also S Jago, L Arocha, I Brodie, M Melrose, J Pearce and C Warrington, *What's Going on to Safeguard Children and Young People from Sexual Exploitation? How Local Partnerships Respond to Child Sexual Exploitation* (University of Bedfordshire, 2011), at <http://www.beds.ac.uk/_data/assets/pdf_file/0004/121873/wgoreport2011-121011.pdf>.

¹¹ A-M McAlinden, *'Grooming' and the Sexual Abuse of Children* (Oxford University Press, 2012), at p 47.

¹² See generally KV Lanning, 'Compliant Child Victims: Confronting an Uncomfortable Reality', in E Quayle and M Taylor (eds), *Viewing Child Pornography on the Internet* (Russell House Publishing, 2005), at pp. 51-52. We mean misleading here in the sense that 'child' can give the impression of a younger minor. However, we recognise that important steps have been taken in international law to recognise a child as anyone under the age of eighteen in order to offer all under this age protection from sexual abuse and exploitation. See, for example, UN Convention on the Rights of the Child, adopted 20 November 1989, Resolution 44/25, Articles 1 and 34.

¹³ Such as familial and institutional grooming. See further McAlinden, n 11 above.

A EXPLORING THE PHENOMENON OF GLG

B What is grooming?

'It has proven impossible... to neatly segment localised grooming from other forms due to the complexities and overlap within the offending behaviour.'¹⁴

Understanding how victims are identified, targeted and groomed for C/ASAE should lead to a greater understanding of how children/adolescents can be better protected from the harms that grooming can lead to.¹⁵ Back in 1989, Jon Conte et al argued that much of the contemporary understandings about the prevention of child sexual abuse were based on 'anecdotal information about the victimization process'.¹⁶ Twenty-four years later, research centring on sexual grooming is still in its infancy, although literature exists that sheds some light on the grooming process.¹⁷ Yet there is still limited understanding of grooming as a 'distinct behaviour type'.¹⁸ Established models of sex offending against children in the psychological literature have largely neglected to account for the specific role that grooming plays in the abuse process¹⁹ because these models were formulated before it was recognised as a distinct stage in sexual offending.²⁰ More recently, models of grooming processes on the internet have started to emerge.²¹

Current understandings suggest that grooming is a necessary prerequisite in many cases for C/ASAE;²² an opportunity to sexually abuse a child/adolescent is often more likely to emerge following a period of grooming.²³ 'Sexual grooming' is capable of very broad application and, consequently, defining the process is problematic since is not possible to pinpoint the exact point at which grooming begins or ends,²⁴ nor is it possible to illustrate the fluidity of grooming behaviours within one precise model of offending behaviour.²⁵ Furthermore, 'the behaviours used to groom [adolescents] are not dissimilar to [seemingly] innocent behaviour intended to broaden a young person's experiences'.²⁶ Police officers involved in the investigation of C/ASAE have reported that grooming can include giving gifts, offering alcohol and drugs, flattery, attention and monetary rewards.²⁷ Grooming can include any behaviour designed to form a relationship of trust with a child/adolescent with the longer-term goal of sexually abusing her.²⁸ It is generally conceived as a process occurring over a

¹⁴ CEOP, n 8 above, at p 86.

¹⁵ Craven et al., n 5 above, at p 297.

¹⁶ JR Conte, S Wolf and T Smith, 'What Sexual Offenders Tell Us about Prevention Strategies' (1989) 13 *Child Abuse and Neglect* 293.

¹⁷ Craven et al., n 5 above; S Craven, S Brown and E Gilchrist, 'Current Responses to Sexual Grooming: Implications for Prevention' (2007) 46(1) *Howard Journal of Criminal Justice* 60; McAlinden, n 11 above; R O'Connell, *A Typology of Child Cyberexploitation and Online Grooming Practices* (2003). Available at <www.uclan.ac.uk/host/cru/publications.htm>; Ost, n 5 above; H Whittle, C Hamilton-Giacritsis, A Beech and G Collings, 'A Review of Online Grooming: Characteristics and Concerns' (2013) 18 *Aggression and Violent Behaviour* 62.

¹⁸ AA Gillespie, 'Indecent Images, Grooming and the Law' [2006] *Crim. L.R.* 412.

¹⁹ An exception being Finkelhor's Pre-condition Model. See D Finkelhor, *Child Sexual Abuse: New Theory and Research* (Free Press, 1984).

²⁰ See Craven et al., n 5 above, at pp 291 and 297.

²¹ Whittle et al., n 17 above.

²² Ost, n 5 above, at p 32.

²³ KF Durkin, 'Misuse of the Internet by Paedophiles: Implications for Law and Empowerment' (1997) 61(3) *Federal Probation* 14.

²⁴ AA Gillespie, 'Tackling Grooming' (2004) 77(3) *Police Journal* 239.

²⁵ Craven et al., n 5 above, at p 289.

²⁶ *Ibid*, at p 292.

²⁷ Ost, n 5 above, at p.35. See also Whittle et al., n 17 above, at p 64.

²⁸ A comprehensive definition has recently been offered by McAlinden: '(1) the use of a variety of manipulative and controlling techniques (2) with a vulnerable subject (3) in a range of inter-personal and social settings (4) in

period of time rather than a singular event. Indeed, it can merge with the abuse process which can thereby be prolonged because grooming behaviours are employed towards victims to ensure their continued secrecy, trust and compliance.²⁹ This point is worthy of emphasis since victims were clearly abused over a period of time rather than on a single occasion in the GLG cases we discuss below.

B The GLG process

Because grooming can encompass a multitude of behaviours, this begs the question whether it is possible to achieve a clearer understanding of GLG. Its complexities and potential overlap with other forms of grooming and sexually abusive behaviour are emphasised in the quotation from the Child Exploitation and Protection Online Centre (CEOP) at the start of this section. Two recent examples alone demonstrate that even in the particular context of GLG, variations exist. The first, in Derby, led to the conviction of nine men in 2010 for offences related to sexual abuse and other crimes against twenty-seven young female victims.³⁰ Two of the men had repeatedly enticed a number of young girls into their car.³¹ The magnitude of the case is evidenced by the number of victims involved, the youngest of whom was twelve and the oldest eighteen. Some victims stated that they would be forced to have sex after being driven to one of a number of rented houses that members of the group lived in, or a secluded area or park. The abuse was reported to have involved five or six men and, on some occasions, was recorded on mobile phones. No evidence of any money exchanging hands between the men involved was found, but the girls were subjected to 'a form of internal people trafficking' amongst the men in the group.³² This was a notable feature of this case. Girls were seemingly targeted and groomed for the sexual gratification of the men involved only, not for any subsequent financial gain. The second example of a GLG case occurred in Rochdale and involved nine group members who 'groomed' young girls, including a thirteen year old.³³ The girls targeted by the group were groomed for sex and then 'shared' by those in the group and made to have sex with various other individuals. This case highlights exploitation on a wider scale than in the Derby case as victims were exploited for purposes beyond their groomers' sexual gratification. Indeed, financial gain played a vital part in the process; the victims were forced to have sex with other men in return for money.

With these two examples, we appear to be presented with, on the one hand, GLG as a process of achieving child sexual abuse for sexual gratification within the confines of a group of individuals (the internal trafficking which occurred in the Derby case) and, on the other, GLG employed as a means to facilitate wider exploitation for sexual and financial gain by prostitution and wider trafficking (as in the Rochdale case). It is thus our purpose in the remainder of this section to outline the GLG process, to consider the way in which GLG is

order to establish trust or normalize sexually harmful behaviour (5) with the overall aim of facilitating exploitation and/or prohibiting exposure. McAlinden, n 11 above, at p 11 (emphasis is original).

²⁹ Ibid, at p 96.

³⁰ The offences included rape, sexual assault, sexual activity with a child, causing or inciting child prostitution or pornography, aiding and abetting rape, perverting the course of justice and false imprisonment. See sentencing case note for Mohammed Liaqat and Abid Siddique at Nottingham Crown Court on 7 January 2011. See <<http://www.thelawpages.com/court-cases/Mohammed-Romaan-Liaqat-5995-1.law>>.

³¹ 'Derby rape gang "targeted children"', BBC News, 24 November 2010, at <<http://www.bbc.co.uk/news/uk-11819732>>.

³² Ibid.

³³ 'Police raid suspected grooming house', BBC News, 8 May 2012, at <<http://www.bbc.co.uk/news/uk-17940030>>. The leader of the group was jailed for nineteen years for rape, trafficking, conspiracy to engage in sexual activity with a child and sexual assault. See sentencing case note, *R v Hassan and Others*, 9 May 2012, Liverpool Crown Court. Available at <<http://www.judiciary.gov.uk/Resources/JCO/Documents/Judgments/hassan-others-sentencing-remarks-11052012.pdf>>.

employed to facilitate further exploitation, and to place it in the broader context of multiple perpetrator sexual offending.

The reported cases suggest that the GLG process involves three primary stages; (1) identifying the victim; (2) engaging in communication; (3) establishing a level of trust and a relationship. If grooming is successful, this is then followed by sexual abuse of the victim by some or all of those in the group and, in some cases, further sexual exploitation. The grooming process may continue after the abuse has occurred by reinforcing the sexual activity with further gifts and/or affection.³⁴ We will now explore these stages in more detail.

C

Stages 1 and 2: identifying the victim and engaging in communication

At the first stage in the process, in order to target victims, perpetrators target local places in which young people tend to socialise.³⁵ CEOP has shown that recent victims of GLG were often targeted by perpetrators in public places ‘such as a park, cinema, on the street’, shops, restaurants, taxi ranks and takeaways.³⁶ Localised groomers thus appear to exploit adolescents who, like many young people, are out socialising with friends or getting something to eat. But it is important to note that some adolescents were out on the streets after dark,³⁷ which could be an indicator of vulnerability. As we will discuss in the following section, in common with other groomers, some localised groomers deliberately target vulnerable children.³⁸ For example, the two key offenders in the Rochdale group deliberately targeted vulnerable adolescent girls. One of the victims was in local authority care and a number of the others were known to children’s social care services within the city. In line with research which suggests that some groomers often target several children at once in order to increase their chances of success,³⁹ when targeting children in public places, localised groomers seem to pursue small groups of girls.

The second stage of engaging in communication may involve the offer of a lift, an invitation to a party, or access to free drugs and/or alcohol, as in the Derby case for instance.⁴⁰ Targeting small groups of girls can improve the groomers’ chances of engaging in conversation with potential victims who perceive that there is safety in numbers. Potential victims may also feel safe if one or more of the girls in the group have met with the groomers before and ask them to get into the groomers’ car with them. CEOP has highlighted the way in which friendships between victims can be manipulated in order to instil confidence in the groomers.⁴¹ Peer pressure can be utilised effectively to persuade victims to engage in initial communications and, subsequently, to agree to do what groomers ask of them. Moreover, the friendship between victims can ensure secrecy and prevent their disclosure of abuse as they might not want to get into trouble or may validate their experiences as commonplace.⁴² GLG can also involve using one victim to gain access to other potential victims, ‘encouraging them to bring their friends to pre-arranged meetings’,⁴³ thereby increasing the chances of successfully grooming more children. For instance, Abdul Rauf, one of the convicted

³⁴ Department of Education, *Tackling Child Sexual Exploitation Action Plan* (2011), at:

< <https://www.education.gov.uk/publications/standard/publicationDetail/Page1/DFE-00246-2011>>.

³⁵ This method of locating victims has been referred to as the ‘cruise’ approach to GLG. See CEOP, n 8 above, p 28.

³⁶ *Ibid*, at p 5. See also A. Kosaraju, ‘Grooming: Myth and Reality of Child Sexual Exploitation’ (2008) 246 *Childright* 14, at 15.

³⁷ CEOP, n 8 above, at p 57.

³⁸ Research suggests that some victims are targeted because of their low self-esteem or because they come from broken families. Craven et al., n 5 above, at p 292.

³⁹ A-M. McAlinden, ‘“Setting ‘Em Up”: Personal, Familial and Institutional Grooming in the Sexual Abuse of Children’ (2006) 15(3) *Social & Legal Studies* 339, at p 346.

⁴⁰ BBC News, n 4 above.

⁴¹ CEOP, n 8 above, at p 87.

⁴² Ost, n 5 above, at p 35; H Beckett, *Not a World Away* (Barnardo’s Northern Ireland, 2011), at p 47, at < http://www.barnardos.org.uk/13932_not_a_world_away_full_report.pdf>.

⁴³ CEOP, n 8 above, at p 87; Barnardo’s, *Puppet on a String* (Barnardo’s, 2011), at < http://www.barnardos.org.uk/ctf_puppetonstring_report_final.pdf>, at p 7.

groomers in the Rochdale case, asked a fifteen-year-old victim if she had any younger friends.⁴⁴ Such methods could allow groomers to initiate contact with younger children whom they might not normally be able to gain access to.⁴⁵

C Stage 3: establishing a level of trust and a relationship

At stage three, victims are given the impression that they are in a loving and exclusive relationship with the groomer.⁴⁶ This stage does not take place over a consistent period of time and its duration may be depend on the victim's vulnerability to grooming.⁴⁷ In common with other forms of grooming, victims are flattered, taken out for meals and bought gifts such as jewellery,⁴⁸ causing some to feel like they have fallen in love with the perpetrator.⁴⁹ However, flattering comments and deception are only a small part of the grooming behaviours employed to gain the girls' trust. One Rochdale victim stated that she would get 'free alcohol and cigarettes, food [and] free taxis'.⁵⁰ These 'rewards' and gifts played a vital role in the grooming process, enabling the men to eventually get the victims to acquiesce in sexual acts. Indeed, one victim said of her groomers/abusers, 'they're just brainwashing you so you think you love them so you do what they say'.⁵¹ This can be easier to achieve if the groomer is someone likely to be attractive to adolescent girls. Sentencing one of the perpetrators in the Rochdale case, the judge commented that 'I believe that you were there to attract young girls because of your own youth and to give a veneer of respectability to an otherwise suspicious set up'.⁵²

Creating the impression of a boyfriend/girlfriend relationship enables the perpetrator to gradually de-sensitise the adolescent to sexual activity without revealing his true (abusive and exploitative) intentions. Once under the impression that they were with an 'older boyfriend', some victims in cases referred to by CEOP were then used to recruit other victims.⁵³ Also, as has been found more generally in the context of grooming, the illusion of an 'exclusive' relationship helps create distance between the adolescent and her parents/carers, making it less likely that they will discover the interactions between her and the groomer⁵⁴ and report their suspicions to the police. Furthermore, adolescent naivety and inexperience can result in victims 'normalising' their experiences. They may withhold disclosure because they think the grooming behaviour is usual behaviour in a relationship, or for fear of getting in trouble for being in a relationship with an older man.⁵⁵

Having outlined the stages of the GLG process, we now turn to the C/ASAE that GLG leads to, before analysing GLG's nature as a form of multiple perpetrator sexual offending.

⁴⁴ BBC News, n 4 above.

⁴⁵ In a different grooming context, see J Mooney, 'Protecting Children from the Risk of Harm? A Critical Review of the Law's Response(s) to Online Child Sexual Grooming in England and Wales', in S van der Hof, B van den Berg and B Schermer (eds), *Youth And The Internet – Regulating Online Opportunities And Risks* (Springer Press 2013), (forthcoming).

⁴⁶ This has been referred to as the 'boyfriend model of exploitation'. Barnardo's, n 43 above, at p 6.

⁴⁷ CEOP, n 8 above, at p 28.

⁴⁸ 'Children as young as 10 "groomed for sex by gangs"', BBC News, 7 January 2011, at <<http://www.bbc.co.uk/news/uk-12202489>>; 'Heywood: Rochdale town at the centre of child sex ring', BBC News, 8 May 2012, at <<http://www.bbc.co.uk/news/uk-england-manchester-17899841>>.

⁴⁹ CEOP, n 8 above, at pp 27 and 50. In a broader context, see J Wolak, D Finkelhor, K Mitchell and M Ybarra, 'Online "Predators" and Their Victims' (2008) 63(2) *American Psychologist* 111. See also Ost, n 5 above, at p 77.

⁵⁰ 'Grooming victims recalls her ordeal', BBC News, 8 May 2012, at <<http://www.bbc.co.uk/news/uk-17996669>>.

⁵¹ 'Rochdale grooming case: victim's story', BBC News, 8 May 2012, at <<http://www.bbc.co.uk/news/uk-england-manchester-17914138>>.

⁵² See n 33, at p 1. See also McAlinden, n 11 above, at p 116.

⁵³ CEOP, n 8 above, at p 15.

⁵⁴ McAlinden, n 39 above, at p 347.

⁵⁵ CEOP, n 8 above, at p 50.

The exploitation and abuse that occurs after the GLG process

In common with other forms of grooming discussed in the existing literature, some GLG initially involves one perpetrator⁵⁶ and there are parallels, for example, with the initial stages of online grooming that Rachel O'Connell's research has revealed (friendship forming, relationship forming and exclusivity).⁵⁷ However, there is then a clear difference as GLG goes further than 'one to one' grooming which tends to be employed to facilitate the victim's sexual abuse by the particular groomer. At the point at which successful GLG enables sexual abuse, although initially the victims may be abused by one group member, the reported cases indicate that this then leads on to sex with other members of the group and sometimes beyond. In other cases such as that which occurred in Derby, more than one perpetrator is involved right from the start of the grooming process. GLG thus appears to (deliberately) facilitate wider C/ASAE.

Some GLG such as that in the Derby case stops at sexual activity with those in the group, the 'internal trafficking' of the victim. Internal trafficking is the process by which young people are moved for relatively short periods of time in the confines of selected areas or locations for abuse and exploitation by a particular group of individuals.⁵⁸ GLG victims have reported that they often experienced a 'disorientating effect' caused by offenders moving them around and between large towns.⁵⁹ Some of the perpetrators in the Rochdale case worked at local taxi firms and would transport victims from one place to another, deceiving girls by claiming they were giving them 'free taxi rides'.⁶⁰ This form of 'internal trafficking' can be used to gain even greater control over victims if the girls are taken to other places they are unfamiliar with, thereby increasing their vulnerability and reliance on the groomer.⁶¹ Furthermore, perpetrators may well be engaging in risk management,⁶² since taking victims to other areas lessens the risk of being identified. Other GLG moves onto wider sexual exploitation involving sex with individuals for money, kidnapping and trafficking beyond the group.⁶³ One victim from Rochdale reported how she thought it was 'normal' for a boyfriend to ask that you sleep with his friends for money.⁶⁴

Notably, parallels with the recruitment of children for prostitution,⁶⁵ the different stages of GLG and the sexual exploitation and abuse subsequent to GLG are apparent.⁶⁶ Recent ethnographic fieldwork involving interviews with pimps labelled by the media as 'loverboys' ('young men who use their seduction skills with the aim of exploiting young girls as prostitutes')⁶⁷ in the red-light district of Amsterdam has revealed that these pimps often selected vulnerable girls. They subsequently manipulated the girls into thinking that they were in love with them and made them cut ties with their families and friends. Then, according to one interviewee, 'Eventually, there comes a time when the girl who gets everything from her man is expected to do something for him in return...' and according to

⁵⁶ Kosaraju, n 36 above, at p 15.

⁵⁷ O'Connell, n 17 above, at pp 8-9.

⁵⁸ A. Marie and P. Skidmore, *A summary report mapping the scale of internal trafficking in the UK based on a survey of Barnardo's anti-sexual exploitation and missing services* (Barnardo's, 2007), at p 1, at: http://www.barnardos.org.uk/internal_trafficking_final_report_aug07.pdf.

⁵⁹ CEOP, n 8 above, at p 51.

⁶⁰ 'Nine men found guilty in Rochdale grooming case', *Manchester Evening News*, 8 May 2012.

⁶¹ CEOP, n 8 above, at p 27.

⁶² Whittle et al., n 17 above, at p 65.

⁶³ Kosaraju, n 36 above, at p 15.

⁶⁴ BBC News, n 4 above. See also "'Thousands of children' sexually exploited by gangs', BBC News, 13 October 2011, at <http://www.bbc.co.uk/news/education-15289012>.

⁶⁵ We recognise that there are concerns regarding the use of the term 'prostitute' in the context of children. See AA Gillespie 'Prostitution or Abuse? The Sexual Offences Act 2003' [2005] *Crim LR* 285; Beckett, n 42 above, at p 50; n 136 below.

⁶⁶ See, e.g., S Swann, *Whose Daughter's Next?* (Barnardo's, 1998).

⁶⁷ M van San and F Bovenkerk, 'Secret Seducers: True Tales of Pimps in the Red Light District of Amsterdam' (2013) *Crime, Law and Social Change*, DOI 10.1007/s10611-013-9436-z, 1.

another, 'The girls are so in love by then that they are willing to turn tricks just this once if I say I need the money. After a couple of days, it is like the most ordinary thing in the world.'⁶⁸ Thus, we suggest that GLG perpetrators are not engaging in a new phenomenon of recruiting and manipulating victims prior to sexually abusing and exploiting them, but, rather, they are employing and moulding such techniques to operate effectively in a specific, multi-perpetrator context.

B

GLG and any subsequent C/ASAE as a form of multiple perpetrator sexual offending

'The dynamics of multiple perpetrator sexual offenses are clearly very different from cases involving lone perpetrators... A social element is introduced as well as other aspects such as... how roles within the abuse are allocated...'⁶⁹

According to CEOP's assessment of localised grooming, '[o]ffenders often act in concert, establishing a relationship with a child or children before sexually exploiting them.'⁷⁰ The Office of the Children's Commissioner defines 'child sexual exploitation by a group' as involving 'people who come together... for the purpose of setting up, co-ordinating and/or taking part in the sexual exploitation of children in either an organised or opportunistic way.'⁷¹ The involvement of a number of perpetrators is a significant characteristic of GLG in terms of the dynamics of grooming and the consequent abuse and exploitation, however further research is needed to explore the organisation of localised grooming groups, as CEOP emphasises:

'there are intelligence gaps relating to the organisation of offender groups. It is difficult to determine whether such groups are organised or opportunistic. The roles played by different group members cannot be ascertained in many cases. However, in some cases, it appears that members of groups have particular functions. For example, a nominal may allow others to use his property as a location in which sexual exploitation will occur, or particular group members will groom victims before introducing the child to other members of the group who will also sexually exploit him or her.'⁷²

The group in the Rochdale case appears to have been organised with one or two offenders at the helm. In sentencing one of the offenders, Abdul Aziz, Clifton J commented: 'You are an intelligent man, referred to by some of your co-accused as The Master. You took over from [A] and ran this operation with [X]'.⁷³ Similarly, the Derby group was organised with two leaders.⁷⁴ CEOP's assessment found that some localised grooming groups include a core network member responsible for identifying and engaging in communication with victims. However, others are more peripheral group members who are less heavily involved in such activities and adopt a more opportunistic approach to abuse.⁷⁵

Limited research exists upon multiple perpetrator sexual offending against children (MPSOAC). One reason for this is that MPSOAC often goes undetected and it is likely that,

⁶⁸ Ibid., at pp 6-7.

⁶⁹ L Harkins and L Dixon, 'Sexual Offending in Groups: An Evaluation' (2010) 15 *Aggression and Violent Behaviour* 87, at p 88.

⁷⁰ CEOP, n 8 above, at p 5.

⁷¹ OCCi, n 2 above, at p 10.

⁷² CEOP, n 8 above, at p 46.

⁷³ See n 33 above, at p 2.

⁷⁴ 'Derby sex abuse gang leaders jailed', *The Guardian*, 7 January 2011.

at <<http://www.guardian.co.uk/uk/2011/jan/07/derby-sex-gang-leaders-jailed>>.

⁷⁵ CEOP, n 8 above, p.87.

in part, this is because victims are commonly inhibited from disclosing their abuse,⁷⁶ as has occurred in GLG cases. What is clear is that ‘multiple perpetrator sexual offending is not a homogenous crime’.⁷⁷ Leigh Harkins and Louise Dixon have explored variants of MP SOAC such as that occurring in the context of paedophile organisations, child sex rings, and in day care and residential care settings.⁷⁸ The greatest similarities appear to exist between GLG and child sex rings (more recently referred to as ‘network abuse’ in the literature),⁷⁹ which consist of men who are aware that they share a sexual interest in children and work together to identify victims, sharing these victims and possibly becoming involved in group abuse.⁸⁰ In the existing sparse and dated research on child sex rings, Ann Burgess and Christine Grant have differentiated between transitional and syndicated child sex rings in the context of rings involving multiple perpetrators.⁸¹ Transitional rings consist of adults who are sexually involved with pubescent children, as in the Derby GLG case, for instance. Syndicated rings involve more organised recruitment of victims and the use of victims as prostitutes for other abusers, therefore bearing something of a similarity to the Rochdale GLG case.⁸² Victims of child sex rings can be coerced into recruiting other victims⁸³ and research studies have found that some victims are given drugs and money to participate,⁸⁴ as can occur in GLG. Harkins and Dixon have highlighted the real need for more contemporary research on child sex rings⁸⁵ and we submit that such research could fruitfully explore whether instances of GLG are a modern day version of such rings.

C

Cognitive distortions

Applying existing theoretical frameworks to MP SOAC, Harkins and Dixon postulate that cognitive distortions play a role in such offences. ‘Cognitive distortions in sex offenders are specific or general beliefs/attitudes that violate commonly accepted norms of rationality, and which have been shown to be associated with the onset and maintenance of sexual offending.’⁸⁶ Individuals in the group may ‘use cognitive restructuring to avoid the negative feelings associated with inappropriate behaviour’, such as the notion of children as sexual beings.⁸⁷ The prevailing assumption that appears to have been made by the perpetrators (of South-Asian descent) in the Derby and Rochdale cases is that the victims (primarily white British teenage girls) were worthless and could be used as sexual objects, thus minimizing any feelings that they were engaging in wrongful behaviour. When sentencing offenders in the Rochdale case, Clifton J stated the men treated the girls ‘as though they were worthless and beyond all respect’ and expressed his belief that one of the reasons why the victims were treated in this way was because ‘they were not of [the offenders’] community or religion.’⁸⁸ Whilst it is beyond the scope of this paper to explore ethnicity and cultural issues raised by the reported GLG cases, we note that these issues may warrant further exploration in future research examining the characteristics of this form of MP SOAC. However, the matter is controversial. One author has contended that the perpetrators in the Rochdale case should have been prosecuted for hate crimes, whilst another has argued that an ‘Asian

⁷⁶ M Salter, *Organised Sexual Abuse* (Routledge, 2013), at pp 27 and 30-31.

⁷⁷ Harkins and Dixon, n 69 above, at pp 88 and 91; Salter, *ibid.*, at p 13.

⁷⁸ Harkins and Dixon, *ibid.*, at pp 91-92.

⁷⁹ Salter, n 76 above, at p 29.

⁸⁰ *Ibid.*, at p 91. See also OCC1, n.2 above, at p 35.

⁸¹ AW Burgess and CA Grant, *Children Traumatized in Sex Rings* (National Center for Missing & Exploited Children, 1988), at chapter 2.

⁸² *Ibid.*, at p 92.

⁸³ NJ Wild and JM Wyne, ‘Child Sex Rings’ (1986) 293 (July) *British Medical Journal* 183.

⁸⁴ *Ibid.*, at p 184; N.J. Wild, ‘Prevalence of Child Sex Rings’ (1989) 83(4) *Pediatrics* 553.

⁸⁵ Harkins and Dixon, n 69 above, at p 92.

⁸⁶ CÓ Ciardha and T Ward, ‘Theories of Cognitive Distortions in Sexual Offending: What the Current Research Tells Us’ (2013) 14(1) *Trauma, Violence and Abuse* 5, at p 6.

⁸⁷ Harkins and Dixon, n 69 above, at p 93. This is one of the core implicit theories that Ward and Keenan have suggested that child sex offenders use. T Ward and T Keenan, ‘Child Molesters’ Implicit Theories’, (1999) 14 *Journal of Interpersonal Violence* 821, at pp 827-832.

⁸⁸ See n 33 above, at p 1.

sex gang' crime threat has been constructed by the media.⁸⁹ Contrasting views as to whether race and culture are factors in the recent cases of GLG have been expressed to the Commons Select Committee on Localised Child Grooming.⁹⁰

Being part of a group can serve to reinforce cognitive distortions, create feelings of power, status and belonging and can lead to 'diffusion of responsibility'.⁹¹ It has been argued that MP SOAC can allow group members to feel a shared sense of power and masculinity, to the extent that 'the role of the child may become little more than an object within the group's 'collective performance of masculinity'.⁹² Tony Ward and Allannah Casey have posited that a significant causal factor for cognitive distortions is the external context of the individual's life, including their social network and interactions with others.⁹³ Whilst more research is needed on the motivations and psychological profiles of members of localised grooming groups, CEOP has found that:

'those who groom, abuse and share vulnerable children among like-minded associates may use sex with children as a means of feeling powerful and achieving status and prestige within the group. Those on the periphery of the group may be characterised differently, where their offending behaviour is more opportunistic, and sex with a child or young person is used as a substitute for sex with an adult.'⁹⁴

In sum, the hallmarks of multiple perpetrators acting together in GLG cases are: collusion, organisation and reinforcement of cognitive distortions. Clearly, however, further research is needed to explore the significance of the group dynamics involved in GLG.⁹⁵ We now focus our attention upon a number of social and legal challenges that GLG raises, challenges which add to the difficulties of tackling this phenomenon.

A SOCIAL AND LEGAL CHALLENGES

B Adolescent vulnerabilities and non-ideal victims

The Deputy Children's Commissioner has stated that 'accurate data is essential' in order to identify and safeguard victims who are *particularly* vulnerable to sexual exploitation by gangs and groups.⁹⁶ As this section will demonstrate, greater understanding of the victimisation of adolescents is required because GLG seems to enable perpetrators to target and exploit adolescents who have an obvious vulnerability (those in local authority care, for example) and adolescents who appear to have no particular vulnerability. Misconceptions that this form of abusive behaviour is *only* targeted at adolescents who are in local authority care

⁸⁹ MA Walters, 'Why the Rochdale Gang Should Have Been Sentenced as "Hate Crime" Offenders' [2013] Crim LR 131; E Cockbain, 'Grooming and the "Asian Sex Gang Predator": the Construction of a Racial Crime Threat' (2013) 54(4) *Race & Class* 22.

⁹⁰ See, for example, Home Affairs Committee, n 3 above, oral evidence 12 June 2012, Q 130-133, at <<http://www.publications.parliament.uk/pa/cm201314/cmselect/cmhaff/68/120612.htm>>; oral evidence, 4 December 2012, Q 632-640, at <<http://www.publications.parliament.uk/pa/cm201314/cmselect/cmhaff/68/121204.htm>>; oral evidence, 3 July 2012, Q 154-158, at <<http://www.publications.parliament.uk/pa/cm201314/cmselect/cmhaff/68/120703.htm>>; See also McAlinden, n 13 above, at p 117.

⁹¹ Harkins and Dixon, n 69 above, at p 96; Salter, n 76 above, at p 24; OCCI, n 2 above, at p 35.

⁹² Salter, *ibid*, at p 23.

⁹³ T Ward and A Casey, 'Extending the Mind into the World: A New Theory of Cognitive Distortions in Sex Offenders' (2010) 15 *Aggression and Violent Behaviour* 49; See also Salter, *ibid*, at p 16.

⁹⁴ CEOP, n 8 above, at p 29.

⁹⁵ We note that the Sentencing Council has recently highlighted the added culpability dimensions that group offending brings to sexual abuse. Sentencing Council, *Sexual Offences Guideline Consultation* (Stationary Office, 2012), at p 20.

⁹⁶ Sue Berelowitz, Deputy Children's Commissioner, available at: http://www.childrenscommissioner.gov.uk/content/press_release/content_443.

distract from the possibility that other adolescents can be targeted by GLG. In fact, C/ASAE can be ‘targeted at boys, girls, older and younger children, from stable and affluent homes as well as from less advantaged backgrounds, in urban and rural communities’.⁹⁷ Moreover, the power of the grooming process and the categorisation of some adolescents as non-ideal victims mean that they do not perceive themselves as victims and are not considered to be as such by others. Consequently, victims may not disclose their abuse and exploitation, and/or social care workers, law enforcement agents and prosecutors can fail to recognise the harm caused, as we will discuss.

C

Victim vulnerabilities

Previous literature on sexual grooming has shown how would-be abusers have been able to target particular vulnerabilities during the victimisation process and can then manipulate their grooming technique in a way that is tailored to meet a child’s/adolescent’s needs in order to ensure their success.⁹⁸ Further to this, Conte et al. have shown that child sex offenders seem to have a special ability to recognise vulnerable children.⁹⁹ Consequently, groomers’ victim selection often includes targeting children/adolescents with specific vulnerabilities: those who are emotionally deprived, who have low self-confidence and who come from broken families.¹⁰⁰ A particular vulnerability identified within the recent cases of GLG is the association between victimisation and involvement with children’s social care. According to CEOP, of the 896 child/adolescent victims in recent reports on sexual exploitation, 311 were living in local authority care.¹⁰¹ A victim of the Derby GLG case reported that she believed she was targeted because she revealed that she came from a broken home.¹⁰² Children/adolescents from local authority care already have problematic backgrounds, which could make them more susceptible to grooming techniques and they may also have previously displayed some form of challenging behaviour¹⁰³ as a result of their experiences prior to grooming. Moreover, as noted earlier, GLG perpetrators can often deliberately create and/or exacerbate vulnerabilities that victims have, such as disengagement from supportive services,¹⁰⁴ underage drinking and involvement in substance misuse, so that the victim does not disclose the abuse for fear of getting into trouble. Sexual exploitation can result in problematic behaviour, which has led to victims being perceived to be ‘sassy’ or ‘streetwise’, and as posing a risk to other children by the police and social services, who then failed to recognise the signs that they were being exploited.¹⁰⁵ It can also lead to criminal behaviour which then becomes the focus for the authorities.¹⁰⁶

There is a danger, however, that focusing on particular victim characteristics could prevent other victims from being identified. Whilst it is clear that groomers can exploit specific vulnerabilities, the victims in the Derby and Rochdale cases did not all possess obvious vulnerabilities. Indeed, the parliamentary inquiry and recent reports on localised

⁹⁷ OCCL, n 2 above, at p 14; Banardo’s, n.10 above, at p 4; Beckett, n 42 above, at pp 67-69.

⁹⁸ Ost, n 5 above, at pp 34-35.

⁹⁹ Conte et al, n 16 above.

¹⁰⁰ M. Elliott, K. Browne and J. Kilcoyne, ‘Child Sexual Abuse Prevention: What Offenders tell Us’ (1995) 19(5) *Child Abuse and Neglect* 579, at p 584; McAlinden, n 39 above, at p 349; OCCL, n 2 above, at p 83.

¹⁰¹ CEOP, n 8 above, at p 87; Banardo’s, n 10 above, at p 5; A list of vulnerabilities and discussion is provided in Beckett, n 42 above, at pp 34-35.

¹⁰² ‘Victim groomed by “evil” Derby sex gang’, BBC News, 24 November 2010, at <<http://www.bbc.co.uk/news/uk-england-derbyshire-11777553>>.

¹⁰³ Beckett, n 42 above, at p 65. For example, running away from home, truancy from school, smoking and drinking.

¹⁰⁴ Ibid.

¹⁰⁵ CEOP, n 8 above, at p 88; Jago et al., n 10 above, p 50; Rochdale Borough Safeguarding Children Board, *Review of Multi-agency Responses to the Sexual Exploitation of Children* (2012) at p 11, at <<http://www.rbscb.org/CSERreport.pdf>>.

¹⁰⁶ Howard League for Penal Reform, *Out of Place: the Policing and Criminalisation of Sexually Exploited Girls and Young Women* (2012), at <<http://www.howardleague.org/out-of-place-summary/>>.

grooming emphasise that it is not only those in care who are victims to this form of abuse,¹⁰⁷ and suggest that perpetrators can target more generic adolescent vulnerabilities such as the desire to have a(n older) boyfriend.¹⁰⁸ There may be a parallel here with internet offending and online groomers, since Janis Wolak et al have found that deception is more likely regarding the nature of the relationship rather than the perpetrators' identities.¹⁰⁹ Groomers who deceive adolescents into believing that they are willing and consenting participants in 'loving' relationships can manipulate and exacerbate vulnerability in two main ways.

First, groomers targeting victims who are looking to form an intimate relationship exploit adolescents' naivety by giving them attention and affection, thereby increasing the victim's trust. Secondly, adolescents who believe they are a "consenting" party¹¹⁰ to the relationship may fail to recognise the nature of their abuse. As James Dignan has observed, '[b]ecoming a victim... is a social process that... requires a cognitive decision by the person(s) against whom it is directed to see themselves as, and assume the status of, victims as part of their strategy for coping with it.'¹¹¹ In both the Derby and Rochdale cases, girls believed that they had intimate relationships with the men.¹¹² Since the grooming process is one of 'emotional seduction',¹¹³ this suggests that forming the illusion of an intimate relationship is one of the most effective ways to manipulate adolescents' vulnerability.

Notably, adolescent vulnerability to GLG does not cease for those over the age of sixteen. Whilst there might be a general perception that younger children are more vulnerable due to a lesser ability to protect themselves, older adolescents should not be overlooked as potential victims.¹¹⁴ Research suggests that a failure to recognise the effect that grooming has on the capacity to consent to sexual behaviour is more common in relation to adolescents who are deemed by law to have capacity to consent to sexual intercourse.¹¹⁵ Yet whilst these adolescents can give lawful consent to sexual intercourse, this is *irrelevant* in the context of grooming, since the nature of exploitative relationships restricts or severely limits the victim's ability to exercise free choice or consent.¹¹⁶ The Department for Children, Schools and Families has recently highlighted the constraints that C/ASAE places upon victims' freedom to make choices, noting that 'involvement in exploitative relationships [is] characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability'.¹¹⁷ It is therefore disturbing that Rochdale Borough Council Safeguarding Children Board's review found that perceptions held by child protection agencies and the police that girls as young as ten years old were 'engaging in consensual sexual activity' and were complicit in their abuse enabled their grooming and exploitation to continue.¹¹⁸ Evidently there is a failure here to understand the effects of C/ASAE. Adolescents' vulnerability to C/ASAE may thus be exacerbated by a failure on the part of some professionals to whom they disclose abuse and exploitation to recognise their victimisation and, consequently, to take their disclosures seriously.

¹⁰⁷ Home Affairs Committee 3 July 2012, n 90 above, Q168; '*Tackling Child Sexual Exploitation Action Plan*', n 34 above, at p 7.

¹⁰⁸ OCCI, n 2 above, at p 101.

¹⁰⁹ Wolak et al. n 49 above.

¹¹⁰ OCCI, n 2 above, at p 48.

¹¹¹ J Dignan, *Understanding Victims and Restorative Justice* (2005) 30; D. Miers, 'Positivist Victimology: A Critique, Part 2: Critical Victimology' (1990) 1 *International Review of Victimology* 219, at p 223.

¹¹² See, e.g., BBC News, n 31 above. See also Ost, n 5 above, at p 77; Beckett, n 42 above, at p 5.

¹¹³ A Salter, *Transforming Trauma: a Guide to Understanding and Treating Adult Survivors of Child Sexual Abuse* (Sage, 1995), at p 74.

¹¹⁴ Jago et al., n 10 above, at p 43.

¹¹⁵ *Ibid*, at p 50. See also Department for Children, Schools and Families, *Safeguarding Children and Young People from Sexual Exploitation* (Department for Children, Schools and Families, 2009) DCSF-00689-2009, at p 46.

¹¹⁶ '*Tackling Child Sexual Exploitation Action Plan*', n 34 above; Beckett n 42 above, at p 9.

¹¹⁷ Department for Children, Schools and Families, n 115 above, at p 9.

¹¹⁸ Rochdale Borough, n 105 above, at p 9. See also OCCI, n 2 above, at p 47.

Non-ideal victim status

Critical victimology approaches are relevant in emphasising how the ascription of victim status is a social process and in exploring the considerations that are taken into account in applying the label of victim.¹¹⁹ Generally, the possession of characteristics of blameworthiness and vulnerability make the child the archetypical 'ideal victim', 'a person or a category of individuals who – when hit by crime - most readily are given the complete legitimate status of being a victim'.¹²⁰ However, some of the responses from social workers, the police and prosecutors to the C/ASAE in GLG cases suggest the existence of perceptions of *non-ideal* adolescent victims who consented to their own exploitation and sought out the attention bestowed upon them.¹²¹ Indeed, the Director of Public Prosecutions recently commented that individuals grooming adolescents for sexual purposes have 'escaped justice for decades because police, prosecutors and the courts failed to understand the nature of the abuse'.¹²² And the Office of the Children's Commissioner's Interim Report found that victims have not received the support they required because of a lack of professional understanding about the extent of their victimisation.¹²³

Police investigations of victims' complaints in the Rochdale case were poor,¹²⁴ as was the response to 83 referrals made to Rochdale Borough Council by the NHS sexual health services team between 2004-2010.¹²⁵ Following complaints to the police in 2008 by one of the victims, prosecutors made the decision not to bring any charges because they considered the victim would be an 'unreliable witness'.¹²⁶ In sum: 'A common disclosure by the young people was that even when they co-operated with agencies, nothing changed, the abuse continued'.¹²⁷ Hence CEOP's caution that:

'Agencies involved in identifying and safeguarding sexually exploited children and young people, including the police, must recognise that victims are unlikely to present as victims of a sexual offence and are likely to be hostile to engagement. Agencies must be aware that the length of time between incidents of exploitation and disclosure to the authorities is not a symptom of unreliability, but a direct result of exploitation.'¹²⁸

Cases in which 'the child victim is not completely "good"' because, for instance, she 'willingly traded sex for material rewards', involve perceived self-inflicted suffering¹²⁹ and a failure to conform with the idealised social construction of the 'normal' child. They are consequently amongst the most problematic for society to deal with. In a recent case in which perpetrators

¹¹⁹ Miers, n 111 above, at p 224. See generally R. Mawby and S. Walklate, *Critical Victimology: International Perspectives* (Sage, 1994).

¹²⁰ N Christie, 'The Ideal Victim', in E Fattah (ed), *From Crime Policy to Victim Policy: Reorienting the Justice System* (Macmillan, 1986), at p 18 (emphasis in original).

¹²¹ OCCJ, n 2 above, at p 47.

¹²² 'We failed a generation of grooming victims, says law chief', *The Times*, 24 October 2012.

¹²³ OCCJ, n 2 above, at p 50.

¹²⁴ Rochdale Borough, n 105 above, at p 9; 'Rochdale grooming report timeline: Suzie's Story', BBC News, 27 October 2012, at <<http://www.bbc.co.uk/news/uk-england-manchester-19744617>>.

¹²⁵ 'Rochdale police and council "repeatedly warned" about sex abuse risk in town', *The Guardian*, 27 September 2012.

¹²⁶ Ibid. The Chief Constable of Greater Manchester has stated that prosecutors did not proceed with cases because they feared victims would not be believed. See Home Affairs Committee 12 June 2012, n 90 above, Q 64. A report into the decisions not to prosecute taken regarding allegations of sexual offending committed by Jimmy Savile revealed similar constructions of victims as unreliable witnesses. Indeed, the DPP stated that 'there are clear links to be drawn between these cases and the approach taken in other cases involving vulnerable victims of sexual abuse... the findings in [the] report echo in many respects the finding of the recent reviews into the so-called "grooming" cases'. See 'DPP statement on Savile cases', 11 January 2013, at <http://www.cps.gov.uk/news/latest_news/dpp_statement_about_savile_cases/index.html>.

The report can be found at <http://www.cps.gov.uk/news/assets/uploads/files/savile_report.pdf>.

¹²⁷ 'Rochdale police', n 125 above.

¹²⁸ CEOP, n 8 above, p 88.

¹²⁹ Lanning, n 12 above, at pp 45 and 53; Miers, n 111, at p 222.

paid adolescent girls for sex, media reports suggest that the victims were aware what the men wanted and were complicit in this. One report states that the gifts were given ‘to encourage [the girls] to have sex with [the perpetrators]’.¹³⁰ In another, a police officer is reported as stating that ‘[t]he girls at times felt flattered by the attention and were grateful for the gifts. But they gradually realised that what they were involved in was *wrong*, they were *putting themselves at risk* and the men were exploiting them.’¹³¹ This evidences a construction of the victims as having done something wrong and being in some way complicit in their victimisation. These perceptions are not new. Police officers involved in a study by one of the authors expressed concern that some young teenagers who are groomed may be perceived to have encouraged the groomer.¹³² This blaming of victims for putting themselves in a position that makes their abuse and exploitation more likely reflects one of Nils Christie’s attributes of the non-ideal victim.¹³³ Furthermore, the fact that groomers can induce their victims to ‘recruit’ more victims, as we have discussed, can lead to the adolescent being perceived as being both a victim and a perpetrator of sexual exploitation.¹³⁴ The terminology used in legal discourses may encourage such constructions of non-ideal victims. As an example here, numerous offences under the Sexual Offences Act 2003 (SOA) refer specifically to child prostitution.¹³⁵ The Children’s Commissioner’s Interim Report raises concerns that terminology such as ‘child prostitutes’ advances misconceptions of children/adolescents as agents of their own abuse. The Report recommends that to discourage such misconceptions, legislation and guidelines should replace references to children as prostitutes with the term *child sexual exploitation*.¹³⁶

There is a real danger that the harm caused to adolescent victims who do not meet societal expectations of the ‘ideal’ victim is overlooked or underplayed and consequently, this may have a damaging impact on these victims. Kenneth Lanning contends that social constructions such as those we have discussed here have effects such as ‘[v]ictims failing to disclose and even denying their sexual victimisation’ and a ‘[l]ifetime of victim shame, embarrassment, and guilt’.¹³⁷ Thus, the end result could be victims not coming forward either because they do not see themselves as victims (note that a non-ideal victim identified by Christie is ‘the ignorant victim, one victimized without knowing’),¹³⁸ or for fear of the reaction they will receive. In sum, therefore, perceptions of non-ideal victims of GLG and misconceptions of ‘consensual’ grooming and exploitation could blind victims¹³⁹ and society to the harm suffered. In addition, as we will now show, the matching of the harms of GLG to offences is not by any means a straightforward task.

B

Which offences fit best? GLG and the criminal law

On the face of it, the s.15 offence related to grooming under the Sexual Offences Act 2003 (SOA) would seem the most obvious one with which to tackle GLG. The behaviour criminalised by s.15 is meeting, travelling to meet or arranging to meet a child following at

¹³⁰ ‘Five men found guilty of paying for sexual services of children in Derby’, *The Guardian*, 14 July 2012.

¹³¹ ‘Five guilty of preying on vulnerable girls in Derby sex abuse case’, *The Independent*, 13 July 2012 (emphasis added).

¹³² See Ost, n 5 above, at p 236. See also McAlinden, n 11 above, at pp 239-240.

¹³³ Christie, n 120 above, at p 19. There are parallels here with practitioners’ responses to trafficked children recounted in J. Pearce, ‘Working with Trafficked Children and Young People: Complexities in Practice’ (2011) 41 *British Journal of Social Work* 1421, at pp 1428-1432.

¹³⁴ Barnardo’s, n 10 above, at p 7.

¹³⁵ Ss.47, 48, 49 and 50. For the purposes of these offences, “prostitute” means a person (A) who, on at least one occasion and whether or not compelled to do so, offers or provides sexual services to another person in return for payment or a promise of payment’ (s.51(2)).

¹³⁶ OCCI, n 2 above, at pp 17-18. See also TA Menaker and AK Miller, ‘Culpability Attributions towards Juvenile Female Prostitutes’ (2013) 22 *Child Abuse Review* 169.

¹³⁷ Lanning, n 12 above, at pp 50-51.

¹³⁸ Christie, n 120 above, at p 23.

¹³⁹ For victims’ own misunderstandings of their ‘consent’ to their abuse, see OCCI, n 2 above, at p 48.

least two prior communications or meetings (or a combination of the two) when the intention is to commit a sexual offence against the child during the meeting.¹⁴⁰ The offence is 'intended to cover situations where an adult establishes contact with a child through, for example, meetings, telephone conversations or communications on the Internet, and gains the child's trust and confidence so that he can arrange to meet her for the purpose of committing a "relevant offence" against the child'.¹⁴¹ The meetings or communications that occur prior to the arranged meeting 'need not have an explicitly sexual content'.¹⁴² Contrary to common misconceptions,¹⁴³ grooming per se is not criminalised by this offence.

Consequently, whilst GLG itself would not be criminal behaviour under s.15, it is possible that the offence could be made out where the groomer has engaged in at least two communications or meetings with the victim prior to the meeting at which it is intended that the sexual abuse will first occur. However, proof of any such communications or meetings may be difficult to acquire unless there is evidence by way of text messages, emails, CCTV surveillance or witness testimony, for instance. In addition, if the police wish to step in before the arranged meeting when the sexual abuse will occur, they would need evidence of the groomer's intention to commit a sexual offence against the child at that meeting. These challenges are not in fact particular to GLG, but are present in any grooming context where evidence of the groomer's harmful intent does not exist by way of a record of a course of communications. The s.15 offence is therefore often a more effective weapon in the criminal law's armoury in the context of grooming via modern technologies, where a record of emails, online messages or texts may exist.¹⁴⁴ The difficulty of gaining evidence has previously been highlighted by police officers working in this area.¹⁴⁵ However, as awareness of grooming and GLG in particular has increased, it may now be more likely that evidence can be obtained by way of witness testimony, for example.¹⁴⁶

There were no charges of the s.15 offence in either the Derby or Rochdale cases.¹⁴⁷ This is not surprising given that other more substantive offences were committed and, therefore, the charges reflected this. However, the stated aim of the s.15 offence is to prevent the occurrence of child sexual abuse and so if this offence cannot be utilised in other cases because of the difficulties noted above, can any other offence be used to enable the police to step in before C/ASAE occurs in GLG cases? One possibility is the offence under s.14 of the SOA of intentionally arranging or facilitating any action that the individual intends to do or intends another person to do or believes that another person will do, if this action would constitute a sexual offence against a child under ss.9-13 of the SOA.¹⁴⁸ This offence has been utilised to catch other grooming behaviour and has been referred to by the Court of Appeal as an 'offence of grooming'.¹⁴⁹ There is no need for a substantive offence to occur, provided there is evidence that the action which the groomer intended he or another committed amounted to an offence. Take, for instance, an individual who begins the GLG process, selecting a victim and offering her alcohol if she comes for a ride in his car, with the intention of facilitating his sexual activity with her. Surveillance such as that undertaken in

¹⁴⁰ We note that this offence only applies in England and Wales. Scotland and Northern Ireland, for example, have their own equivalent provisions. See further The Sexual Offences (NI) Order, Part 3, article 22.

¹⁴¹ *Sexual Offences Act: Explanatory Notes* (2004), at p 27.

¹⁴² *Ibid.*

¹⁴³ See, e.g., 'Man charged with grooming offence', BBC News, 4 June 2006, at <news.bbc.co.uk/1/hi/england/coventry_warwickshire/5046164.stm>.

¹⁴⁴ See also McAlinden, n 39 above, at p 342.

¹⁴⁵ See, e.g., Ost, n 5 above, at pp 73-74.

¹⁴⁶ See n 177 below.

¹⁴⁷ We note that it was successfully utilised against one defendant in another localised grooming case. See <http://www.thelawpages.com/court-cases/Ahdel-Ali-9201-1.law.>>; 'Telford brothers convicted of child sex offences', BBC News, 8 August 2012, at <<http://www.bbc.co.uk/news/uk-england-shropshire-19181714>>.

¹⁴⁸ These offences criminalise sexual activity with a child (s.9); inciting a child to engage in sexual activity (s.10); engaging in sexual activity in the presence of a child (s.11); causing a child to watch a sexual act; and this same behaviour where the perpetrator is under 18 (s.13).

¹⁴⁹ *R v Harrison* [2005] EWCA Crim 3458, para 13.

the Derby case,¹⁵⁰ proactive policing and witness testimony may enable law enforcement officers to gather evidence of an intention to facilitate this offence. Or, as a further example, an individual gives the key to his house to another group member so that he can take a victim there. If he does this intending to facilitate the other person committing the offence of sexual activity with a child, or believing that he do so, he would commit this offence.

A further option that has been pursued in some grooming cases is the offence of child abduction under s.2 of the Child Abduction Act 1984, which is committed where an individual takes or detains a child under the age of sixteen without lawful authority or reasonable excuse. This has been used effectively 'to disrupt contact' in investigations into C/ASAE as part of the Awaken Project in Blackpool.¹⁵¹ Because this is not a sexual offence, it 'does not act as a trigger offence for any of the protection measures such as sex offender registration, sex offender orders, etc'.¹⁵² However, it might be possible to utilise s.62 of the SOA, which makes it an offence (for which the offender is subject to notification requirements) to commit any offence with the intent to commit sexual offence *provided* intent to carry out a sexual offence can be established. But the child abduction offence in and of itself was not designed for grooming and thus does not reflect the nature of GLG.

There are a number of inchoate offences that could also be applicable. The first is attempt, with the most likely candidates being attempt to cause or incite a child to engage in sexual activity; to engage in sexual activity with a child; and possibly, to engage in sexual activity in the presence of a child.¹⁵³ The notorious difficulty with the law of attempt is ascertaining at what stage the perpetrators' actions go beyond being merely preparatory.¹⁵⁴ This matter has been explored in the grooming context and, whilst this was regarding now repealed offences, the same fundamental difficulties remain.¹⁵⁵ For our purposes, it suffices to say that GLG would need to have progressed to 'the steps immediately preceding the final act necessary to effect D's plan and bring about the commission of the intended offence'.¹⁵⁶ This means that where the police have evidence that an offence related to C/ASAE is intended, they would have to wait until GLG has progressed to the stage at which the perpetrator(s) is(are) almost at the point of committing the intended offence. Because this could well place the child/adolescent in a dangerous position, it is unlikely to be an option that the police would favour, especially with the potential availability of the s.14 offence.

There is no need to establish that an individual has gone beyond merely preparatory acts in the context of another inchoate offence: statutory conspiracy.¹⁵⁷ For a conspiracy to exist, evidence of an agreement to commit a crime is required. Being involved in grooming can constitute such agreement. For example, in the Rochdale case, Clifton J said of offender Hassan when passing sentence for conspiracy to engage in sexual activity with child, '[y]ou had... been involved in the conspiracy by grooming potential victims'.¹⁵⁸ However, helping another person or persons (merely) with awareness that they are conspiring to commit a crime does not suffice; there must be an actual agreement between the conspirers.¹⁵⁹ It is thus interesting that the judge's sentencing remarks made to another of the perpetrators in the Rochdale case, Aziz, were that: '[a]s far as the conspiracy [to engage in sexual activity

¹⁵⁰ BBC News, n 31 above.

¹⁵¹ Department for Children, Schools and Families, n 115 above, at p 67. At the time of the Report, the team had issued 99 notices under s.2. See also Barnardo's, n 10 above, at p 8.

¹⁵² Gillespie, n 24 above, at p 242.

¹⁵³ Ss.10, 9 and 11 of the SOA respectively.

¹⁵⁴ As required under s.1(1) of the Criminal Attempts Act 1981.

¹⁵⁵ S Ost, 'Getting to Grips with Sexual Grooming? The New Offence under the Sexual Offences Act 2003' (2004) 26(2) *Journal of Social and Welfare Law* 147, at p 150.

¹⁵⁶ *Moore v DPP* [2010] EWHC 1822, para 26, *per* Toulson J, quoting Law Commission, *Conspiracy and Attempts*, LCCP No. 183. (2007), para 14.5.

¹⁵⁷ S.1(1) of the Criminal Law Act 1977.

¹⁵⁸ See above, n 33, at p 2.

¹⁵⁹ *R v Griffiths* (1965) 49 Cr App R 279.

with a child] count is involved, you were aware that a large number of men were involved and several girls'.¹⁶⁰ It must be assumed that the awareness alluded to here by the judge related to the scale of the C/ASAE rather than indicating that there was only evidence of the defendant's awareness of the plan to commit crimes.

Because no conspiracy exists if the only parties are the defendant and the intended victim, the offence is not generally available in cases of one-to-one grooming involving the groomer and the child/adolescent.¹⁶¹ In the context of GLG, however, the offence reflects the collusion between group members and can catch behaviour prior to the occurrence of abuse because once agreement to commit the offence exists, conspiracy is made out even if the offence does not actually occur.¹⁶² And the offence can give rise to potentially significant sentences; Clifton J gave Aziz nine years for conspiracy.¹⁶³ Clearly, then, conspiracy offers potential to capture GLG perpetrators prior to the commission of subsequent offences related to C/ASAE. But the difficulty would be proving the existence of a conspiracy before the sexual offence takes place, with the need to establish intent to agree *and* to carry out the offence.¹⁶⁴ Furthermore, the offence does not reflect the essence of the *grooming* process. Perpetrators involved in GLG do not simply agree to commit an offence; they engage in behaviour that is *integral* to ensuring that the desired criminal act is achieved.

For this reason, the other potentially applicable inchoate offences may be a better match for GLG. These three offences, introduced by the Serious Crimes Act 2007, criminalise acts which are capable of encouraging or assisting an offence, where the individual intended to encourage or assist (s.44), or believed that his actions would encourage or assist an offence or offences (ss.45 and 46). As the conduct only needs to be capable of encouraging or assisting, it seems that any act, even if only providing minimal assistance, would be caught.¹⁶⁵ To return to the example given earlier of a group member giving the key to his house to another member, if he does so either intending to encourage or assist the commission of the offence of rape, or believing that he does so, he could commit one of these offences. If he makes this offer believing that it will assist in the commission of one or more of a number of offences, such as rape, engaging in sexual activity with a child or false imprisonment, he could commit the offence under s.46 even if he is unsure which offence will be committed.¹⁶⁶ Unfortunately, however, as with the law on inchoate and complicity liability generally, these offences contain complex elements when it comes to *mens rea*.¹⁶⁷ In relation to the s.44 offence, for example, the individual (X) must not only have the necessary *mens rea* in relation to his own acts, he must also have *mens rea* regarding 'P's [the person who will commit the anticipated offence] likely *mens rea* if P were to commit the offence'¹⁶⁸ that X anticipates will be committed. Moreover, X must be 'aware of the existence of the proscribed circumstances and/or consequences of the offence that [he] anticipates'¹⁶⁹ will be committed. Therefore, in the context of the most likely offences under the SOA such as engaging in sexual activity with a child, this could include circumstances such as the victim being under sixteen and the perpetrator not reasonably believing that she is sixteen or over, or the victim being under thirteen. In the context of the *mens rea* for the ss.45 and 46 offences, David Ormerod and Rudi Fortson observe that '[b]elief is a *mens rea* concept which has given rise to difficulty in interpretation throughout the criminal law and its boundaries remain ambiguous, lying as it does between the equally vague concepts of

¹⁶⁰ n 33 above, at p 2.

¹⁶¹ S.2(2)(c) Criminal Law Act 1977; *R v Tyrell* [1894] 1 QB 710; Gillespie, n 24 above, at p 241.

¹⁶² See, for example, *DPP v Nock* [1978] AC 979.

¹⁶³ n 33 above, at p 2.

¹⁶⁴ See, for example, *R v Hedgcock* [2007] EWCA Crim 3486.

¹⁶⁵ A Ashworth, *Principles of Criminal Law* (Oxford University Press, 2009), at p 458.

¹⁶⁶ The prosecution must identify which offences it wishes to rely on: *R v Sadique* [2011] EWCA Crim 2872.

¹⁶⁷ See D Ormerod and R Fortson, 'Serious Crime Act 2007: The Part 2 Offences' [2009] *Crim LR* 389.

¹⁶⁸ *Ibid.*, at p 404; Serious Crime Act 1997, s.47(5).

¹⁶⁹ *Ibid.*

suspicion and knowledge.¹⁷⁰ Thus, despite their reflection of the effects of perpetrators' involvement in GLG, the intricacies of these offences may well inhibit their use. The afore-discussed s.14 offence offers greater potential than these offences and that of conspiracy because the required *mens rea* only relates to the offence intentionally arranged or facilitated.¹⁷¹

Whilst we have analysed which offences can apply to GLG itself, considering how the police might be able to act before C/ASAE occurs, it has proven most straightforward to catch the C/ASAE that GLG leads to in the recent cases. The majority of the charges and convictions related to a multitude of other offences under the SOA which, by and large, occurred consequent to the grooming such as rape (s.1), sexual assault (s.3), sexual activity with a child (s.9), causing or inciting child prostitution or pornography (s.48), and trafficking for the purposes of child exploitation (s.58). And if one of these such offences has been committed by one or more principals, the behaviour of accomplices has been caught by the law of complicity, with charges of aiding and abetting offences¹⁷² being utilised in both the Derby and Rochdale cases.

Thus, on the whole, the available offences are most clearly and easily applicable to the behaviour that GLG *leads to* rather than GLG itself. This is inevitable because of the difficulties of criminalising the heterogeneous phenomenon of grooming. Moreover, the police only tend to be alerted to criminal behaviour after C/ASAE has occurred. As Samantha Craven et al have observed, 'retrospective identification of sexual grooming, i.e. after a sexual offence has been committed, is much easier than prospective identification, i.e. before a sexual offence.'¹⁷³ Offences that are capable of catching GLG perpetrators prior to the occurrence of C/ASAE (such as the inchoate offences discussed and those under ss.14 and 15), can only be utilised effectively if victims come forward earlier, or proactive policing secures the necessary evidence of intent as discussed above. But, as we have shown, the effectiveness of the grooming process and common constructions of non-ideal victims have hampered the use of a more preventative approach that could catch perpetrators before they cause more grievous harm to victims.

A

CONCLUSION

Melrose has recently argued that because of the variety of different forms of C/ASAE, there is a need to adopt 'fluid understandings' and, in so doing, to take into account the particular context in which the exploitation is occurring.¹⁷⁴ This is what we have sought to do in our analysis of GLG in this paper. GLG is a heterogeneous phenomenon that cannot easily be defined or tackled. Whilst it is a variant of grooming behaviour, it is carried out for different purposes than one-to-one grooming, during which victims are groomed for the perpetrator's own self-gratification. In the context of GLG, whilst the groomer's own sexual abuse of the victim may be one of his purposes, this sits alongside other abusive and exploitative aims which can include abuse by other group members and trafficking beyond the group. The involvement of multiple perpetrators also makes GLG a distinctive type of grooming behaviour. We conclude here by outlining our recommendations as to ways in which society and law can most effectively target and tackle this distinctive phenomenon and thereby offer children and adolescents better protection from GLG and consequent C/ASAE.

¹⁷⁰ Ibid. at p 405.

¹⁷¹ *R v R* [2008] EWCA Crim 619.

¹⁷² Accessories and Abettors Act 1861, s.8.

¹⁷³ Craven et al., n 5 above, at p 292.

¹⁷⁴ M Melrose, 'Twenty-First Century Party People: Young People and Sexual Exploitation in the New Millennium' (2013) 22 *Child Abuse Review* 155, at p. 165.

Considering the law first, prior to the occurrence of C/ASAE (for which numerous offences can be applicable), it would seem that the s.14 offence, conspiracy and the child abduction offence are most applicable to GLG, although none of these captures the nature of the phenomenon. However, we are not advocating the creation of a new offence. Law is a blunt instrument; it cannot be over or under inclusive and creating a specific offence to capture GLG is unrealistic and, we submit, unachievable. Because of the complexities of GLG, we suggest that utilising existing offences, whilst accepting that they will not wholly get to grips with perpetrators' behaviour, may be the best and most pragmatic way forward. In particular, we advocate the use of s.14 offence to catch GLG perpetrators prior to the occurrence of C/ASAE, whilst recognising that this would involve proactive policing to find evidence of the required intent.

Turning to the societal response to GLG and the limited understanding of GLG that currently exists, first, there is undoubtedly a real need for more research on GLG as a form of MPOAC, the dynamics of localised grooming groups, members' motivations and their cognitive distortions, such as perceptions of victims as worthless. Secondly, the effect of the grooming process and the irrelevance of any (perceived) consent within the context of coercion and manipulation must be better recognised. More needs to be done to combat damaging constructions of non-ideal adolescent victims held by professionals working in the child protection field so as not to deter victims of GLG from coming forward, although some positive steps are being taken. For instance, the DPP has established a national network of child sexual exploitation prosecutors and specific guidance on prosecuting child sexual exploitation cases is being drafted which will emphasise that 'the credibility of the complainant's account has to be seen in its proper context'.¹⁷⁵ Measures are being taken to improve the training of social workers and the police.¹⁷⁶ It is thus clear that the professional response to GLG and consequent C/ASAE should no longer be to turn a blind eye. However, thirdly, it is imperative that more is done to ensure that sexually exploited adolescents are not victims of a hidden crime and, related to this, that damaging perceptions of victims are not held more broadly in society too. Recent media coverage of GLG and other localised grooming cases, alongside the official inquiries and professional reports, have gone some way to address this and current child protection campaigns have sought to raise awareness by highlighting particular warning signs of grooming to the public and those who work in local hotels and bars, such as adolescent girls associating with older males, getting into their cars and being offered alcohol or drugs.¹⁷⁷ Increased public awareness may give rise to witness testimony to provide evidence of behaviour that could be caught by the criminal law prior to the occurrence of C/ASAE. Also, education programmes such as the specialist sexual exploitation projects run by Barnardo's for 'vulnerable young people'¹⁷⁸ should be provided more widely to a wider range of adolescents as a part of schools' PSHE curriculum.¹⁷⁹ Programmes focused on 'healthy' relationships and the dangers of risky online behaviour already exist.¹⁸⁰ However, they need to include education on the particular dangers of GLG, alerting adolescents to the way in which localised groomers target specific vulnerabilities and

¹⁷⁵ DPP, n 126 above. Also: 'The criminal justice response to child sexual abuse: time for a national consensus', 6 March 2013, at

< <http://www.parentsagainstinjustice.org.uk/2013/03/the-criminal-justice-response-to-child.html>>.

¹⁷⁶ Department of Education, *Tackling Child Sexual Exploitation Action Plan: Progress Report – July 2012* (2012) at p 7, at: < <https://www.education.gov.uk/publications/standard/publicationDetail/Page1/DFE-00072-2012>>; 'Letter to Sue Berelowitz (January 2013)', at

<<http://media.education.gov.uk/assets/files/pdf/letter%20to%20sue%20berelowitz%20re%20interim%20report%20cse%20in%20gangs%20and%20groups%20inquiry.pdf>>; Department of Health, *Step by Step Guide* (2012), at <<http://media.education.gov.uk/assets/files/pdf/s/step%20by%20step%20guide.pdf>>.

¹⁷⁷ See, for example, 'Bid to reduce child sexual exploitation in Preston' BBC News, 25 November 2011, at <<http://www.bbc.co.uk/news/uk-england-lancashire-15887648>>; 'Campaign aims to reduce child sexual exploitation in Preston', BBC News, 11 April 2012, at <<http://www.bbc.co.uk/news/uk-england-lancashire-17667354>>.

¹⁷⁸ Barnardo's, n 10 above, at p 15.

¹⁷⁹ See the similar argument in McAlinden, n 11 above, at p 260; Beckett, n 42 above, at pp 82-83.

¹⁸⁰ Department for Children, Schools and Families, n 115 above, at p 38.

more generic vulnerabilities, their targeting of groups of adolescents in public places which they perceive to be 'safe'¹⁸¹ and their effective tactic of deceiving victims into thinking they are in a relationship with an older boyfriend.¹⁸² And the government should seriously consider calls for sex and relationships education to be made compulsory.¹⁸³

In short, GLG 'victims cannot be held to idealistic and superhuman standards of behaviour. Their frequent co-operation in their victimisation must be viewed as an understandable human characteristic that should have little or no... significance.'¹⁸⁴ In light of previous and more widespread failings in the context of C/ASAE, it is all the more imperative to ensure that society and law understand the nature of and tackle GLG effectively, and in a way that recognises that *victims* of GLG are exactly that.

¹⁸¹ Barnardo's, n 10 above, at p 6. Location specific GLG awareness sessions have been run in Rochdale, for example. See Home Affairs Committee 12 June 2012, n 90 above, Q 14.

¹⁸² In July 2012, the Department of Health stated that 'Sex and Relationships Education... is being considered within the wider context of the current Personal, Social, Health and Economic Education Review'. Department of Education, *Progress Report*, n 176 above, at p 6.

¹⁸³ 'Michael Gove must do more to protect vulnerable girls, say women's groups', *The Guardian*, 9 February 2013.

¹⁸⁴ Lanning, n 12 above, at p 50.