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Practitioner perspectives on dealing with victimhood and offending in UK ‘County Lines’ drug supply investigations.

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Abstract

This paper examines the investigative challenges associated with the ‘County Lines’ drug supply phenomenon from the perspective of police practitioners. Two areas are identified and explored: the presence and role of autonomy, coercion, and exploitation, and the legal and procedural issues. The police response appears confounded by non-specific legislation, unintended implications of the statutory defence, problems with the National Referral Mechanism (NRM), safeguarding deficiencies, incomplete statutory guardianship, and limited recognition of neurodevelopment and neurodivergence among those involved. The research is relevant to law and public policy and will be of interest to investigators and criminal justice system professionals.

Keywords: county lines, vulnerability, neurodiversity, neurodevelopment.

Introduction

This research article provides a practitioner perspective on an investigative situation, in which police officers encounter children and other vulnerable people as victims and perpetrators simultaneously. While it is acknowledged that there are those in positions of power in drug supply networks, who are committed offenders, exploiting others and the vagaries of the criminal justice system (CJS) to avoid accountability and evade successful prosecution (Coliandris, 2015), this study highlights the intersectionality of victimhood and offending at the lower end of ‘County Lines’ operations. It identifies that the police response can be confounded by non-specific legislation in the form of the *Modern Slavery Act 2015*; problematic implications of a statutory defence; increasing numbers and inconsistencies in

National Referral Mechanism (NRM) referrals and outcomes; safeguarding deficiencies; incomplete statutory guardianship coverage, and limited recognition of neuro-development and neurodivergence in those involved.

The article begins by setting the context of the ‘County Lines’ drug supply phenomenon, particularly for those operating in jurisdictions unfamiliar with its operating model. It then discusses the current legal and policy framework surrounding its policing and investigation in the UK, before presenting an empirical research study and discussion. Using primary data, cognate research and ‘grey’ literature, the paper argues that the official response to ‘County Lines’ has become decontextualised from the realities of the crime problem, treating children and vulnerable people as victims *or* ‘villains’ within an adversarial CJS, potentially failing them and those professionals trying to deal with it. The research questions examine: 1) what challenges officers face in investigating ‘County Lines’ related offending and case management, and 2) how issues of vulnerability, safeguarding, and referral are perceived and acted upon within the current legal and policy framework.

Contextualising the policing problem

In the UK, ‘County Lines’ is the term used to describe urban-based suppliers trafficking drugs, particularly crack cocaine, and heroin into provincial areas to deal directly to local users (Glover and Finlay, 2019). It is a ‘criminal business model’ (Spicer, 2019: 875), officially defined as the ‘transportation of illegal drugs, by gangs and organised criminal networks, from one area to another, using dedicated mobile telephone lines or other “deal lines”’ (NCA, 2018: 1). In contrast with other types of criminal activity these telephone lines are maintained and protected, with hundreds in operation each month, despite police efforts to close them down (see National County Lines Coordination Centre (NCLCC), 2021, 2023). Typically, the operating model involves male children aged between 14 and 17 years (though

some as young as 11 (Crown Prosecution Service (CPS), 2022), and vulnerable persons, often with drug addiction or mental health conditions, acting as ‘runners’ to courier cash, drugs, and weapons (NCA, 2019: 3). It is associated with prominent levels of exploitation, coercion, intimidation, violence, and weapon-enabled crime (Glover and Finlay, 2019; Moyle, 2019; NCA, 2019).

The supply of drugs (particularly crack cocaine and heroin) in the UK has evolved from open to closed markets, facilitated by mobile phones and their ease of availability (May and Hough, 2004; NCA, 2019). A closed market depicts the buyer and seller as acquainted or referred by others, to arrange transactions, rather than relying on the shared physical spaces of open markets (Moyle and Coomber, 2015). This closed type of operation offers greater security to dealers than the open market, in which the seller is visible not only to potential ‘customers,’ but also to the police, and criminal competitors who might steal their products (May and Hough, 2004). Coomber and Moyle (2018: 1326) note that the locally based ‘user-dealer’ model remains the exemplar for understanding retail-level heroin and crack markets in the United Kingdom. User-dealers are drug users who regularly or opportunistically supply others, often within their social group, to help fund personal habits. However, Coomber et al. (2019: 12) contrast this ‘harmonious’ model with that of ‘travelling dealers with more aggressive and expansionist selling strategies’, suggesting that areas where such commercially oriented dealers dominate suffer higher levels of violence.

The ‘County Lines’ operating model comprises older members who recruit younger associates, dispatching them to ‘lesser urban areas’ to supply drugs, while the deal line that users contact is usually held in the ‘home’ metropolis (Spicer, 2019: 874). Harding (2020) argues that groups have evolved from commuting into areas to setting up ‘satellite’ dealing locations and consolidation of operations, depending on market share and the police response

to their activities. The picture across England and Wales is differentiated, with police services reporting variance in the degree and visibility of ‘County Lines’ operations (NCLCC, 2021, 2023). While terminology may differ between individual networks, key roles are identified. Those at the apex of the hierarchy are the ‘boss men,’ ‘main men’ or ‘top boys’ (Coomber and Moyle, 2018: 1334). These may be ‘elders,’ that is, senior members who control the mobile telephone line, often remaining in an urban hub, far from the provincial location where dealing activity is taking place (Spicer, 2019). This provides a degree of protection from local law enforcement activity. Mid-ranking members of the network are termed ‘sitters,’ working under direction and conducting supply runs, protecting drug stock, and distributing to the ‘runners.’ ‘Sitters’ usually remain within ‘cuckooed¹’ or rented accommodation for much of their time in an area, which might range from days to several months (Coomber and Moyle, 2018; Spicer, 2021). ‘Runners’ occupy the lowest position in the hierarchy, taking drugs to the user, undertaking the ‘highest risk labour for the lowest wage’ (Coomber and Moyle, 2018: 1336), often being children or vulnerable persons susceptible to victimisation through coercion, violence, and exploitation.

The current legal and policy framework

An official response to the suspected exploitation of ‘County Lines’ ‘operatives’ has seen prosecutions of some of those responsible for offences under the *Modern Slavery Act 2015* (Independent Anti-slavery Commission (IASC), 2020). In summary, section 1 of the Act contains the offence of holding a person in slavery, servitude, forced or compulsory labour. Section 2 contains the offence of trafficking a person to exploit them. Under section 45, a statutory defence is provided for victims involved in criminal offences. For an adult accused of committing an offence, they would not be guilty if they could show that they were

¹ Cuckooing is the occupation and use of someone’s property as a ‘base’ to store and deal drugs from

compelled to commit the offence, that the compulsion was a result of exploitation or slavery, and that a reasonable person with the same characteristics, would have had no realistic alternative. For a person under eighteen, compulsion is omitted from the offence wording.

An examination of *Hansard* (the UK parliamentary debate records), indicates that the original intention of the *Modern Slavery Act 2015* (with its focus on human trafficking), was never for the hybridised type of victimhood and offending found in 'County Lines'. Consequently, making the general provisions of the legislation 'fit' with the specifics of the problem has become a matter of policy guidance only (Home Office, 2019). While an official review concluded that the modern slavery legislation remains fit for purpose (Home Office, 2019), it appears ill-fitted to the *specific* socio-legal circumstances of 'County Lines' and less likely to meet the operational and investigative needs of the police and partner agencies.

Two key developments applicable to the management of 'County Lines' have occurred. First and most recently, the establishment of the NCLCC in 2018 as a joint NPCC and NCA initiative, with the remit to co-ordinate policing activity between exporting and importing aspects of supply chains through improved information and intelligence sharing, produce strategic assessments, and assist with planning and support for police operations (NCLCC, 2021, 2023). Secondly, the earlier introduction in 2009 of the National Referral Mechanism (NRM) for identifying and supporting those suspected of being victims of modern slavery and human trafficking (Home Office, 2014, 2018, 2019). 'County Lines' has had a significant impact on the volume of NRM referrals, with the number increasing since its introduction by at least 15% and doubling in the three years 2015-2018 (Home Office, 2019). Reports of child trafficking involving 'County Lines' increased from 50 in 2017/18 to 400 in 2021, with children representing 43.5% of all NRM referrals (IASC, 2020). Potentially, the number may be higher and under-recorded due to the post-Covid-19 pandemic situation in the reporting

periods from 2019 onwards. What occurs after referral appears inconsistent, with only two-thirds of local authorities in England and Wales having Independent Child Trafficking Guardians (ICTG), obliged under section 48 of the *Modern Slavery Act 2015* to support trafficked children and those involved in their care (IASC, 2020). It is also reported that there is a ‘lack of join-up between identification, referral and intervention in respect of children’ and that ‘the issues could also apply to vulnerable adults’ (IASC, 2020: 9). The evidence indicates this is a serious and pernicious type of exploitation, yet one not deemed requiring of legislative or wider CJS reform (see Home Office, 2019).

While current responses and measures might offer partial solutions to the policing problem, they have unintended consequences that potentially leave children and vulnerable individuals inadequately protected. These shortcomings stem from a combination of factors, including a reliance on non-specific legislation like the *Modern Slavery Act 2015*, problematic use of the statutory defence, inconsistencies in NRM referrals and outcomes, safeguarding ‘gaps’, incomplete guardianship coverage, and inadequate screening and data availability for neurodevelopment and neurodivergence.

Method

The research study aimed to study specialist police officers’ experiences of dealing with victims and offenders involved in ‘County Lines’ drug supply networks, providing insight from a professionally grounded perspective. To this end the research questions address: 1) what challenges are faced in investigating ‘County Lines’ related offending and case management, and 2) how issues of vulnerability, safeguarding, and referral are perceived and acted upon within the current legal and policy framework. Ethical approval for the research project was granted by [Authors’ institution Ethics Committee reference here].

The study applied a constructivist, qualitative approach (Charmaz, 2014), comprising semi-structured, one-to-one interviews with eight police officers of various ranks and roles. These were members of a specialist team deployed to deal with 'County Lines' drug supply networks in a single, provincial police service in southern England. The participants were engaged in face-to-face semi-structured interviews lasting up to 60 minutes each, these were the primary means of data collection. In addition, to facilitate rapport-building with participants, provide context to the interviews, and heighten the researcher's theoretical sensitivity to the research problem, non-participant observation of 'in-house' training about modern slavery and human trafficking, and an extended 'Hydra'² training exercise was conducted (Bryant and Charmaz, 2007; Charmaz, 2014; Emerson, Fretz and Shaw, 2011).

The sample of participants³ (n=8) comprised two detective constables (DC), two police constables (PC), two detective sergeants (DS), and two detective chief inspectors (DCI). The sampling method was purposive (Daniel, 2012), with negotiated access to a cohort of officers selected because of their expertise and its specific relevance to the research problem. Each participant was provided with an information sheet about the research project and the interview process. Informed consent was gained in writing before each interview and

² Hydra is an immersive, interactive learning experience, using computer software to deliver scenario-based training exercises. The aim is to simulate real life incidents, requiring students to evaluate information and make decisions.

³ All identified as male.

P1 - A DCI, aged 45-54 with 30 year's service, 2 years in County Lines.

P2 - A DCI, aged 35-44 with 14 year's service, 18 months in County Lines.

P3 - A PC, aged 25-34 with 10 year's service, 2 years in County Lines.

P4 - A DS, aged 35-44 with 18 year's service, 18 months in County Lines.

P5 - A DS, aged 35-44 with 22 year's service, 2 years in County Lines.

P6 - A DC, aged 25-34 with 6 year's service, 2 years in County Lines.

P7 - A PC, aged 35-44 with 20 year's service, 2 years in County Lines.

P8 - A DC, aged 35-44 with 20 year's service, 6 years in County Lines.

confirmed at the start of each. While a small cohort, the demonstrable depth and breadth of knowledge and expertise carry considerable epistemic authority; adding to the dependability, transferability, credibility, and conformability of the research study (Eriksson and Kovalainen, 2008; Guba and Lincoln, 1989).

Each interview began with an introductory question to explore participants' professional experience of investigating 'County Lines' and their familiarity with the legal and policy frameworks. Specific questions were then posed to cover 'What are the key challenges officers face in investigating 'County Lines' offending?' and 'Can you share specific instances or scenarios that posed these challenges during your investigations?'

In relation to case management, questions were asked about what complexities were encountered in handling cases and prosecutions. For example, 'What aspects of case management did you find particularly challenging or demanding?', 'How might resource constraints impact upon the investigation and management of cases?', 'Can you elaborate on specific resource-related challenges you have faced?', 'How does collaboration with other agencies and information sharing contribute to or hinder the progress of investigations?' and 'What notable examples of successful collaboration can you share, or instances where it fell short?'

Questions then covered perceptions of vulnerability, safeguarding, and referrals. For example, 'How are issues of vulnerability perceived within the legal and policy framework available to you?', 'Can you provide examples of where vulnerability played a significant role in 'County Lines' cases?', 'How do you interpret and implement the safeguarding protocols in the context of 'County Lines' investigations?', 'Are there specific challenges or dilemmas you face when balancing the interests of vulnerable individuals and criminal justice processes involved?', 'How did you find navigating the National Referral Mechanism process

for individuals identified as being vulnerable?', and 'Can you share instances where the referral processes were particularly effective or not', 'In your experience, how does the legal and policy framework shape your approach to addressing vulnerability in 'County Lines' cases?'.

To maintain the integrity of the data and enable later transcription, interviews were audio-recorded using an encrypted device. The encryption ensured confidentiality and security of potentially sensitive information. This step was important in building trust and facilitating open dialogue during the interviews. All participants were anonymised, and data stored confidentially in accordance with the approved research protocol. Post-interview, the audio recordings were transcribed and entered into NVivo Qualitative Data Analysis (QDA) software, for systematic coding and thematic analysis.

Data analysis followed an inductive thematic process (Braun and Clarke, 2006; Charmaz, 2014; Jackson and Bazeley, 2019; Mihas, 2023). All transcriptions were read and checked by the researchers. A line-by-line coding process was undertaken, identifying and tagging segments of text. The initial codes were collated and grouped into potential themes, considering how different codes might combine to form an overarching theme. The themes were then refined, ensuring a coherent pattern based on their relevance to the research questions. The inductive nature of the analysis means that themes were developed directly from the data without 'fitting' them into a pre-determined coding frame (Charmaz, 2014). Due to the constructivist nature of the research, no claim is made regarding generalizability, but the paper provides sufficient information in its findings and discussion which may serve to highlight transferability to similar contexts (see Guba and Lincoln, 1994), and inform future discussions on legal and policy reform, and professional practice.

Findings and discussion

Two interrelated themes are identified from the data: 1) levels of autonomy, coercion, and exploitation, and 2) challenges for police investigation and case management. Where appropriate, interview excerpts have been truncated to provide focus and clarity, and to accommodate presentational requirements while being cognisant of maintaining the integrity of the original data.

Levels of autonomy, coercion, and exploitation

Participants identified several reasons for the involvement of young and vulnerable people in ‘County Lines.’ These ranged from a conscious agentic desire to being groomed, coerced, exploited or a combination. They observed those who initially joined ‘willingly’ (notwithstanding the limitations of children and vulnerable persons to make such choices by definition) and were later subjected to exploitation and those who were ‘groomed’ or coerced from the outset. The personal backgrounds of those involved displayed common features, such as marginalisation, deprivation, and absent parenting, all seen as potential drivers:

‘They are generally from underprivileged families often with no father figure, single parent families, poor families, and they are doing it for financial rewards.’ (Participant 6, DC)

‘My view has changed significantly over the years, as I have seen [the] lives of children, especially those in care, looking for some kind of love and affection and they think they are getting it from gangs. Nigh on everyone lacks a father figure of some sort. They are nearly all male, and they are nearly all troubled, if that is the right word. They have got issues, be it in care, they are regular “mispers,” and [...] easily influenced.’ (Participant 2, DCI)

As noted in other studies, materialism is a salient ‘pull’ factor for them becoming involved in ‘County Lines’ operations (Atkinson-Sheppard et al., 2023; Robinson et al., 2019; Whittaker et al., 2020). The glamour of the peer group, of drug dealing, status attainment and promise of financial gain were cited by participants as reasons for ‘willing’ involvement:

‘They are bedazzled by the apparent lifestyle, and they probably have struggled for money, have come from a background that is deprived, they see it as easy money, and they probably do make a few quid to start with until the point that they hit us.’ (Participant 2, DCI)

‘So, then you get the local juveniles who want to make a bit of money and are quite happy to do a bit of [drug] running, so we get a lot of them. [It] doesn’t take a lot for them to see it as glorified, and they want to be involved. Some [are] in care, some not, but they will happily get involved and we deal with them and try to safeguard them.’ (Participant 4, DS)

Participants cited cases of those being told they could earn £900 per week to supply drugs, but who were never ‘paid’ before they were apprehended. One described it so:

‘[He] probably was a victim to be fair, but he did it twice. He got into it to earn money, it did not go his way [he got arrested] and he owed money. So, I do have an element of empathy towards that, but he still went into it knowing it was wrong.’ (Participant 3, PC)

Through their investigations, participants encountered what they defined as ‘grooming’ activities, both in person and through the influence of social media. Examples included approaching children outside fast-food outlets and offering cash to deliver ‘packages,’

making gifts of trainers and cannabis, and sharing videos on Snapchat, TikTok and other social media platforms, of high-value cars and cash in the possession of other operatives:

‘Social media [is] massive. Snapchat, sending videos of money, which is what they do, videos of splashing money around. We nicked a guy, he had fifty grands worth of fake money, but he is on Snapchat, throwing money around, and young kids see [it] and go “Wow, I want a bit of that.”’ (Participant 3, PC)

‘I think some people like the lifestyle, they have watched the videos, and seen people with nice cars, money, they watch these drill videos and they’re saying “yeah, sell a lot of drugs, it’s great, you’ll get this and this.” Some people are brainwashed through watching [the] videos or hearing other people, their friends say, “Look I’ve got all this money, I’ve got these new trainers”.’ (Participant 7, PC)

Participants identified examples of ‘debt bondage,’ through such ‘gifts’ having been made, and later being told that they owed money or could ‘work off’ the debt. Another reason for ‘debt bondage’ was the loss of drugs or cash because of robbery or being apprehended by the police. One individual with learning difficulties was robbed of drugs by members of the same ‘County Lines’ operation (Participant 4, DS). The offender then told him to conceal them in his anus (known as ‘plugging’). The victim was led to believe that he had two packages, but later could only retrieve one. He was then told that he ‘owed’ £1,000 for the imaginary second package and became involved in a cycle where this occurred several times. Police intervention may also inadvertently create ‘debt bondage,’ for example: ‘the problem is, the minute you [the police] recover drugs from them, they are now in debt’ (Participant 4, DS).

Participants were aware of a broad spectrum of influences and motivations for involvement in ‘County Lines,’ rather than seeing a clear dichotomy of ‘ideal’ victims and ‘dangerous’ offenders. This runs counter to reported concerns about the presence and impact of a ‘vulnerability narrative’ (Dando et al., 2023: 347), wherein some professionals (not necessarily the police) tend towards a stereotype of who is considered vulnerable and more at risk of being groomed and coerced, thereby undermining awareness of the threat of ‘County Lines’ to all children (Dando et al., 2023: 349). It is also worth noting the social psychological dimensions of coercion and control since they operate on many levels, being ‘multi-faceted and related to both personal and impersonal situations [...] fast money and material gains and nuances of coercion’ (Atkinson-Sheppard et al., 2023: 2). This depicts a more complex arrangement of factors to be considered when seeking to understand individual motivations.

Many of those involved in ‘County Lines’ are representative of a cohort (Home Office, 2023) in which cognitive and emotional development sees a peak, typically at 11-15 years of age, and sometimes as late as 19 (Lenroot and Giedd, 2006; Williams, 2012). From activities reported in the present data, there is some agreement with Williams’s (2012: 10) observation that: ‘the teenage brain [...] has an adult-like ability to reason, but with a heightened need for basic reward, and a lowered capacity to buffer immediate influences and potential short-term rewards for greater, longer-term gains – especially in contexts involving peers’: setting the scene for risky decision-making. As Haines et al. (2021: 278) note, child offending, also described as ‘in the moment’, may not be ‘caused by a particular set of prior factors or characteristics, nor is it simply the result of unconstrained *deliberate* (emphasis added) acts in pursuit of self-interest’. Instead, it might better be understood through the lens of child development, seeing a child’s involvement in crime as a ‘hard-wired’ propensity for risk-taking behaviours. Moreover, we might note that behaviours which ‘violate norms, rules and

laws are not evidence that children are delinquents: they are evidence that children are children' (Haines et al., 2021: 284): such an acknowledgement dramatically changes how we frame and interpret their participation in crime. There is a nascent general move towards understanding offending in the context of neuromaturation, neurodevelopment, and neurodivergence (Criminal Justice Joint Inspectorate (CJJI), 2021; Haines et al., 2021; Hughes et al., 2012). There are two significant implications of seeing the problem of 'County Lines' through this lens. First, it challenges traditional ways of how the police and CJS might understand and respond to children's involvement and moves beyond the rational choice, adult-centric one so often applied within an adversarial system. This re-framing dramatically shifts the CJS and policing paradigm towards one based on immutable⁴ features of the developing child, focusing attention on preventing harm, developing effective interventions appropriate to the child's developmental stage, and on guidance and diversion rather than punishment.

A second implication is the necessity for reliable data about the incidence of neurodivergence and impact of neurodevelopment in the cohort of children and vulnerable persons involved in 'County Lines.' Currently, in the UK there appears no dependable, consistent, or systematic data collection by the CJS or the police (CJJI, 2021). Furthermore, concerns exist about the consistency and specificity of police custody risk assessments and screening (Dehaghani, 2020; Stoneman et al., 2019), varying focus depending on the individual expertise of the person(s) conducting them, and the utility of screening tools that do exist to properly identify such issues (McKinnon et al., 2022). Surprisingly, given the representation of so many children (reported as 20% by NCLCC (2023)) and vulnerable persons in 'County Lines' drug supply networks (Home Office, 2023), capturing the presence and significance of

⁴ In the sense that the agent does not choose stages of human development.

neuromaturation, neurodevelopmental and neurodiversity issues has yet to be embedded into police custody screening and CJS interventions, representing an anomalous area of research and professional practice.

Challenges for police investigation and case management

Participants reported on suspects' use of the section 45 defence, and issues with NRM and safeguarding referrals. They experienced difficulty in investigating lines of enquiry, either due to 'no comment' interviews neutering opportunities to probe potential defences, or late or scant defences made under section 45 of the *Modern Slavery Act 2015*:

'I had one [section 45 defence] with some corroborating evidence, but other than that there's never any evidence to support it.' (Participant 8, DC)

'There [were] no checkable facts, he said he had been bundled into a car, did not even say when [or] where, brought down to [local town] in a white Mercedes, no other details, and it was all six months later. [There's] no time, no date, just a white Mercedes, how many white Mercedes come from London to [local town]? No phone, no phone numbers, there [were] just no checkable facts.' (Participant 6, DC)

The late disclosure of section 45 defences can interfere with them being fully investigated. For example, Closed Circuit Television (CCTV) recording is rarely available after more than a month or of poor evidential quality, General Data Protection Regulation (GDPR) impedes call records access and Automatic Number Plate Recognition (ANPR) data retention. In participants' experiences, the section 45 defence was usually raised after charge, while in

theory, it could be within the police detention period where a person is interviewed and remanded in custody, in practice it could be many months later due to the time taken to obtain forensic results, mobile phone and digital data downloads and analysis, and build prosecution case files.

Measures exist for section 45 defences to be notified at the pre-trial hearing stage, to ensure that victims of trafficking are identified before a plea is taken (CPS, 2022), however, this may be late in the judicial process and places pressure on the prosecution and police, who may not have all the information available or enough time to investigate. Simpson (2019: 16) explains that where a section 45 defence is raised, the defendant bears an evidential burden of proof and must provide evidence of every element of their defence. However, it should be noted that once evidence of it is adduced, the *legal* burden of proof beyond reasonable doubt, remains with the prosecution to dismantle the defence (CPS, 2022; MK v R [2018] EWCA 667).

Because of late defences and the burden of proof issues, participants reported examples of defendants not being put before a court:

‘I have had two recent cases, both juveniles where they were charged, remanded, and the Single Competent Authority made a positive conclusive ground [that they were a victim of trafficking] and the CPS dropped the case. [There was] actually evidence to support that they were not trafficked. Text messages saying, “I am earning good money.” And the CPS, because they were juveniles would not run it.’

(Participant 6, DC)

Concern was expressed that the CPS was too willing to discontinue cases against children who raised the Section 45 defence. For example, where the defence was rebuttable or

unsubstantiated, they were disappointed that cases were not laid before a court for a jury to decide:

‘My opinion is, yes they may be a victim, but that’s for them to give their defence in court, get them into the box, let them provide that defence, and we will investigate it.’ (Participant 4, DS)

As for those suspected of engaging in trafficking children and vulnerable persons, in the absence of a victim account, sufficient evidence for *Modern Slavery Act 2015* offence charging proves difficult to obtain or have CPS act upon. The participants herein sought to obtain charge authorisations for modern slavery offences where appropriate, rather than relying on the less onerous *Misuse of Drugs Act 1971* or other statute law. This was despite CPS-published guidance that encourages the use of alternative offences in preference to the modern slavery provisions (CPS, 2022). However, in attempting to use the *Modern Slavery Act 2015*, participants found the charging threshold to be set too high:

‘CPS are very specific about what evidence they need, and if you haven’t got it, they won’t charge it, because in the absence of a victim account [...] you’ve just got a young person found in [local area] with drugs. I can show hundreds of contacts between the person running the line in London and the kid in [local area] on a daily basis, being contacted thirty or forty times a day with drug marketing message[s], users phoning the line, then the line phoning the kid to say ‘right, complete the deal, so and so’s coming round [...] without explicit text messages discussing what they’re doing, the CPS won’t charge on contact alone.’ (Participant 6, DC)

Both the Police and CPS have faced criticism over the timeliness of investigations of statutory defences and the discontinuance of cases, with Her Majesty's Inspector of Constabulary and Fire and Rescue Services (HMICFRS) (2020) highlighting that the police are not taking account of the potential for them early enough and that the CPS are too ready to discontinue once a defence is made: thereby not pursuing the opportunity to test evidence in court (IASC, 2020). There is also concern that the NRM process and section 45 defence might perversely enliven the appeal of using children and vulnerable persons in 'County Lines' operations, because of the inconsistent outcomes of referrals and CPS reluctance to proceed, indeed there is some evidence that offenders 'coach' victims to rely on the section 45 defence, if they are apprehended by police (HMICFRS, 2020).

Participants experienced frustration that individuals were referred, and subsequently arrested again in similar circumstances. They saw this as evidence of a failure of the authorities to properly protect individuals once referred by the police, or that they were not 'genuine' victims in the first place:

'They say they are not going to do anything again, and they are victims, and they are sometimes, near enough all the time I believe them because I like to believe people. But I would say at least half the time they are arrested again, so it leads me to think whatever we are doing now, does not work.' (Participant 8, DC)

Notably, because of absent or poor consultation between agencies, some NRM referrals are made without all the pertinent facts available; this is a 'regular occurrence' in 'County Lines' cases often involving Children's Social Care services (IASC, 2020: 38). Concerningly, the Independent Anti-Slavery Commission (IASC) found that once a referral is made, many victims are not receiving 'meaningful support or intervention' (2020: 17).

Safeguarding and the NRM are distinct processes, which are sometimes conflated and misunderstood (IASC, 2020). NRM referrals are made to and decided upon by the Single Competent Authority (SCA), as part of the Home Office, while safeguarding assessment and provision remains with the local authority. It is the view of the IASC that any NRM referral should be made *after* safeguarding measures are in place, and be multi-agency led to ensure that it contains all relevant information about the alleged victim (IASC, 2020). Taking the distinction between NRM and safeguarding into account, participants were doubtful about what partners realistically provide once safeguarding referrals were made:

‘We [the police] are really conscious that we identify a lot of people who are vulnerable, so the question is what we are we doing about that? The answer is, we are filling out the relevant bits of paper and that is that. When I ask what we are doing about safeguarding, [I am told] “yeah, done all the referrals.” That sounds good, so someone must be picking them up, mustn’t they?’ (Participant 2, DCI)

Participants questioned the extent to which the police are the appropriate agency to conduct safeguarding activities, beyond managing the immediate threats to an individual:

‘My view of safeguarding has changed significantly in this job because what we try to do as police, is that we think we take responsibility for safeguarding a young person. But that is not our job. We can do safety planning, absolutely, and that is our job, thinking about what we need to do here and now to manage the risk to this young person. But actually, safeguarding is a job for other organisations.’ (Participant 1, DCI)

It was suggested that because the *primary* role of the police is perceived as law enforcement, it may be difficult for potential victims to trust them and engage in safeguarding:

‘If you were interviewing me [and] trying to get me to admit what I have done, and then flick the switch and [say] “right now I want to talk to you about [safeguarding].” Am I going to trust you? Is that role of wrapping an arm around a person best performed by the [police] that is also managing the prosecution? No.’ (Participant 5, DS)

According to Coomber et al. (2023), the police have little option but to be seen to act in the context of vulnerability and exploitation, often doing so symbolically at an organisational level; while ‘running ahead of practice at the coalface’ (2023: 106). However, this general observation appears contrary to the genuine efforts and personal concern reported by the participants herein, deficiencies in safeguarding appeared as a consequence of the current legal and CJS procedural framework and contingents arising *after* police referrals were made.

The current arrangements for children and vulnerable persons involved in ‘County Lines’ appear problematic, given inadequate screening and risk assessment for matters of neuromaturation, neuro-impairment and neurodiversity, legal and procedural difficulties in recognising and dealing with the complex intersectionality of victimhood and offending, inconsistent and uncertain outcomes of NRM and safeguarding provision, and a conflicted role for the police as ‘enforcer’ and ‘protector.’

In summary, the current situation is a real-world illustration of a strangely hybridised form of welfare, law and order and actuarial assemblages that blend in a contradictory yet loosely compatible way (Goddard, 2012; Gray, 2016; Haines and Case, 2015; Muncie, 2006).

However, such compatibility arises through the efforts of constituent parts of the CJS to *make*

it work, with what seems only partial penetration into the real complexity and persistency of the policing problem.

Concluding remarks

The study aimed to elucidate practitioner experiences of dealing with victims and offenders involved in 'County Lines' drug supply networks. Specifically, by focusing on the investigative and case management challenges they faced, and how issues of vulnerability, safeguarding, and referral were presented and acted upon, within the current legal and policy framework. The strength of the study is that it capitalises on the knowledge and experiences of specialist officers directly involved in investigating the problem of 'County Lines' drug supply networks. Notably, this is not a cadre of participants that is readily available to researchers. The weakness is that the participants represent a small sample from one police service. However, the findings and discussion points are supported by cognate research and official reviews and reports, and the empirical research presented here provides practice-focused insight into this complex crime investigation situation, offering potential for impact in developing areas of law and policy reform, and professional practice.

'County Lines' is considered of such significance as to require a nationally coordinated response through the NCLCC and significant levels of investment through the NRM Transformation funding. Yet, it is striking that it remains bound by such a legal and policy framework, not meriting specific legislation and a more innovative approach to understanding child offending. Put simply, if the current approach 'works' and is fit for purpose, then why does 'County Lines' remain such an intractable policing and crime problem in the UK? While limited success is reported, often accompanied by dramatic headlines about police raids and images of arrests of violent gang members, this appears more due to the dexterous efforts of

those professionals involved, in forcing an amorphous solution upon the problem. Moreover, bearing in mind that many of those involved at the lower levels are children and vulnerable persons (the former vulnerable parties by definition), the need to develop and implement a different approach is surely imperative: through legislative and drug policy reforms, improved risk assessment and forensic screening, better liaison and diversion services, and requisite training and development for those engaged in its delivery.

Further interdisciplinary research is necessary in two related areas. First, theoretically, and empirically de-constructing the complicated intersectionality of victimhood *and* offending, to understand the precise points at which the police and CJS services can make more meaningful interventions, in a resource-limited public sector environment. Second, establishing credible datasets on the full extent and impact of neuromaturation, neurodevelopmental and neurodiversity issues, specific to ‘County Lines’ cohorts. Opportunity exists here to develop ‘system-wide’ reform and a new paradigm for policing and the wider CJS.

Declaration of Conflicting Interests

The authors declared no potential conflicts of interest concerning the research, authorship, and publication of this article.

Funding

The second author acknowledges receipt of bursary funding from the UK College of Policing to support the course of study, during which the research was conducted.

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Accepted for Publication