

Child Criminal Exploitation and County Lines drug distribution: Understanding the impact of Covid-19



# Research team

**Dr Ben Brewster**, Nottingham Research Fellow in Modern Slavery Perpetration, Rights Lab, University of Nottingham

**Dr Grace Robinson**, Research Fellow in Modern Slavery Perpetrators and Organised Crime, Rights Lab, University of Nottingham

**Professor Sir Bernard Silverman**, Professor of Modern Slavery Statistics, Rights Lab, University of Nottingham

Professor Dave Walsh, Professor in Criminal Investigation, School of Law, De Montfort University

This project – Covid-19 and Child Criminal Exploitation: Closing Urgent Knowledge and Data Gaps on the Implications of Pandemic for County Lines – was undertaken by the Rights Lab (University of Nottingham), in collaboration with the De Montfort University School of Law.

The Rights Lab is a University of Nottingham "Beacon of Excellence" and home to the world's largest and leading group of modern slavery researchers. Through its five research programmes, impact team, and INSPIRE project, the Rights Lab is underpinning antislavery with an advanced research agenda, collaborating with civil society, business, and government, and elevating survivor-informed research as a key part of knowledge production to help end slavery.

# **Funding**

This work was supported by the Economic and Social Research Council (grant number ES/V004921/1)

# **Acknowledgements**

The team would like to thank those who were interviewed for the research for their time and input.

Interim results from this study were published in a series of short stakeholder briefings published between September 2020 and June 2021. Further findings have been published in the Springer Trends in Organized Crime journal. Interim briefings can be found at nottingham.ac.uk/research/beacons-of-excellence/rights-lab. This report summarises and expands upon those findings.

# Interim research briefings

The Impact of Covid-19 on Child Criminal Exploitation, October 2020.

Policing County Lines - Impact of Covid-19, February 2021.

Covid-19, Vulnerability and the Safeguarding of Criminally Exploited Children, June 2021.

### Journal article

Brewster, B., Robinson, G., Silverman, B.W. and Walsh, D., 2021. Covid-19 and child criminal exploitation in the UK: implications of the pandemic for county lines. Trends in Organized Crime, pp.1-24. https://doi.org/10.1007/s12117-021-09442-x

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# **Executive summary**

In March 2020, restrictions on movement and social contact were imposed across the UK following the spread of the Covid-19 virus. Many legitimate businesses either closed their doors entirely or made changes to enable their employees to work from home. Media reports also began to circulate suggesting that the illicit drugs trade was also making alternative arrangements for the supply of illegal drugs.

Research conducted for this UKRI Rapid Response funded project COVID-19 and Child Criminal Exploitation: Closing Urgent Knowledge and Data Gaps on the Implications of Pandemic for County Lines sought to understand the impact of the Covid-19 pandemic on the County Lines model of illegal drug supply, and in particular on the resulting criminal exploitation of children.

In this report we highlight [1] practitioner-perceived changes and shifts in the County Lines drug supply model, [2] the impact of pandemic restrictions on law enforcement activities aimed at tackling County Lines activity, and [3] the pandemic's effect on efforts to support and safeguard children and young people criminally exploited through County Lines, or at risk of it.

Overall, our research participants indicated that they believed that the pandemic had induced shifts to County Lines that reflected the ongoing evolution of the drug supply model, in addition to responsive shifts directly resulting from pandemic restrictions on travel.

Our participants reflected that the pandemic had caused them to reconsider their understandings of the *modus operandi* of offending and behaviour linked to County Lines, as the pandemic in some cases foregrounded tactics and practices that were different from those considered to be (stereo)typical. In our study, practitioners clearly articulated the impact of Covid-19 restrictions on some young people's vulnerability to exploitation, on the way in which police and frontline practitioners respond to County Lines and CCE, and on the way in which illegal drugs were being moved and sold.

# The research methodology included

- A review of published sources (including academic publications, media articles and grey literature)
- Qualitative interviews with 46 practitioners across England. Participants included:
- practitioners working in frontline (statutory or non-governmental) service provision with young people currently or previously exploited in County Lines, or considered at-risk of exploitation;
- law enforcement officers with portfolio responsibility for policing County Lines and the illegal supply of drugs;
- practitioners from law enforcement, non-governmental or other statutory bodies working in analytical roles with responsibility for County Lines and illegal drug supply.

Interviews conducted with key frontline and analytical practitioners aimed to understand their experiences and the way they perceived the impact of the pandemic. Through our research we aimed to investigate possible and sudden shifts in perpetrator behaviours, and the development of new safeguarding and support challenges related to County Lines and Child Criminal Exploitation (CCE).

Data collection took place between July 2020 and September 2021.



# We identified several challenges

# **County Lines supply methods**

Law enforcement agencies asserted that while they believed that the overall volume of County Lines activity was consistent with pre-pandemic levels, they had perceived adaptations to the actual supply methods used by County Lines networks. For instance, significant reductions in public footfall meant that it was no longer possible to hide in plain sight on the country's rail networks, increasing County Lines' reliance on moving product by road. Police also highlighted to us that increased enforcement activity on the rail networks may have been a factor that drove this change during the initial months of lockdown.

There were also suggestions that restrictions on travel may also have increased the risk of some vulnerable adults having their properties cuckooed and taken over. Others suggested that exploited young people were being required to remain in drug market locations for longer as drugs were being moved at lower frequency, but in higher quantities. There were also indications of shifts towards the recruitment and exploitation of young people already in drug market areas, further reducing the need for frequent travel.

Other tactics were also highlighted as mechanisms to avoid detection by law enforcement, such as the use of supermarket carparks as deal locations, enabling dealers to co-locate with customer shopping routines and use keyworker disguises.

## Safeguarding capacity

Face-to-face contact between young people and various professionals was reduced, caused both by a lack of resources and social distancing restrictions (imposed to suppress infection rates), often being replaced either by doorstep or telephone communications. This had the effect of diminishing professionals' ability to easily identify signs of exploitation. School closures also created challenges, contributing to overall reductions in referrals for young people potentially at risk of exploitation, heightening concerns that many young people were confined to dangerous and exploitative situations both within and away from their homes.

#### **Exploitation risk**

Participants believed that drug supply lines persisted at pre-pandemic levels as Covid-19 did little to affect the demand for class-A substances such as heroin and crack cocaine. This ensured continued demand for young people to move and distribute drugs on behalf of those organising the drug supply. Safeguarding practitioners emphasised these concerns, and suggested young people were at increased risk of grooming through social media, as they spent longer online due to school closures and restrictions on face-to-face social activity. Concern was also expressed regarding young people's mental health, as practitioners began to receive reports of substance misuse, isolation, and self-harm.

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# Introduction

An independent review by Dame Carol Black has estimated that the UK's illicit drugs market is worth as much as £9.4 billion a year.¹ In recent years, much national attention has been centred on 'County Lines',² a term describing the development and expansion of drug supply networks from urban centres out into provincial towns. County Lines is typically framed as a process involving the transportation of illegal drugs "across police and local authority boundaries". Within County Lines, mobile phone 'lines' are used to take the orders of drugs. The National Crime Agency (NCA) reports that the importing areas where drugs are taken to be sold often report increased levels of violence and weapons-related crime.³

The County Lines model of drug supply is often linked to CCE, where young and vulnerable people are manipulated and coerced into the distribution and sale of drugs, and other criminal acts, by those controlling the supply. CCE is now often situated as a form of modern slavery and is the fastest growing form of recorded exploitation according to referrals into the UK's National Referral Mechanism (NRM, the UK's national system for identifying and supporting victims of modern slavery).<sup>4</sup> Criminal exploitation involving children aged 17 or under is now the most common form of exploitation by NRM referrals.

UK Government statutory guidance entitled 'working together to safeguard children', defines CCE as

"Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual; it can also occur through the use of technology."<sup>5</sup>

Criminally exploited young British males account for 32% of all referrals to the UK NRM in the most recently published quarterly data from the Home Office (Q3, 2021).<sup>6</sup> The pandemic seemingly had little impact on the number of referrals being made, and referrals of young British males have continued at a rate consistent with pre-pandemic levels.

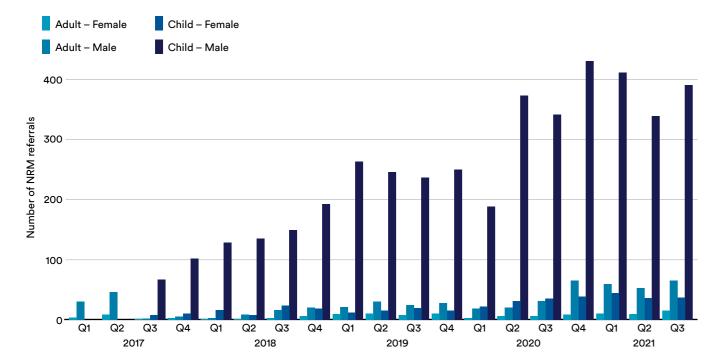


Figure 1: Number of NRM referrals flagged as county lines, by age group at exploitation and gender.<sup>7</sup>

The pandemic was seen to cause reductions to reporting related to many types of crime, however drug offences were relatively persistent in their prevalence, indicating that the pandemic had perhaps done little to disrupt neither the demand for, nor supply of, illicit substances. Overall, recorded crime fell during 2020. Reductions in recorded violent crime, including knife and firearms offences, as well as homicides, were described as a "silver lining" of the pandemic.9 In London, recorded knife crime fell by more than 50%, and stab wounds among people under 25 by 69%, leading some to suggest that the pandemic itself was acting as an inhibiter of violent crime, 10 while others argued that falls, to some extent, were attributable to proactive police work conducted on crime hotspots during the first period of national lockdown.8

Missing children reports decreased,<sup>11</sup> and were cited as possible evidence that exploitation linked to County Lines may have reduced due to the lockdown.<sup>12</sup> Others argued that, despite decreases in reports that the actual number of missing vulnerable children had in fact increased. They suggested that cuts and pandemic prompted restrictions to safeguarding and support services were having significant impacts on reporting and referrals (but not necessarily its actual occurrence), and that figures were not necessarily indicative of the true scale of missing persons.<sup>13</sup>

Recorded drugs offences for 2020 however increased in England and Wales, potentially illustrating an increase in the visibility of some types of offending and the fruits of proactive policing work targeting crime hotspots. This might also be linked to a re-orientation of policing resources towards 'visible' street crimes and the availability of additional resources, as the necessity to police the night-time economy was curtailed during periods of lockdown.

Our findings in this report focus on how various front-line professionals experienced and perceived the impact of Covid-19 on CCE and County Lines drug supply in the UK. Throughout, we use the reports and perceptions of key sectoral stakeholders from across England that were interviewed as part of our study. Through their insights we attempt to assess possible shifts in County Lines offending resulting from measures introduced in response to the pandemic, as well as their impact on efforts to detect, prevent and combat crime, and on the safeguarding of those with lived experience of exploitation. The research was undertaken with the following aims:

- To explore the impact of the Covid-19 pandemic on the criminal exploitation of young people through the County Lines model of drug supply.
- To assess the impact on organisations working in response, including police and those mandated with protecting young and vulnerable people from the risks of criminal exploitation.
- To highlight promising and effective practices adopted by sectoral stakeholders during the pandemic, and to provide proposals for future policy and practice to better address CCE and County Lines.

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<sup>&</sup>lt;sup>1</sup> Carol Black, "Review of Drugs Part Two: Prevention, Treatment, and Recovery," Department of Health and Social Care, 2021, https://www.gov.uk/government/publications/review-of-drugs-phase-two-report/review-of-drugs-part-two-prevention-treatment-and-recovery.

<sup>&</sup>lt;sup>2</sup> Simon Harding, County Lines: Exploitation and Drug Dealing Among Urban Street Gangs, County Lines (Bristol University Press, 2020), https://doi.org/10.2307/j.ctv114c782.

<sup>&</sup>lt;sup>3</sup> The National Crime Agency, "County Lines," 2019, https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines.

<sup>&</sup>lt;sup>4</sup> Home Office, "Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, Quarter 1 2021 – January to March," 2021, https://www.gov.uk.government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-quarter-1-2021-january-to-march/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-quarter-1-2021-january-to-march.

<sup>&</sup>lt;sup>5</sup> HM Government, "Working Together to Safeguard Children," 2015, https://www.gov.uk/government/publications/working-together-to-safeguard-children--2.

<sup>&</sup>lt;sup>6</sup> UK Home Office, "Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, Quarter 3 2021 – July to September," 2021, https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-quarter-3-2021-july-to-september/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-quarter-3-2021-july-to-septem.

Office for National Statistics, "Crime in England and Wales: Year Ending December 2020," 2021, https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandiustice/bulletins/crimeinenglandandwales/yearendingdecember2020.

<sup>&</sup>lt;sup>9</sup> London Metropolitan Police Commissioner Cressida Dick speaking in Vikram Dodd, "Falls in Gun and Knife Crime a 'Silver Lining' to Pandemic, Says Met Chief.,' The Guardian, 2020, https://www.theguardian.com/uk-news/2020/may/13/falls-in-gun-and-knife-a-silver-lining-to-pandemic-says-met-chief.

National Police Chiefs' Council, "Sustained Falls in Recorded Crime Reported throughout Lockdown," NPCC, 2020.

<sup>&</sup>lt;sup>12</sup> Joe Caluori, "County Lines after COVID - a New Threat?," CREST Advisory, May 19, 2020, https://www.crestadvisory.com/amp/county-lines-after-covid-a-new-threat?, twitter impressions-type

is Mark Townsend, "Number of Missing Vulnerable Children Soars as Safeguarding Is Cut during Pandemic," The Guardian, June 6, 2020, https://www.theguardian.com/society/2020/jun/06/alarming-rise-in-cases-of-missing-children-following-safeguarding-cuts.

<sup>&</sup>lt;sup>14</sup> Office for National Statistics, "Crime in England and Wales: Year Ending December 2020"; Samuel Langton, Anthony Dixon, and Graham Farrell, "Six Months in: Pandemic Crime Trends in England and Wales," Crime Science 10, no. 1 (2021), https://doi.org/10.1186/s40163-021-00142-z.

# Literature overview

County Lines as a term has been in use since at least 2015.<sup>15</sup> While it is now pervasive in public and professional discourse surrounding the UK's illegal drug market, there remains significant debate as to the origins of the underlying activity.<sup>16</sup> Some have suggested the model emerged in response to the saturation of drug availability in major towns and cities,<sup>17</sup> increased opportunities for profit, and the presence of areas where there is a captive (and underserved) market of drug users,<sup>18</sup> with less competition than might be found in the dealers' home localities.<sup>19</sup>

Mobile phones are key to the county lines model. Dealing networks use phones to establish an address book of active drug users, using it as a 'deal line' for the regular supply and distribution of illegal drugs.<sup>20</sup> The model also often relies on the establishment of a physical local base, referred to as a 'trap house'.<sup>21</sup> Originating from the street term for drug dealing ('trapping'), these locations are residential properties owned, or rented, by individuals located in drug import locations. These locations are subsequently taken over ('cuckooed') and used to package and distribute drugs.<sup>22</sup> The use of mobile phone numbers is intrinsic to County Lines' success, and it is these phone 'lines' that are used to connect new customers to the 'out of town' dealers operating in their area.<sup>23</sup>

Alongside its emergence, County Lines has become an increasing concern for child welfare agencies, as reports suggest children aged as young as seven are being exploited as 'runners' to move and sell drugs in areas far away from their homes.<sup>24</sup>

The exploitation of children in these operations offers distance and anonymity for dealers who control the supply, enabling them to manage operations from remote locations without having to remain present in market areas themselves.<sup>25</sup>

Adults are also known to be exploited as drug 'runners' and 'commuters', particularly in circumstances where existing drug users are controlled as 'user dealers'. Criminal exploitation through County Lines may also result in young people undertaking a wide range of criminal activities, including possessing and concealing knives and firearms, perpetrating violence, harbouring offenders, and providing false alibis. 27

# **County Lines in lockdown**

There remains some confusion regarding exactly what shifts in County Lines activity have been directly caused by the Covid-19 pandemic. This reflects a lack of evidence about changes to illicit drug markets in general. To some extent, this seems attributable to the short time frames being studied or reported on, many of which were from the first half of 2020, during the UK's first national lockdown. Therefore, caution must be taken not to overestimate (or guess) the extent to which the pandemic has impacted upon drug markets general, or indeed County Lines and CCE.<sup>28</sup>

Reported changes in the nature and levels of activity and exploitation that were highlighted through the media and other reports during the early stages of the pandemic indicated that young people were still being found on the country's rail network away from home and carrying significant sums of money and/or drugs, regardless of government restrictions.<sup>29</sup>

Issues related to the use of rail networks (or otherwise) by County Lines networks were a central part of the early reporting and speculation. For instance, despite reporting a 94% reduction in rail travel generally, British Transport Police (BTP) claimed they had "not seen a reduction" of County Lines activity involving young people.<sup>30</sup> While fewer young people might be using the rail networks to move drugs, those that remain were increasingly visible to police, meaning that this could not necessarily be held as a measure of change in the prevalence of rail use by illicit drug operations. BTP acknowledged that the reduction in train services and the requirement to have an essential purpose for journeys made it "incredibly easy" for them to detect and disrupt activity.<sup>31</sup>

The increased visibility, and possible disruption, of children and young people moving drugs on public transport may also have encouraged distribution networks to change their tactics. Superintendent Andy O'Connor of Merseyside police commented in the media that drug distribution networks were actively avoiding public transport and using cars instead.<sup>32</sup> This was apparently corroborated from media interviews with middle-tier drug dealers,<sup>33</sup> and further supported in an opinion piece by a now retired senior police officer who speculated on likely shifts during the first wave of the Covid-19 virus in mid 2020.<sup>34</sup>

Moreover, Harding detailed how drug-market sources had advised him that the supply of drugs from metropolitan centres to provincial or seaside towns now more commonly involved "medium bulk deliveries in cars rather than young people travelling by train and bus, where they would be more likely to be spotted by authorities". These suggestions indicate that 'runners' might be travelling less often, but with larger quantities of drugs and money, and remaining in rural or coastal distribution areas for longer. There was also speculation that drug distribution networks and some individual drug users had anticipated disruptions to supply and had begun to stockpile drugs in importing locations prior to the introduction of restrictions on social interaction and travel. The supply and had begun to stockpile drugs in importing locations prior to the introduction of restrictions on social interaction and travel.

Reductions in the number of journeys being taken and longer stays in drug import locations has potential implications on the numbers of children reported missing. However, a reduction in missing children reports may disguise the possibility that those who were missing could have been forced to stay in county bases for longer periods of time, <sup>38</sup> potentially serving as an indicator of continued or enhanced cuckooing risk. Reporting also suggested that some young (exploited) drug runners had become frustrated at making fewer journeys, as it provided less opportunities to make money, while those with prolonged stays of confinement in provincial bases were bored and irritated.<sup>39</sup>

<sup>&</sup>lt;sup>15</sup> National Crime Agency, "NCA Intelligence Assessment. County Lines, Gangs and Safeguarding," 2015, https://www.nationalcrimeagency.gov.uk/who-we-are/publications/359-nca-intelligence-assessment-county-lines-gangs-and-safeguarding-2015/file.

<sup>&</sup>lt;sup>16</sup> Jack Spicer, Leah Moyle, and Ross Coomber, "The Variable and Evolving Nature of 'Cuckooing' as a Form of Criminal Exploitation in Street Level Drug Markets," Trends in Organized Crime 23, no. 4 (2020): 301–23, https://doi.org/10.1007/s12117-019-09368-5; A Turner, L Belcher, and I Pona, "Counting Lives: Responding to Children Who Are Criminally Exploited," Childrens Society, 2019, https://www.childrenssociety.org.uk/sites/default/files/counting-lives-report.pdf.

TR McLean, G Robinson, and J A Densley, County Lines: Criminal Networks and Evolving Drug Markets in Britain, 1st ed. (Springer, 2019), https://doi.org/10.1007/978-3-030-33362-1; James Windle and Daniel Briggs, "ilt's like Working Away for Two Weeks': The Harms Associated with Young Drug Dealers Commuting from a Saturated London Drug Market," Crime Prevention and Community Safety 17, no. 2 (2015): 105–19, https://doi.org/10.1057/cpcs.2015.2.

<sup>&</sup>lt;sup>18</sup> Windle and Briggs, "'It's like Working Away for Two Weeks': The Harms Associated with Young Drug Dealers Commuting from a Saturated London Drug Market."

<sup>19</sup> National Crime Agency, "NCA Intelligence Assessment. County Lines, Gangs and Safeguarding"; National Crime Agency, "County Lines Gang Violence, Exploitation & Drug Supply," 2016, https://www.nationalcrimeagency.gov.uk/who-we-are/publications/15-county-lines-gang-violence-exploitation-and-drug-sup-

<sup>&</sup>lt;sup>20</sup> Harding, County Lines: Exploitation and Drug Dealing Among Urban Street Gangs.

<sup>&</sup>lt;sup>21</sup> Turner, Belcher, and Pona, "Counting Lives: Responding to Children Who Are Criminally Exploited."

<sup>&</sup>lt;sup>22</sup> Ross Coomber and Leah Moyle, "The Changing Shape of Street-Level Heroin and Crack Supply in England: Commuting, Holidaying and Cuckooing Drug Dealers Across 'County Lines,'" British Journal of Criminology 58, no. 6 (2018): 1323–42, https://doi.org/10.1093/bjc/azx068; Nigel Stone, "Child Criminal Exploitation: 'County Lines', Trafficking and Cuckooing," Youth Justice 18, no. 3 (2018): 285–93, https://doi.org/10.1177/1473225418810833.

<sup>&</sup>lt;sup>23</sup> Coomber and Moyle, "The Changing Shape of Street-Level Heroin and Crack Supply in England: Commuting, Holidaying and Cuckooing Drug Dealers Across 'County Lines."

<sup>&</sup>lt;sup>24</sup> Turnér, Belcher, and Pona, "Counting Lives: Responding to Children Who Are Criminally Exploited"; Lauren Wroe, "Contextual Safeguarding and 'County Lines," Contextual Safeguarding Network, 2019.

<sup>&</sup>lt;sup>25</sup> National Crime Agency, "NCA Intelligence Assessment. County Lines, Gangs and Safeguarding."

<sup>&</sup>lt;sup>26</sup> Harding, County Lines: Exploitation and Drug Dealing Among Urban Street Gangs.

<sup>&</sup>lt;sup>27</sup> The Childrens Society, "Tackling Criminal Exploitation," Childrens Society, 2019, https://www.childrenssociety.org.uk/what-we-do/our-work/tackling-criminal-exploitation-and-county-lines.

<sup>&</sup>lt;sup>28</sup> Luca Giommoni, "Why We Should All Be More Careful in Drawing Conclusions about How COVID-19 Is Changing Drug Markets," International Journal of Drug Policy 83 (2020), https://doi.org/10.1016/j.drugpo.2020.102834.

<sup>&</sup>lt;sup>29</sup> Jamie Grierson and Amy Walker, "Gangs Still Forcing Children into 'County Lines' Drug Trafficking," The Guardian, April 13, 2020, https://www.theguardian.com/uk-news/2020/apr/13/gangs-still-forcing-children-into-county-lines-drug-trafficking-police-covid-19-lockdown.

<sup>&</sup>lt;sup>30</sup> Jamie Grierson and Amy Walker, "Gangs Still Forcing Children into 'county Lines' Drug Trafficking," The Guardian, 2020, https://www.theguardian.com/uknews/2020/apr/13/gangs-still-forcing-children-into-county-lines-drug-trafficking-police-covid-19-lockdown?CMP=Share\_iOSApp\_Other.

<sup>&</sup>lt;sup>32</sup> Helen Pidd, "County Lines Gangs Disguised Drug Couriers as Key Workers during Coronavirus Lockdown," The Guardian, July 5, 2020, https://www.theguardian.com/uk-news/2020/jul/05/county-lines-gangs-drug-couriers-key-workers-coronavirus-lockdown-cocaine-heroin.

<sup>&</sup>lt;sup>53</sup> R Tidy, "The Ups and Downs of Dealing Drugs during Lockdown," Vice, 2020, https://www.vice.com/en/article/jgxvqb/the-ups-and-downs-of-dealing-drugs-throughout-lockdown.

<sup>24</sup> Tony Saggers, "How COVID-19 Is Affecting County Lines," RUSI, April 3, 2020, https://shoc.rusi.org/informer/part-2-how-covid-19-affecting-county-lines.

only deggets, Thow Gangs Adapted to Coronavirus - and Why We May See a Surge in Violence as Lockdown Lifts, The Conversation, June 22, 2020, https://

<sup>36</sup> Caluori, "County Lines after COVID - a New Threat?"

<sup>&</sup>lt;sup>37</sup> Saggers, "How COVID-19 Is Affecting County Lines"; Tidy, "The Ups and Downs of Dealing Drugs during Lockdown"; Ian Hamilton, "What Will Covid-19 Mean for the Illegal Drug Market and People Dependent upon It?," the bmj opinion, 2020, https://blogs.bmj.com/bmj/2020/03/31/ian-hamilton-covid-19-mean-illegal-drug-market-people-dependent/

<sup>38</sup> Tidy, "The Ups and Downs of Dealing Drugs during Lockdown."

<sup>39</sup> Tidy

Lockdown restrictions affected the availability of other types of property for use as dealing bases, such as Airbnb accommodation and hotels, causing suspicion of further cuckooing risk.<sup>40</sup> However, there were also additional challenges associated with the use of cuckooed properties, as increased public footfall at residential properties may have raised suspicion, at a time when people were not permitted to visit other households.<sup>41</sup> Others reported that drug sales were increasing in places, such as car parks, industrial warehouses and unused railway land,<sup>42</sup> as was the technique of 'stacking', which involves assembling groups of customers together at the same time and place.<sup>43</sup>

There have also been reported shifts towards local recruitment and exploitation of young people in import locations, rather than relying on young people moving substances in small quantities from urban areas who were now vulnerable to detection, marking the emergence of a new "local franchised model of County Lines".<sup>44</sup> Also reported widely was the use of key worker disguises by runners,<sup>45</sup> and daily exercise as cover for movement from one place to another.<sup>46</sup> Interestingly, there were also reports of adherence to Covid-19 guidance, such as the maintenance of social distancing, wearing masks and gloves,<sup>47</sup> and even refusing to accept cash during drug transactions.<sup>48</sup>

# Vulnerability to exploitation

Disruptions to youth services during the initial lockdown of March 2020 fuelled concerns that children would continue to be targeted by County Lines networks. Schools and colleges also closed. Others highlighted that increased the isolation of many young people, and significantly reduced the amount of exposure some had to professionals who would have been ordinarily well-placed to identify possible risks and issues.<sup>49</sup> Commentators suggested that these factors had the potential to result in a "heightening of risks for those already exploited", "increasing risks of exploitation", and the "disruption of response efforts".50 Restrictions removed opportunities for professionals to identify risks, gather information, and provide space for disclosures, exacerbating regional variations in the availability services that already leaves many young people at risk and without access to professional help and support.51

The number of those reported missing from either home or care establishments was also reckoned to decrease during the early stages of lockdown in 2020.<sup>52</sup> A study conducted by the University of Liverpool reported a 35% decrease the number of missing children reports.<sup>53</sup> Regardless as to whether this may have been expected, concerns remain around the increasing vulnerabilities of those who do go missing, especially children under the care of local authorities who make-up a large proportion of missing cases.

Reporting by the National Youth Agency suggested that lockdown was used as a cover for a 'recruitment drive' by criminal networks.<sup>54</sup> The amount of time being spent online was recognised as a potential risk factor for the grooming of children and young people,<sup>55</sup> especially those previously unknown to child protection services or law enforcement. More time at home also meant that some were at increased risk of exposure to domestic violence,<sup>56</sup> an issue which has previously been attributed as a push factor towards County Lines activity.<sup>57</sup>

The tactics employed by County Lines networks may have impacted upon the vulnerability of children and young people in a number of ways. National reporting often emphasises the impact of exploitation on boys and men. The experiences of girls and women are lesser acknowledged, and not well understood. Some reporting suggests that females are increasingly being exploited by County Lines networks as a way to avoid suspicion from law enforcement. Indeed, the National Crime Agency noted an increase in the number of suspected female victims of sexual exploitation under the age of 18, which may be attributable to the increased prominence of county lines.

Reporting by the media, academics and current and former practitioners related to County Lines and CCE since the start of pandemic strongly suggest that Covid-19 has had some impact on the methods employed to maintain the illicit supply of drugs in the UK, the exploitation of young people, and the work of practitioners in response. However, for the most part, in many cases it could not be concluded whether reported changes are speculative, based on specific and anecdotal examples, regionally variant, or reflective of wider (non-pandemic specific) trends or shifts in County Lines behaviour.

In many cases it is difficult to establish whether some reports, which appeared to corroborate one another, were drawing on the same speculative or anecdotal evidence. Further, reporting has mainly focussed on possible changes and adaptations associated with Covid-19 restrictions, and the sense that the pandemic was (and remains) a unique event. Thus, the literature is potentially skewed away from what County lines activity continued, seemingly unaffected by the lockdown.



<sup>&</sup>lt;sup>40</sup> Tony Saggers, "Part 2: How COVID-19 Is Affecting County Lines," RUSI, 2020.

<sup>41</sup> Harding, "How Gangs Adapted to Coronavirus – and Why We May See a Surge in Violence as Lockdown Lifts."

<sup>42</sup> National Youth Agency, "Gangs and Exploitation: A Youth Work Response to COVID-19," 2020, https://nya.org.uk/wp-content/uploads/2020/06/NYA-Hidden-in-Plain-Sight-1.pdf.

<sup>43</sup> Caluori, "County Lines after COVID - a New Threat?"

<sup>44</sup> Caluori

<sup>&</sup>lt;sup>45</sup> Harding, "How Gangs Adapted to Coronavirus – and Why We May See a Surge in Violence as Lockdown Lifts"; Pidd, "County Lines Gangs Disguised Drug Couriers as Key Workers during Coronavirus Lockdown."

<sup>46</sup> Saggers, "Part 2: How COVID-19 Is Affecting County Lines."

<sup>47</sup> Yohannes Lowe, "Gang Members Wear Masks to Sell Drugs on Street," The Telegraph, March 21, 2020, https://www.telegraph.co.uk/news/2020/03/21/

<sup>&</sup>lt;sup>48</sup> Niamh Eastwood, Jack Spicer, and Judith Aldridge, "I Was Quite Surprised' - How Are Drug Dealers Adapting to Lockdown?," Vice, May 11, 2020, https://www.vice.com/en\_au/article/k7qek9/release-uk-drug-market-survey.; Harding, "How Gangs Adapted to Coronavirus – and Why We May See a Surge in Violence as Lockdown Lifts."

<sup>&</sup>lt;sup>49</sup> Amy Coles, "Coronavirus: Children Could Be Targeted by County Lines Gangs as Schools Shut down, Teachers Fear," The Independent, 2020, https://www.independent.co.uk/news/uk/crime/coronavirus-schools-shut-children-county-lines-drug-gangs-a9415691.html; National Youth Agency, "Gangs and Exploitation: A Youth Work Response to COVID-19."

<sup>50</sup> Angharad Smith and James Cockayne, "The Impact of COVID-19 on Modern Slavery," Delta 8.7, 2020, https://delta87.org/2020/03/impact-covid-19-modern-slavery/.

<sup>&</sup>lt;sup>51</sup> Elaine Wedlock and Julian Melina, "Sowing the Seeds: Children's Experience of Domestic Abuse and Criminality," Victims Commissioner, 2020, 82, https://victimscommissioner.org.uk/.

<sup>52</sup> Caluori, "County Lines after COVID - a New Threat?"

ss Karen Shalev Green et al., "The Impact of COVID-19 Lockdown Restrictions on Missing Person Reports," 2020, https://researchportal.port.ac.uk/portal/en/publications/the-impact-of-covid19-lockdown-restrictions-on-missing-person-reports(8f6fda76-697f-4b09-b0b7-d4688de6de61).html.

<sup>54</sup> National Youth Agency, "Gangs and Exploitation: A Youth Work Response to COVID-19," 7.

<sup>55</sup> Harding, "How Gangs Adapted to Coronavirus – and Why We May See a Surge in Violence as Lockdown Lifts"; Saggers, "How COVID-19 Is Affecting County Lines"; Saggers, "Part 2: How COVID-19 Is Affecting County Lines."

<sup>56</sup> National Police Chiefs' Council, "Domestic Abuse Victims Urged to Keep Seeking Help during National Lockdown," NPCC, November 18, 2020, https://news.npcc.police.uk/releases/domestic-abuse-victims-urged-to-keep-seeking-help-during-national-lockdown.

<sup>&</sup>lt;sup>57</sup> Wedlock and Melina, "Sowing the Seeds: Children's Experience of Domestic Abuse and Criminality."

<sup>58</sup> National Youth Agency, "Gangs and Exploitation: A Youth Work Response to COVID-19"; Wedlock and Melina, "Sowing the Seeds: Children's Experience of Domestic Abuse and Criminality."

<sup>&</sup>lt;sup>59</sup> National Youth Agency, "Gangs and Exploitation: A Youth Work Response to COVID-19"; Saggers, "How COVID-19 Is Affecting County Lines."

<sup>60</sup> National Crime Agency, "County Lines Violence, Exploitation & Drug Supply 2017," 2017, https://www.nationalcrimeagency.gov.uk/who-we-are/publications/234-county-lines-violen-ce-exploitation-drug-supply-2017/file.

<sup>&</sup>lt;sup>61</sup> James Windle, Leah Moyle, and Ross Coomber, "'Vulnerable' Kids Going Country: Children and Young People's Involvement in County Lines Drug Dealing," Youtl Justice 20, no. 1–2 (2020): 5, https://doi.org/10.1177/1473225420902840.

# Methodology

The project included both desk-based research and primary data collection conducted between May 2020 and September 2021. We took a descriptive approach, 62 aiming to understand whether there were any adaptations to County Lines and CCE occurring during the pandemic – according to the experiences and perceptions of practitioners working in both frontline and intelligence analysis roles in key stakeholder organisations.

Primary data from practitioners was supplemented by a literature review which sought to serve as a baseline for models of county lines drug supply and CCE prepandemic against which perceived adaptations could be assessed. Additionally, press coverage and other reporting on the state of CCE and County Lines throughout the pandemic was also reviewed.

We conducted 46 interviews with key frontline and analytical practitioners. Our questions sought to understand their experiences working during the pandemic, their professional perceptions regarding the impact of Covid-19 - including possible shifts in the behaviour or perpetrators, and the emergence of new safeguarding challenges. We selected participants based on membership to one or more the following categories: a) practitioners involved in frontline (statutory or nongovernmental) service provision with young people currently or previously involved in County Lines, or at risk of becoming involved; b) law enforcement officers with portfolio responsibility for policing County Lines and illegal drug supply; and c) practitioners from law enforcement, non-governmental or other statutory bodies working in analytical roles with responsibility for County Lines and illegal drug supply.

We interviewed 21 police personnel, including 10 from territorial police forces in England, five from Regional Organised Crime Units, four from the BTP, and two from the National Police Chiefs Council. We also interviewed 10 local authority employees, 13 youth workers from non-governmental organisations and two private sector employees, including one from the car rental industry. Participants were initially sampled purposively according to previously identified criteria, and further participants were later identified via a snowball referral approach.

Interviews were semi-structured, with flexibility to allow the researchers to explore insights on issues where participants had specific first-hand experience or knowledge. We made slight adjustments to the phrasing of questions, depending on participants' professional roles. Interviews were transcribed and thematically coded.63 During the analysis identified codes were generated and arranged into potential themes.

# Limitations

Our data was collected during the first eighteen months of the Covid-19 pandemic in the UK. The proximity of our research to the pandemic meant that peer-reviewed academic literature upon which to base significant proportions of our findings was not substantially available, increasing our reliance on other sources, such as journalistic accounts and expert opinions. We also took into account that circulating media reports had the potential to influence participants' views on what changes, adaptations and challenges were perceived as taking place. In response, we were diligent in our efforts to ensure that questions to participants were framed so that they would relay information relevant to their own professional experiences. In the case of those in analytical rather than frontline positions, we were careful to ask whether insights were based on recorded incidence in their professional jurisdiction, rather than anecdotal ones. In geographic areas where individuals from multiple organisations were interviewed, we also attempted to corroborate shifts, perceptions, and assumptions across interviewees. In the presentation of results later in this report, reasonable effort has been made to ensure that the language used around particular reports and perceptions is indicative of our confidence levels in the information reported to us by participants.

The positioning of our study also had the potential to introduce a degree of bias. Within our recruitment materials, the issue of County Lines drug supply was presented as an issue of exploitation and linked to the current policy window and discourse surrounding CCE and County Lines as a form of modern slavery. This framing meant that prospective participants (for example, the police) who did not share this framing might have been less inclined to participate or share conflicting views (ie that young people participate in County Lines as a matter of choice).



<sup>62</sup> David Silverman, Interpreting Qualitative Data (London: SAGE, 2015), 113.

<sup>63</sup> John W. Creswell and J David Creswell, Research Design: Qualitative, Quantitative, and Mixed Methods Approaches, 2014; V. Braun and V. Clarke, "Using Thematic Analysis in Psychology," Qualitative Research in Psychology 3, no. 2 (2006): 6.



# **Findings**

We found general agreement that County Lines drug distribution adapted in response to restrictions imposed by the UK government to reduce the spread of the Covid-19 virus. However, there was less consensus concerning how, and to what extent to which these changes occurred.

Restrictions likely also had broader implications on efforts to detect crime and exploitation – and those at risk. Working patterns changed, as did the services frontline practitioners such as police and child protection professionals were able to provide. Schools closed, and opportunities for face-to-face safeguarding and risk assessment interventions greatly reduced. Young people were confined to their homes, fuelling further concerns around online harms.

The following sections unpick what we found from the interviews conducted with stakeholders from around England, revealing their experiences of working in fields that intersect with County Lines and CCE, and their perceptions of how offending, exploitation and risk shifted over the course of the pandemic.



# **Impact on County Lines activity**

# **Key findings:**

- Drug supply lines adapted their methods to evade detection from law enforcement during periods of lockdown restrictions.
- Police participants in our study reported that County Lines exhibited a preference for the use of roads and private hire vehicles in response to reductions in public transport footfall.
- Increases in day-tripping and the use of novel and geography specific mechanisms to move drugs.
- Suggestions that the risk of cuckooing had increased as supply lines sought to establish local supply bases. But better identification of cuckooed properties while more people were at home.

#### The movement of drugs

Closures to the night-time economy and huge reductions in the amount of passenger traffic through the country's rail networks appeared to bolster enforcement efforts aiming to disrupt lowlevel County Lines activity during the initial months of lockdown. Despite a 94% reduction in rail travel due to restrictions, one police officer reported in the Guardian that they had not seen a similar reduction in drug-runners using the rail networks during the early stages of lockdown.<sup>64</sup> Interviewees from the BTP reported to us that lockdown had provided grounds and capacity to question passengers on their reasons for travel, simultaneously increasing the visibility of unaccompanied young people on the rail network. They also reported learning quickly to recognise fraudulent travel justifications being used by young people, such as the claimed need to visit foodbanks or to travel for the funerals of recently deceased relatives.

The increased possibility of detecting children and young people moving drugs on public transport almost certainly encouraged distribution networks to change their tactics towards the use of cars. <sup>65</sup> This was verified by our respondents, with some police witnessing a spike in the use of the road network to transport young people and drugs. It was even suggested that those operating more sophisticated lines were synchronising their journeys with police shift handovers, particularly through the night.

Other academics suggested that drug supply operators were indicating a preference for larger bulk deliveries of drugs to provincial and seaside towns, rather than following the 'traditional' County Lines model of sending young people on public transportation - as busses and trains were largely empty as a result of the pandemic.66 In the North West of England there was intelligence to suggest that some County Lines networks were reluctant to travel due to the restrictions and added risks, instead requesting drug users and commuters travel to them to collect drugs. In another part of the country, police documented inconspicuous methods of transport including the use of canal barges to traffic drugs along waterways. The use of drones was reported in another. In the South of England, it was reported that County Lines networks had reduced the time that they were spending in drug market locations, preferring instead to make more frequent daytrips.

Following the disruption efforts of BTP, one police officer we interviewed noted on the use of private hire vehicles by County Lines networks:

"We have seen the movement away from the trains, when they go off the trains, they go on the road again [and] the tactics that we can deploy significantly increase on the road. Because you have cameras, you have a car, you have a vehicle registration number and you have a driver who has a driving licence."

We also interviewed a representative of a leading car and van rental company who confirmed that hire vehicles had become a favoured mode of transport for organised crime groups over the course of the pandemic. They said:

"We (car rental company) migrated to what we call a flexi-agreement, a 28-day rolling rental, you do it all online. From an OCGs perspective, that's great, because it means they're not having to expose themselves by sending people into a branch. What we then also started to clock (see) was ID theft, ID fraud."

<sup>&</sup>lt;sup>64</sup> Grierson and Walker, "Gangs Still Forcing Children into 'county Lines' Drug Trafficking."

<sup>65</sup> Pidd, "County Lines Gangs Disguised Drug Couriers as Key Workers during Coronavirus Lockdown."

<sup>66</sup> Harding, "How Gangs Adapted to Coronavirus – and Why We May See a Surge in Violence as Lockdown Lifts."

This participant also reported an increase in individuals selling their identities online, mainly through social media platforms such as Snapchat and Facebook. Similar to the traditional County Lines model, those less likely to raise the suspicion of the authorities (i.e. 'clean skins', those without criminal records) were deemed more desirable to the network and were offered more money. Once in receipt of the relevant documentation, organised crime groups reportedly began to take out loans, credit cards and car finance agreements in the victim's name, liquidating the assets. The difficulty in identifying the perpetrators of ID fraud has become a major issue for law enforcement, while also having serious and long-term consequences for victims.

Despite police participants reporting similar shifts and trends, there was also quite strong consensus that County Lines networks varied in their tactics from region to region, and there was little evidence to suggest that reported changes were 'one-size-fits-all'.

#### Cuckooing

We received a range of reports regarding the cuckooing of properties. Some participants suggested that the challenges associated with travel meant that trap houses were increasingly important, with young people remaining in properties (and therefore missing) for longer. The use of locally recruited dealers was also highlighted, as was the suggestion that in some areas there was almost a reversing of the County Lines model where dealers from provincial areas were travelling into metropolitan areas to collect product to distribute. One respondent remarked:

"What we saw was [that] most areas evolved and recruited local kids to do the distribution. That stopped [victims] from being picked up as missing, because when a kid goes missing, alerts [are] raised and that was disrupting the business model."

Police interviewees indicated that in some cases cuckooed properties had become easier to detect due to reductions in general public footfall and suggested that in some areas 'day tripping' was becoming popular with drug supply lines rather than the establishment of local supply bases. Interviewees attributed the visibility of cuckooed property to successes associated with targeted neighbourhood policing efforts.

"Another issue that a lot of the lines had was that it was becoming too easy to identify the Cuckoo addresses from which they were dealing ... what we saw during lockdown is, whereas before we would see addresses cuckooed for maybe a week, two weeks, and dealers would set up residence, we saw a shift to a quick cycle. So, they'd set up in an address for maybe one two days, and then move because it was too obvious."

#### Local distribution and point-of-sale

The co-option of, or adherence to, Covid-19 guidance by drug distribution networks was suggested. For example, a survey conducted by Release, the national centre for expertise on drugs and drugs law, found that dealers were 'practising the two-metre rule', 'wearing gloves and masks' and 'refusing to accept cash' relying instead on digital forms of payment.<sup>67</sup> While for some the use of masks was a convenient attempt at 'disguise', drug dealers may actually be protecting themselves.68 It has also been suggested that people distributing drugs within local areas on bikes had been using 'daily exercise' as an excuse for movement. However, it is unclear whether this is founded on the experiences of police officers, other frontline practitioners or speculation. Our participants were not able to verify or dispel these claims, but it seems likely localised approaches to evading detection have included some, or all, of what was widely reported in the media, and described here.

There was also strong consensus regarding adaptation of point-of-sale tactics, with supermarket and shopping centre carparks – as places where there was still moderate footfall to disguise activity – increasingly being used. One interviewee revealed that in some cases young people were even given supermarket uniforms as a disguise.

With the country on lockdown, and many children remaining at home with parents, there were reports of more senior County Lines perpetrators becoming more involved in the operational aspect of the business, completing journeys themselves in the absence of being able to rely upon exploited children. Police also reported an increased shift towards the recruitment of local young people to mirror the demographic of the drug market area, rather than relying on those travelling from urban centres - who may present as more conspicuous to authorities.

Consistent with media reports, findings demonstrated that County Lines actors had attempted to use disguises in order to make their travel seem legitimate. <sup>69</sup> Uniforms including those typically worn by delivery service drivers, supermarket staff, healthcare professionals, and construction workers were all referenced by our participants. While the use of disguises by criminal groups is not new, increased travel risks placed more importance on the anonymity of drug dealers. In other cases, young people questioned on train platforms supplied officers with false alibis, claiming that they were traveling to food banks or the funerals of relatives that had supposedly died from Covid-19.

It was also indicated that new social norms, such as wearing masks in public spaces way, had worked to the advantage of offenders and made it more difficult for law enforcement to identify criminals, providing them with a greater level of protection and anonymity.

"Face masks... brilliant for County Lines, because you've got an absolutely justifiable reason for covering the majority of your face while you're out and about, which makes identification very difficult."

#### **Levels of County Lines activity**

It was consistently reported to us by our police interviewees that Covid-19 had done little to impact the supply of, or demand for, class A drugs, such as heroin and crack cocaine. There was no apparent reduction in the exploitation of vulnerable populations for participation in County Lines. While our earlier findings reported adaptations to the supply and distribution of drugs, our more recent interviews conducted after easements to the initial lockdown suggested little or no change (indicating that if there had been any earlier adaptations, reversions to normal ways of operating County Lines had seemingly occurred). However, one community worker described a notable shift in County Lines actors and their motives for becoming involved:

"Adults are (now) more willing to get involved in drug dealing because they're not getting enough furlough money or any furlough money, and the bills still have to be paid"

The extent to which adults are becoming further involved in County Lines is unknown. However, as that participant indicated, the economic impact of lockdown may have placed some families into poverty and insecure situations, tempting them into illicit activity.

68 Yohannes Lowe, "Gang Members Wearing 'Coronavirus Medical Masks to Disguise Themselves," The Telegraph, 2020, https://www.telegraph.co.uk/news/2020/03/21/gang-members-wearing-coronavirus-medical-masks-disguise/.

69 Lowe.

<sup>&</sup>lt;sup>67</sup> Eastwood, Spicer, and Aldridge, "I Was Quite Surprised' - How Are Drug Dealers Adapting to Lockdown?"

# Impact on policing and criminal justice

# **Key findings:**

- Legal processes were disrupted due to lockdown, causing significant and ongoing delays.
- BTP reported enforcement successes across the country's railway network.
- Closures to activities such as the nighttime economy freed up police resources in some areas, leading to recorded successes through targeted disruption activities.
- In some areas police reported more public and community engagement, leading to intelligence on cuckooed properties.
- No apparent decrease in the availability or price of drugs, however some suggestion that purity may have decreased to the increased use of adulterants.
- Adaptations to point-of-sale tactics, including the use of disguises and co-location with customers.

### Disruption to legal processes

Lockdown restrictions encroached upon every aspect of the Criminal Justice System, with effects felt particularly within the Crown Prosecution Service (CPS) and judicial system. Court closures and transitions to remote hearings created significant delays, increasing the numbers of people, especially first-time offenders, awaiting trial. Criminal caution numbers also rose, possibly associated with an increase in Covid-19-related offences, while the number of court orders decreased. Delays in court procedure created uncertainty among frontline service providers as referrals were halted, and they expressed concern to us of the exacerbating risk to, and vulnerability of, young people left in limbo as a result.

With delays in the court system and cases awaiting trial dates, practitioners in statutory settings reported concerns over rising caseloads in the future and their ability to cope under shrinking local authority budgets and staffing numbers.

#### Police resources

The suspension of public events and closures to the night-time economy freed-up policing resources and enabled targeted detection and enforcement activities aimed at drug offending. Police participants reported various successes in this area. Disruption efforts targeting the rail network in the early stages of lockdown something was something particularly emphasised by our police participants.

Despite recognising possible shifts to supply tactics, police participants remained confident in their ongoing ability to detect and enforce against County Lines activity. One officer suggested that the force had benefited from being able to reallocate resources normally dedicated to policing the night-time economy to increase neighbourhood policing efforts, while another suggested that lockdown restrictions had increased the amount of (i) intelligence coming from within communities themselves; and (ii) engagement with partner organisations.

## **Enforcement activity**

Confidence in ongoing enforcement activity was most explicit among our interviews with BTP personnel. They reported following a disruption strategy that focused on making the use of trains increasingly difficult for County Lines networks. BTP benefitted from quieter train platforms and the resulting improvement in the ability to spot suspicious activity. Though initially affected by staff self-isolating, they took advantage of young peoples' increased visibility, questioning their reasons for travel. Officers were quickly confronted with young people in possession of false documentation, incorrect/invalid tickets, and often a lack of credible justification for their journey.

However, pandemic-imposed restrictions did make some areas of policing more challenging. The ability and speed at which interviews could be conducted with suspects was delayed due to a lack of available lawyers who were working from home or unable to attend police stations while self-isolating. Moreover, other research has found that lawyers were, more often than not, briefing their clients (who were about to be interviewed as criminal suspects by the police) remotely, rather than face to face. There was mixed views by lawyers as to whether advice provided in this way was an effective way of preparing their clients for interviews. However, lawyers tended to acknowledge that they themselves found it challenging during police interviews to advise their clients, when they were not present. Significant and ongoing delays with court procedures continue to create uncertainty among frontline service providers, exacerbating the risk to, and vulnerability of, young people who are then left in limbo.



# Intelligence and referral

Police in some areas also reported to us that they were seeing increased levels of engagement with members of the public in some communities, with greater awareness of the signs of County Lines activity and a subsequent rise in the levels of intelligence received – assisted by many people being home during typical working hours. Police we spoke to commented on residents noticing irregular behaviour, such as frequent visitors to certain properties.

Concerns were expressed due to reductions in the amount of information coming from schools and other organisations concerning at-risk young people – due to closures and staffing and service disruptions. One police force indicated to us that they had seen a 30% drop in referrals during the first 6-months of lockdown in 2020. This reduction in referrals contributed to a lack of intelligence alerting them as to when children had gone missing. Despite one study reporting a 35% decrease in missing children reports,<sup>70</sup> significant concerns remained about those who did go missing, especially children previously known to, or under the care of, local authorities.<sup>71</sup>

#### **Drug markets**

Despite initial speculation that the street-level price of Class A drugs would increase due to the closure of importation routes and difficulty in accessing supply, our participants did not report a noticeable change at street level. However, it was suggested that fluctuations were being felt at wholesale, where the price of cocaine and heroin was estimated to have risen by up to £10,000 per kilo. It was reported to us that those buying drugs in bulk may be circumventing price increases by increasing their use of adulterants, impacting upon the purity of crack cocaine and heroin received by users.

It was further highlighted that the successes of Operation Venetic—the UK's arm of the international police operation behind the 'EncroChat' encrypted messenger investigations, which saw the arrests of upwards of 746 criminals during the first national lockdown—may have had an impact on the availability, and thus price, of heroin and crack cocaine. Yet, the extent to which the operation affected lower-level drug supply, and the County Lines method, is unclear.

<sup>&</sup>lt;sup>70</sup> Shalev Green et al., "The Impact of COVID-19 Lockdown Restrictions on Missing Person Reports."

<sup>&</sup>lt;sup>71</sup> National Crime Agency, "Missing Persons Data Report 2016/2017," 2019, https://www.nationalcrimeagency.gov.uk/who-we-are/publications/304-2016-17-uk-mpu-data-report-v1/file.



# **Key findings:**

- No perceived reduction in exploitation during periods of lockdown.
- Tools of engagement with young people were blunted as meetings were reduced to being conducted on doorsteps, over the phone, or online.
- Suggestion that many children were less comfortable making disclosures in remote meetings, making it more difficult to identify exploitation and other risks.
- Reductions in the effectiveness of return home interviews for missing persons, as these also increasingly took place remotely.
- Healthcare practitioners reported that restrictions on visitors in A&E wards created 'safe spaces' for disclosures in some cases.

#### Resourcing

The longstanding effects of austerity and continued cuts to statutory frontline services continue to be felt,72 and the pandemic only exacerbated concerns over the ability of services to meet the needs of young people. Overall, there were stark reflections on the effectiveness of safeguarding activities during periods of lockdown from those in roles that provide support and services for young people. Those working in statutory and NGO settings indicated to us that during remote interventions it was more difficult to maintain the quality and quantity of their engagement with young people, making it almost impossible to accurately assess vulnerability and monitor ongoing risks. Complete closures to schools were also identified as challenging due to their role in identifying young people involved in, or at risk of, crime and exploitation. There was therefore a shared concern over the potential for CCE cases to fall through the net. One participant explained:

More positively, some professionals reported eventually adapting to a greater flexibility in terms of their ability to establish and/or participate in multi-agency meetings and forums while they were being facilitated remotely, resulting in stronger partnership working and communication. However, interviews conducted later in our study emphasised that busy remote-meeting schedules were causing 'zoom fatigue' for some.

Safeguarding professionals shared fears over the pressures on mental health services and the impact on young people trying to access help as cases of deteriorating mental health continued to proliferate.

# Missing persons

Our participants reported that they saw initial reductions in cases of missing people. Adults reported missing tended to be identified as high-risk and of extreme concern due to pre-existing mental health issues, having suicidal tendencies, and histories of self-harm. However, of the children reported missing, a larger percentage (than before Covid-19) were categorised as low-risk, and it was asserted that many of these cases comprised of looked after children. Indeed, one Missing Persons Lead suggested that, within these settings, some staff were emphasising the risk of coronavirus infection to deter young people from leaving the premises.

In cases where young people came home late (or did not come home at all), it was reported to us that reduced staffing numbers (and governmental restrictions on travelling) meant that they were much more likely to call the police rather than look for the child themselves. This suggests that, in most instances, the child was more likely to be breaching Covid-19 rules than genuinely missing from home. Due to reliance on telephone contact, those working with missing children reported a reduction in the success of return home interviews. One missing persons lead remarked:

"They're still offering telephone return interviews. It's difficult to build the relationships up with young people, especially if young people aren't familiar with you."

"The decrease in face-to-face visits from social care [and] a huge proportion of children not in school [means] a lot of these children who would be in situations of exploitation are no longer interacting with professionals who would be able to identify concerns and then take the appropriate safeguarding actions."

Those working in A&E departments suggested that the hospital environment was for some, a safe space that provided opportunity for 'reachable moments' with young people that had been admitted, where they felt more comfortable disclosing the circumstances of their injuries and exploitation. This was particularly the case during periods of the most stringent Covid-19 restrictions, where visitors were not permitted on hospital wards. Youth workers reported in some circumstances that this privacy contributed to some children disclosing the circumstances of their injuries and experiences of exploitation, as well as highlighting when they were in dangerous situations. One youth worker said:

**Safe Spaces** 

"Hospitals create such a safe environment that isn't connected to the real world. Particularly in Covid times where family and friends can't come in, they are very safe, which creates that environment of actually I can talk safely."

While it would obviously be inappropriate to place blanket restrictions on allowing families and/or friends to visit patients in A&E, once pandemic restrictions are lifted, this is something that should be borne in mind when setting future policy and practice guidance.

### Methods of engagement

Local authority and NGO participants in the study expressed general dissatisfaction at the constraints the pandemic imposed on their ability to effectively safeguard young people. Doorstep and remote interaction impeded engagement making it difficult to address and risk assess sensitive issues such as drug use.

For professionals, remote telecommunication became the new way to 'meet' one-to-one with service users, and frontline workers documented the difficulty in engaging 'at-risk' young people. Engagement limitations were often compounded for those with mental health issues and learning difficulties, as they struggled to understand, and adapt to the new changes. Care practitioners that relied upon gauging body language and using alternate measures to engage young people, such as driving and walking, or getting a drink from a local café, were concerned about participation dwindling and the likeliness of maintaining telephone contact with clients. One interviewee stated:

"Particularly with this kid that I've got [the] best engagement was in the car because you're not face-to-face. He likes to be on the move because he's got ADHD. The best way to engage with him would be; I pick him up, we probably go through McDonald's drive thru, I'd get him a drink and we'd chat on the drive. To then have to switch to speaking over the phone was so difficult."

Young people who did remain in regular contact with professionals were reported to be much less comfortable in making disclosures over the phone. Doorstep meetings also significantly impacted the safeguarding abilities of frontline services. Where previously professionals could identify potential indicators of familial harm during meetings outside of the home, they had become restricted in their ability to offer the usual safe environment that would encourage disclosures from young people. Indeed, increased exposure to domestic violence at home is a risk factor that might push people towards exploitation by criminals. Not only were children more likely to be at risk of exposure to domestic violence, but the 'postcode lottery' of service provision was exacerbated during the pandemic as child protection and other services were disrupted.73

<sup>&</sup>lt;sup>72</sup> Steve Rogowski, "Neoliberalism, Austerity and Social Work with Children and Families: Challenges and Critical/Radical Possibilities," Critical and Radical Social Work 9, no. 3 (2021): 353–67, https://doi.org/10.1332/204986021×16109919707738.

<sup>73</sup> Wedlock and Melina, "Sowing the Seeds: Children's Experience of Domestic Abuse and Criminality," 82.



# Impact on children and young people

## **Key findings:**

- Exploitation risk to young people and children, and increased risk to those in drug market areas.
- Increase in social media use and risk of online harms and remote grooming.
- Healthcare participants reported increases in injuries sustained to young people linked to vehicular crime and rape.
- Adults more willing to engage in drug supply due to worsening financial situations caused by the pandemic.
- Suicide attempts linked to forced participation in sexual abuse.
- Some cases of increased substance use due to boredom and isolation.
- Alternatively, some young people used lockdown to address substance misuse issues.

#### Social media and online harms

While most children and young people remained at home, the use of social media became an even more intrinsic part of social interaction. Frontline professionals reported seeing increasing cases of online harms and abuse, with perpetrators using platforms such as Snapchat, Instagram and Tik Tok to target young people for criminal exploitation. These platforms also continued to be used as mechanisms of control and a means of normalising and exposing young people to the aspirational lifestyle of being involved in the lucrative illegal drug economy.

For many children and young people, lockdown restrictions meant being separated from family members and peers, contributing to growing levels of isolation. With few forms of entertainment and very little opportunity for social interaction, reports of substance misuse among young people were also reported as a concern.

#### Missing

During the early stages of lockdown, the matter that fewer children were being reported as missing from home or care had been cited as evidence that exploitation through County Lines had reduced.74 However, others suggested that the pandemic had instead caused exploitation to go unrecognised and unrecorded and that actual cases had remained constant. Yet other paprticipants, however, reported that the number of missing vulnerable children had actually "soared" as the effectiveness of safeguarding deteriorated due to the introduction of restrictions on movement and social contact.75 Regardless of which of these various views represent the more accurate picture, changes in recorded incidence could be interpreted in a number of ways and are not necessarily a reliable indicator of vulnerability. We also received information suggesting that although missing children reports (may have) reduced during lockdown, children that were reported as missing, were often missing for longer, which may be associated with reports we received that substances were being supplied and dealt in larger quantities, if less frequently.

One care-practitioner we interviewed during the early stages of the pandemic speculated that some parents were less comfortable in disclosing when their children went missing from home – for fear of being fined for having had their children breach Covid-19 protocols. Other participants indicated that that calls to helplines by parents had actually increased because of workfrom-home arrangements, allowing them to identify behaviour that would go unnoticed under normal circumstances.

#### **Targeting of demographics**

The acknowledgement of exploitation involving children from more affluent backgrounds by our participants reiterated the notion that positioning financial incentives as the only driver of involvement in County Lines is too simplistic. Indeed, in some cases vulnerabilities presented themselves in the form of isolation, a need for belonging and emotional neglect. It was clear that criminals seeking to criminally exploit young people will adapt their practice to appeal to vulnerabilities that exist around all young people. Gradual shifts towards the exploitation of young people that make their operations more resilient is a predictable progression. Those falling victim to the enhanced tactics of perpetrators include females and, reported in one region, university students.<sup>76</sup>

"We've seen county lines either targeting students or actually having people who work for or run County Lines, gaining places on university courses, because you can pitch up in the halls of residence and you've got a pretty captive market at the moment."

Notwithstanding that the increased exploitation of females was seemingly a national trend, the certainty with which we can attribute that to Covid-19 remains unclear. The exploitation of these individuals may well have persisted under the radar of the authorities, only being brought into the spotlight due to the lockdown restrictions. Females provide a clear opportunity for exploitation through the possession of drugs and weapons as they are less likely to be subjected to stop and search, offering perpetrators greater protection from law enforcement.

Young males still make up the majority of A&E admissions in relation to violence, however it was reported to us that injuries sustained by female victims in relation to County Lines activity were becoming more severe and sexual in nature during the pandemic. In addition, one youth worker referred to the use of 'gift girls', describing the sexual exploitation of females by County Lines actors where victims are sexually exploited and passed around the wider network as a reward.

Concerns over online grooming featured consistently among those we spoke to, particularly involving females who were being coerced into taking and sharing explicit images of themselves. While it was unclear whether this was linked to criminal exploitation, rising cases of self-harm in young females were attributed to this form of online activity. One youth worker observed the existence of 'pop-up brothels' that were operated by organised crime groups, having not seen them prior to Covid-19. The victims, he said, were usually young British girls.

### Health

The increased movement of drugs on the roads contributed to more young people being exploited through car theft; as well as an increase in the number of injuries treated in A&E as a result of road traffic accidents, police car chases and vehicles being used as weapons by perpetrators. One youth worker remarked:

"We have seen a dramatic change in young people being injured in police chases, where cars have then been stopped or detained. We would believe that is because young people are not using public transport routes." Professionals also described an increase in the incidence of violence, as well as shifts in the types of injuries and their severity. One participant reported an increase in the number of young males (aged 21 and under) attending A&E in the south of the country who had been the victim of rape by heterosexual males. One youth worker remarked:

"Fingernails pulled off, hair pulled out, even the stabbings... whereas [before Covid-19] you may have seen one or two injuries on a young person, [now] they will be repeatedly stabbed. So we're talking five, six times is kind of an average amount of stab wounds."

Participants also observed an increase in self-harm and suicide attempts among children and young people admitted into hospital. While a general increase was reported across all genders, one youth worker specifically noted seeing rising cases of young males aged 17 to 19.

"We've continued to see incredibly high levels of suicide attempts. What has increased with that is the reason for those suicide attempts being online exploitation and males and females being asked to send explicit photos."

This, it was asserted, had become more common in some County Lines, where the harbouring of indecent images was being used by the network to exert control over young people. Another participant also identified suicide attempts linked with the occurrence of sexual violence:

"One person who I met in A&E, he had been quite heavily involved in County Lines and he was in the hospital that night for trying to drink a litre of bleach. He said: 'I just wanted to get out of it because this particular day, they was gang raping someone' [...] When he refused to get involved they beat him up and now they was after him because he wouldn't get involved in that gang rape."

<sup>&</sup>lt;sup>74</sup> Caluori, "County Lines after COVID - a New Threat?"

<sup>&</sup>lt;sup>75</sup> Townsend, "Number of Missing Vulnerable Children Soars as Safeguarding Is Cut during Pandemic."

<sup>&</sup>lt;sup>76</sup> Anthony France, "County Lines Gangs 'Targeting Students at Top Universities' as Experts Issue Warning," Evening Standard, November 13, 2020, https://www.standard.co.uk/news/crime/county-lines-target-university-students-children-s-society-b68355.html.

There were differing reported effects of Covid-19 on drug use. On the one hand, substance misuse workers suggested that, for many young people, the risk of substance abuse had increased. Lockdown provided enhanced opportunity for substance use where a lack of structure and boredom provided the perfect environment for increased dependence on drugs and for them to be used as a negative coping strategy.

However, some young people trying to address their substance use were able to use lockdown restrictions to their advantage and sever ties with negative peer groups. One youth worker said:

"I had a particular young person, he was ready to make changes, and he took lockdown as an opportunity to change his routine."

As restrictions continued to ease, various practitioners advised of concerns over the ability of young people to settle back into a normal educational routine after having so much time away from the school environment.

Some youth workers expressed fears that the UK National Referral Mechanism (NRM) was being perceived by some young people and their perpetrators as a form of witness protection, leading those with positive Conclusive Grounds decisions (which 'conclusively' establishes the person as a victim of modern slavery) to be labelled as 'snitches' and 'grasses' – putting them at risk of further violence and abuse.

### **Engagement with services**

Practitioners in statutory services spoke of having quiet caseloads due to increasing court delays and a subsequent lack of court orders in place to be able to work with those who had offended. The concern was that young people were being released under investigation for long periods and were still potentially being criminally exploited and placed in dangerous situations. Indeed, many youth workers reported 'losing' children with whom they had previously built rapport to the influence of perpetrators who were able to replace the intervention, and fulfil unmet needs, with illicit activity. One Youth Offending Team (YOT) worker said:

"Enforcement in our team is at an all-time low. Young people can answer the phone from anywhere. I could have an appointment with somebody but they may not be in the area when I speak to them on the phone. If County Lines is still going ahead, then it's more hidden."

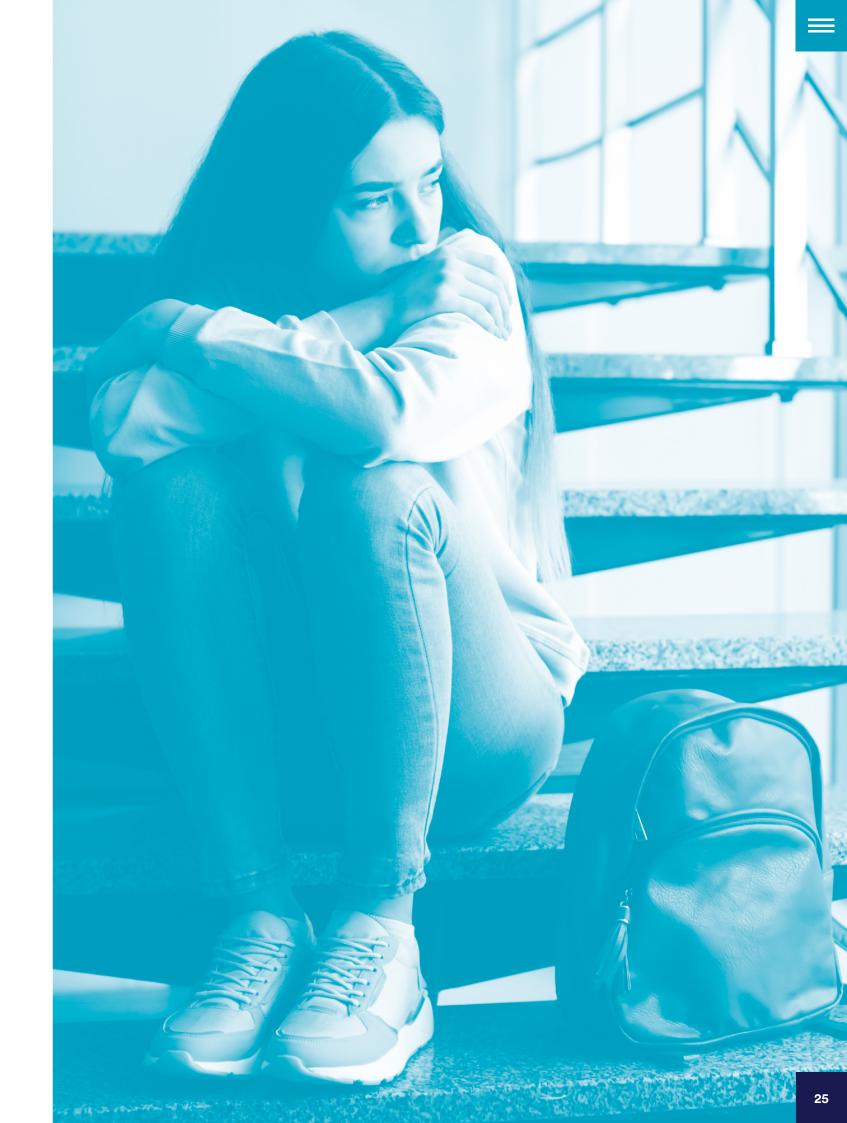
The frustrations surrounding telephone meetings were echoed across participants. These meetings were reported to be shorter and more fractured and provided young people with the ability to give excuses for having to end the meeting. Practitioners emphasised the benefits of being able to see children in person pre-Covid-19, noting the importance of interpreting nonverbal cues, observing the young person's appearance, body language and demeanour. One YOT Worker said:

"A lot of the way we work with young people is about interpreting the silence. When they happen on the phone you're more eager to fill them, rather than to observe what the young person's face is like, if they're looking down, if they look worried or concerned...If somebody comes into YOT and we suspect that they're being exploited, and they've got a new coat on, or a new pair of trainers or even a new phone. Over the phone, how do I know?"

In the case of high-risk young people, where meetings were conducted face-to-face, but outdoors in the open. It was suggested that these children were less comfortable in making disclosures and were concerned over their safety when in open spaces. Prior to Covid-19, meeting rooms, offices and cars had provided many young people with environments where they could trust that they were safe for the duration of their meeting. When meetings were held at the young person's home, children – and sometimes families – were using Covid-19 as an excuse to refuse access to youth workers.

One participant discussed the introduction of diversionary schemes that were being rolled out across the country. For example, in Merseyside, a scheme provided young people who had been involved in lowlevel offending with the opportunity to participate in their own safety planning. These young people were also offered support with drugs and alcohol, understanding the law, and harm reduction. In a similar scheme in Kent, it was reported that "83.3% of young people did not reoffend having completed the programme (in the 5 to 12 months that followed)".77 While these schemes existed prior to the onset of Covid-19, lockdown restrictions have exacerbated strains on the criminal justice system and urged the need for radical interventions that support young people while in turn alleviating these pressures.

<sup>&</sup>lt;sup>77</sup> Jen Rushworth-Claeys and Agnes Wootton, "We Need to Divert More Young People from the Criminal Justice System," Medium, 2021, https://medium.com.we-are-with-you/we-need-to-divert-more-young-people-from-the-criminal-justice-system-78909c5410c8.





# **Conclusions & recommendations**

Despite some clarifications emerging regarding short-term shifts to County Lines and CCE during the initial phases of our research, the longer-term impact of Covid-19 on County Lines and CCE is less clear. It is also difficult to assess whether some of the changes reported during our interviews were speculative or based on anecdotal examples only occurring in one place, rather than providing evidence of national or regional trends. It was also difficult to ascertain whether reports that appeared to corroborate one another were drawing on speculative or anecdotal evidence from the same places, despite our efforts to establish the sources of views that were made during interviews. What was clear however is that the impacts of Covid-19 continue to amplify and exacerbate existing issues.

Through the research, we have established sector specific recommendations to improve responses to CCE and County Lines. These are summarised below:

# **Recommendations for police**

- Community-based violence reduction approaches should be used in high-risk areas
- 2. All police forces to report accurate data to regional level County Lines analysts
- 3. Develop strong relationships with partners
- 4. Develop intelligence on middle-tier actors involved in County Lines
- 5. Increased analysis of social media activity to identify new recruitment and grooming patterns
- 6. Criminal exploitation and County Lines training to be a national requirement

# Recommendations for support services

- 1. Face-to-face contact with young people
- 2. Continue to raise awareness of exploitation among the public
- 3. Return home interviews completed in person within 48 hours
- 4. Incorporate diversionary schemes
- 5. Criminal exploitation and County Lines training to be a national requirement for those working with children and young people

The unsuitability of the NRM and its benefit to young people remains strongly questioned by practitioners. An additional lack of clarity and awareness surrounds the extent to which young people are being financially exploited, as their bank accounts are used to hold and transfer money gained from the distribution and sale of illegal drugs. The characteristics of those chosen for this type of criminal exploitation remain unclear, however the lasting implications are concerning. Young people exploited through CCE may struggle to open and maintain bank accounts following their involvement in fraud, inhibiting opportunities for future employment and accommodation.

The focus on the identification of stereotypical victim profiles remains a concern as County Lines supply networks and dealing crews adapt to groom and exploit young people. For example, we learned that there is the increasing use of girls in County Lines operation. Likewise, those young people who do not fit the stereotype of working-class young boys (who have traditionally been used by exploiters in County Lines), are less likely to be picked up by police in drug market locations. There is also anecdotal evidence that groups - including particular migrant communities with existing involvement in drug supply may also be involved in supply related CCE, and that this is not an issue that impacts solely young British males. However, we were not able to further substantiate these latter claims through our research.

The long-term impact on the County Lines model, and broader exploitation of young people in drug supply remains unclear, but it is likely that lessons learned by criminals during the pandemic will inform practices that make offending harder to detect, and increasingly resilient to disruption by law enforcement. As police develop their understanding, County Lines actors adapt and refine their tactics.

Much of the enforcement activities that were reported through our research targeted the disruption lower levels of criminality – and typically the identification of what are likely to be exploited young people. Further work is needed to focus attention on middle-tier actors involved in both the supply of illegal drugs and the recruitment of young people. Though the identification of exploited young people remains important, there needs to be a continued shift towards the recognition of their experiences of exploitation.

An additional lack of clarity surrounds the 'recruitment' of vulnerable people for County Lines. Social media platforms such as Snapchat and Instagram are increasingly being referenced as being important in the early stages of grooming. Yet, the methods of contact, and the imagery and content used to lure potential victims is less understood and so remains a significant knowledge gap. Peer recruitment appears to be important in the referrals of other young people to perpetrators, and the ease at which County Lines networks can infiltrate friendship groups is both an ongoing concern, not aided by our deficits in knowledge.

Despite successes in some areas, the pandemic continues to pose challenges for police, who must adapt to the evolving methods and tactics of County Lines. In the absence of referrals from partners (such as those statutory agencies), the safety and wellbeing of children and young people remains a key concern for police and their partner organisations. Police officers we interviewed primarily consisted of officers and analysts with previous and ongoing involvement with CCE and County Lines cases, however perceptions from them and other interviewees suggested that wider awareness of case complexity, effective safeguarding practices, and means of working with exploited young people were not widely known. Agencies must further adopt multi-agency models of working, following promising practices developed in response to Child Sexual Exploitation.

Despite some benefits of lockdown restrictions and the examples of good practice outlined in this report, Covid-19 has caused considerable harm to the capabilities of local authorities, NGOs and criminal justice services. While we have detailed some of the short-term concerns raised by practitioners as we transition out of lockdown, there are significant longterm anxieties across the sector. The effects of the pandemic may well lead to increased vulnerability, the potential of large-scale incidence of deteriorating mental health among children and young people, and a greater number of cases of online harms and substance misuse. At the same time, an increasing reliance on technology has helped enable the proliferation of exploitation. It is therefore essential that national strategies take a coordinated approach, targeting those that control the drug supply and perpetuate the cycle of exploitation within local supply networks. Alongside this, organisations must encourage professional curiosity throughout their workforce to identify and respond to the signs of exploitation. Irrespective of the long-term implications of the pandemic, and the prevalence of activity linked to County Lines and CCE. their continued prevalence further informs the need to address many of the systemic issues and inequalities that sit at the root of exploitation.

We can say with confidence that the Covid-19 restrictions had an immediate impact upon the ability of organisations to safeguard those exploited for the purposes of County Lines. The longer-term effects of the pandemic are less clear, but there is no doubt that it has left many children and young people isolated and disenfranchised. There is also a lack of clarity nationally about the illicit finance being made from County Lines. While police forces have acknowledged the exploitation of children for financial purposes, how those transactions are made, and where the profit is being placed are lesser understood.

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Published March 2022.

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