National County Lines Coordination Centre

NCA  NPCC  ROCU
National Crime Agency  National Police Chiefs’ Council  Regional Organised Crime Unit
National ROCU Network

NCLCC  County Lines Strategic Assessment 2020/21
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Title: NCLCC County Lines Strategic Assessment 2020/2021

Summary: Strategic Overview of County Lines and Law Enforcement Activity 2020/2021

Branch: National County Lines Coordination Centre

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Foreword

As joint Gold Command for the National County Lines Co-Ordination Centre (NCLCC), we are both delighted to release the County Lines Strategic Assessment 2020/21. Since the County Lines Strategic Assessment by the NCA in 2018, the law enforcement landscape in how we tackle county lines has changed dramatically, in relation to both our knowledge, safeguarding and enforcement activity.

The assessment details the huge strides that have been made, across all 43 forces, who have worked in conjunction with the NCA to tackle this terrible criminality. This success has only been possible due to the enormous efforts across policing, the regions, the NCA and partner agencies. Although we have made huge inroads in tackling this type of offending, it has not been solved. We still have much to do to ensure that we create an environment where the county lines offending model is high risk and as hostile as possible to line holders and their associates, to protect our communities.

Home Office funding in November 2019 allowed us to establish dedicated County Lines Taskforce teams in the three main exporting force areas (West Midlands, Merseyside & Metropolitan Police Service), as well as the British Transport Police. Prior to this, policing found it challenging to establish an effective approach to co-ordinate how we could tackle those controlling the lines and exploiting the vulnerable. County lines is a drugs distribution model, which moves cross border and requires investigators at both ends of the line, working jointly to identify and bring these drug dealers to justice. The report describes how both exporting and importing forces, along with the NCLCC have established joint working practices, so that all are now working hand in glove. The NCA are focused on working with international law enforcement to target traffickers in source countries. They are working closely with Border Force to prevent and seize drugs importations.

This joint activity has seen us specifically target those controlling the line, the drug dealers that exploit young people to act as their runners, use vulnerable adults so they can deal their drugs from cuckooed addresses and in turn cause misery in our communities.

Through the work of the NCLCC and the exporting forces, we have established a methodology which allows us to identify, arrest and charge these drug dealers, often without them being found in possession of drugs. Due to the overwhelming weight of evidence, we are seeing these line holders pleading guilty at an early stage and the lines being closed for good. We are also working with phone companies so that offenders can no longer hide behind the anonymity of unregistered pre pay mobile phones.

We are grateful to the Home Office for their continued support, as we move forward in our fight against county lines. As we look to the coming year, there is still much to do. We will continue in our relentless pursuit of these dangerous line holders and their associates. The learning of the past year is being shared across law enforcement and we are determined to increase our focus on the vulnerable that are being exploited. This will include increased proactive safeguarding through the use of the Modern Slavery Act 2015, so that these drug dealers also face modern day slavery charges where appropriate, to reflect their exploitation of the vulnerable.

Within the NCLCC, the NCA has successfully established an illicit finance team, which targets the flow of cash within the drugs tier model, seizing assets from those profiteering from drug dealing. The NCLCC Orders team support our proactive safeguarding objective, so that we can obtain risk and prevention orders, the main objective of which is to protect the vulnerable and restrict opportunities for line holders to re-offend. The NCA will continue to work with policing, as they tackle the drugs market at the upper tiers, with the objective of choking the supply of cocaine and heroin into the county lines market.

There are still many challenges ahead, but the last 12 months has shown that by working collaboratively both within law enforcement and with external partners, we can make inroads into this abhorrent crime. Our objective is to eradicate county lines and it is imperative that we maintain the momentum that we have built over the past year, so that we can protect the vulnerable and our communities.

Deputy Assistant Commissioner Graham McNulty
NPCC Lead for County Lines

Nikki Holland
Director of Investigations, NCA
1. Executive Summary

County lines continue to be at the forefront of drug supply nationally at the key axis where supply meets demand in towns and cities across the country. County line networks have continued to evolve in response to both environmental changes, including an unprecedented national lockdown and a significant increase in policing activity.

The current county lines business model remains heavily weighted towards the supply of heroin and crack cocaine, (see sec. 2 - Supply and Demand) utilising mobile phones to advertise through bulk texts and distribute drugs to both chronic and social drugs users, with the workforce at the lower end recruited from the young and vulnerable in our communities.

Policing has made significant progress this year targeting the “organisers” and “line holders” within these networks, across England, Wales and Scotland. Home Office funding invested in the three main county line exporting forces (Metropolitan Police, Merseyside Police and West Midlands Region) and additionally British Transport Police, has reaped dividends in targeting and dismantling established county lines (see sec. 3: Operational Response).

Importing forces have also had a significant impact through accessing additional surge funding to support operational activity at the end of the “line”, working in collaboration with those exporting forces, as outlined as best practice in HMIC County Lines report 2020 – Both Sides of the Coin. The exploitation of vulnerable children and adults by organisers and line holders is used to maintain control, resource their business model, keep their distance from law enforcement and maximise their profits. Police adoption of “proactive safeguarding” (see sec. 5 - Exploitation) methodology through targeting the organisers and using modern slavery legislation and preventative orders is essential, alongside partner activity in safeguarding the young and vulnerable.

Violence is a key component in county lines and is used by gangs, drug networks and organised crime groups to maintain control. It is used to ensure no competitors take over their lucrative business. Most of these groups have territory within their home forces and violence will erupt either within that territory or at the other end of the county line, within the importing force. (See sec. 6: Violence).

The county line phone number is fundamental to any drug network. Without it the county line does not exist and the supply model cannot function. Use of branding (see sec. 4. Telecoms) by drug networks to market the quality of their drugs, offer special deals and highlight the service they can provide is essential to the business model. Support by phone network providers is vital in supporting policing to identify and target those lines.

County lines is essentially a basic economic model of supply and demand. Tackling the demand as well as the supply is vital for long term reduction. Chronic drug users in our communities are through their own circumstances, some of the most vulnerable in society. Their needs are inherently complex and require multi-agency collaborative working beyond policing. Current Home Office initiative Project Adder seeks to tackle these challenges relating to drug users.
The collection of intelligence is vital to understanding the national county lines picture. This has been supported by the implementation of a Section 5 Crime and Courts Act (CCA) tasking which is currently in place to ensure all forces migrate their county line data onto the Police National Database (PND) during the current transition period which commenced in December 2020.

To complement the enhanced policing activity the National Crime Agency, in conjunction with the National County Line Coordination Centre (NCLCC), has developed a national Drug Tiers Model (see sec 8: Upstream). This is wider than county lines, and outlines the flow of drugs from importation through wholesale distribution down to county line and street level drug supply.

County line networks are continually evolving and policing needs to continue to do likewise. This year the exporting forces have exemplified this through developing their understanding of the county line business model and focussing on the line holders, then through development and sharing of best practise across forces they have evolved into targeting offenders for exploitation and trafficking of vulnerable and young victims.

The NCLCC has complemented this through continued support through a team of Subject Matter Experts (SME’s) to coordinate all national tactical activity, continued intelligence collection and creation and oversight of surge funding to support importing forces. Additional NCLCC support is provided through newly formed dedicated Financial and Orders Teams. (See sec 9: NCLCC)

A common theme in the responses from forces to this Strategic Assessment is the importance of utilising specialist resource. This includes CPS prosecutors within Complex Case Units who support prosecutions under the Modern Slavery Act, Digital Media Investigators and Financial Investigators. Additionally expert forensic advice and support from Network providers and force Communication Units have been described as vital.

2. County Lines Supply and Demand

2.1. County Line Deal Phones

The county line deal phone (see Glossary) is essential to run a county line. The county line deal phone number is distributed to drug users in order to purchase drugs. The holder of the county line deal phone can sit remotely and direct runners to deliver drugs in different forces.

All forces submit their county line deal phone numbers on a monthly basis, which equates to approximately 600 numbers per month nationally. This is broken down into 2 parts.
1. Deal phone numbers that have been submitted in previous months.
2. New deal phone numbers that have not been previously submitted.

At this stage each month both the previously submitted numbers and the new county line deal phone numbers are evenly split at approximately 50% for each. The submission of these numbers is based on intelligence gained from policing activity and other sources of intelligence over the previous month.

Of note, this is a reduction from the stated number of county line deal phone numbers which were shown as 800-1100 in previous reporting. This is believed to be a combination of new guidance introduced in 2020 alongside enhanced operational activity.

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These numbers are only “potential” county lines at this stage and cannot be deemed to be active.

This is because the use of county line deal phone numbers by drug networks is extremely fluid.

County line networks will “chop and change” county line deal phone numbers, sometimes overnight, due to contact with police or moving to a new location to avoid the threat of violence from rival networks.

Exporting forces have highlighted the challenge that potential county line deal phone numbers provided to them by importing forces, are on occasions dormant when they look to target the deal line.

All forces submit their county line deal phone numbers in good faith with the understanding that they are active at time of submission, however to conclusively establish how many county line deal phone numbers are active there would be a requirement for current call data for every submitted line which would only provide a snapshot at that moment in time.

Due to enhanced operational activity and use of telecoms data the 3 main exporting forces are able to identify conclusively those county line deal phone numbers which are active and then adopt the appropriate proactive response to disrupt the network.

Unfortunately there is not the capacity for each force to utilise the same methodology on each deal phone number submitted, hence the challenge of identifying every county line deal phone number that is active at the time of submitting every month. Policing is currently working with network providers to seek further solutions for early identification of active county line deal phones to reduce time in developing intelligence and enhancing the county line response.

KEY RECOMMENDATIONS

- Targeting and charging of organisers and line holders.
- Activity against exploiters within county lines through Proactive Safeguarding.
- Enhanced support from telecom network providers to identify live county lines.
- Continued surge funding to ensure importing forces continue collaborative working with exporters in targeting line holders and organisers whilst safeguarding vulnerable people within their regions.
2.2. Supply

Although there are a large number of new deal line phone numbers provided by forces on a monthly basis, the actual number of deal phone lines remains fairly consistent at approximately 600, which may provide a more realistic view of the number of deal phone numbers in existence at any point in time.

In order to improve understanding of the number of current county lines, new guidance from the NCLCC was introduced in June 2020, requiring submission of county line deal phone numbers only if supported by current intelligence within the last 30 days. The outcome has been a steady flow of around 600 reported deal phone numbers per month inclusive of 300 completely new numbers, contributing to a clearer overall picture.

Enhancing the picture of the lines enables policing to prioritise operational activity against the lines causing most harm.

This is highlighted by the information provided by forces. Mapping county lines nationally (1st November 2018 to 31st October 2019) there were 3464 new county line deal phone numbers identified. In Year 2 (1st November 2019 to 31st October 2020) there were 4002. This increase in overall new numbers was expected due to heightened awareness and understanding of county lines, coupled with increased operational activity generating the intelligence.

Notably, there was a peak of identified lines in Year 2 around September/October 2020. This coincides with Intensification Week 5. (See sec 3: Operational Response).

The existence of the county line is often found by the importing force as they are impacted by the associated violence, disruption or harm to the vulnerable people within a drugs market. Currently around 70% of all deal line phone numbers have a known origin.

Often the exporting forces will have little knowledge of the line until the importing force consults them.

There is a high level of regional variation in respect of identifying the origins of the county line deal phone number. Some areas have seen improvement such as South East, South West and West Midlands. Scotland identify origins for all their reported deal phone numbers and have done so across both years. North West and West Midlands are both over 90% for the current year.

The graph above shows the regional change in numbers of new county line deal phone numbers identified over the last two years. These are analysed locally, regionally and nationally.

Some of the larger increases can be seen in regions which host exporting forces (West Midlands, North West and London) or are known to be heavily impacted by the exporting forces, such as the eastern region.

The Metropolitan Police has seen the largest increase, reporting three times the amount in Year 2 than it did in Year 1. The MPS is the top exporter of county lines and a baseline assessment in March 2019 established at the time they were exporters of approximately 25% to 30% of all identified county line deal phones nationally. The work of the MPS task force, Operation Orochi, has led to the MPS identifying many more county line deal phones themselves. (See sec 3: Operational Response).

2.3. Branding of Lines

Like any business, county line networks use brand names to advertise their products. This assists in building a customer base, ensuring loyalty from drug users and confidence that the product is of a certain quality. Additionally, it enables the networks to offer deals and draw in new users through social media and word of mouth.

Of note, 142 line 'brand' names are reported by 5 or more different forces. There is a common misconception that the same name indicates that the same drugs network is behind it. In some cases this may be true, but it can be beneficial for the drug networks to replicate brand names for marketing purposes to cash in on a popular brand name.

Another popular brand name used numerically is “SCOUSE” followed by a name i.e. Scouse Porky (see sec 7: illicit finance), Scouse Paul, Scouse Mark etc. They are not all linked, however 6 versions of the “SCOUSE” brand name have been seen to run from Merseyside to Aberdeen organised by the one criminal network.

The RICO line reported by Surrey is linked to 28 telephone numbers over a two year period, originating from multiple different towns in Surrey. In Year 1 there were 24 identified lines. Following police and partner action, in Year 2 it has only 4 linked lines. Analysis has confirmed them to all be from the same criminal network.

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The top individual brand name “MAX” is reported by 31 different forces. Whilst there may be some level of crossover, most of these are unconnected. It is likely to be a combination of multiple networks working with a franchise model and/or simply an easily recognisable name used by lots of unconnected groups.
2.4. Demand

Understanding the level of demand within any town or region is key to understanding the likely supply that will be forthcoming. Currently we have an understanding of those users seeking treatment but do not know the level of users both casual and chronic who are not seeking treatment and are purchasing from county lines. Not all the data is available but a compilation of police, local partner and Public Health England data would provide a richer picture.

By understanding the level of demand it would enable policing to predict levels of supply required by drug networks to fuel the demand also when market saturation is likely to occur.

Market saturation generally takes place when county line networks identify a location with a large number of drug users and therefore the potential for a profitable county line. Other drug networks subsequently move into the area resulting in serious violence as the supply outweighs the demand and networks fight over profits. Understanding the demand would enable policing to have an early indication of when market saturation is likely to occur.

“The cocaine market across England, Scotland and Wales is now estimated to be worth between £9.4 billion and £11.8 billion annually, and over £25.7 million daily”. (NCA SA 2020)

The county line market is predominantly crack cocaine and heroin and this is not changing. Crack cocaine and heroin offer high reward in the profit margin available, but this means working with the highest risk customer base. Within the county lines context, supply of crack has remained consistent across the two years with approximately 70% of lines supplying it both years. Heroin use has seen a decrease from approximately 80% of lines supplying in Year 1 to 70% in Year 2.

As has been highlighted by Dame Carol Black, the heroin market is stable in size, but ageing and with age these people are now susceptible to many other medical problems. It is not a drug that is attracting younger users in the same way that crack appears to.

Heroin users are often vulnerable due to being victims of serious abuse, homelessness or having been incarcerated. There are dedicated support services to help this vulnerable cohort of users. There are medical replacements for heroin and the support services do report consistent successes if they are able to engage with the user.

The crack market is increasing and there is no medical replacement to enable treatment programs. Older heroin users will also use crack whilst younger users will take crack with other products such as amphetamines and MDMA.

Other drugs mentioned in county line reporting include at varying frequency: - amphetamines, cannabis, spice, ecstasy, methadone, diazepam, skunk, Xanx and Mcat.

Individually forces are reporting other drugs are popular in smaller localised areas for a number of reasons including when police activity has led to a shortage of Class A supplies or a branching out of the market. Tragically this may also identify where incidences of overdoses are noted. Dyfed Powys reported such a series where Valium had been laced with other chemicals.

After crack cocaine and heroin, cannabis is the most regularly mentioned drug within most forces. Many of the large OCGs that are supplying powder cocaine at importer level and below also have clear and well documented links into cannabis production and supply. At a county line level the infrastructure exists to supply localised vulnerable markets with a range of commodities.

2.5. Crack Cocaine Manufacture

The manufacture of crack cocaine within a county line context requires no specialist equipment or product that would stand out in any average family home. It is a relatively low risk criminal endeavour and there is nothing that signposts the status of the venue. There is generally no contact with the customer base. The money is earned by the “cook or chef” by the level of skill in the task. The best can produce better profit margins for the onward dealer.

The product will in some cases be manufactured at the same location where the drugs are dealt from, but more often the product is formed elsewhere and most likely cut or chopped and wrapped into deals by exploited children/adults in a “trap” house.

In smaller networks crack cocaine is produced by the line holder. Good policing practice on drug searches identifies the everyday items that are being used in crack manufacture, including kitchen equipment and cutting agents.

PROJECT ADDER – (Addiction, Diversion, Disruption, Enforcement and Recovery) Home Office and Department of Health sponsored initiative to deliver reductions in the rate of drug deaths, drug related offending and prevalence of drug use. By analysing the economic and societal benefits to test the impact of interventions. The initiative is planned for 7 areas.

RECOMMENDATIONS

- Enhanced support from telecom network providers to identify live county lines.
- Enhanced policing focus on “cook houses” to identify crack manufacture points and disrupt the county line supply line.
- Target county line networks with Branded lines featuring multiple lines into multiple locations.
3. Operational Response

Over this reporting period policing activity has significantly increased with exporting forces and importing forces having raised their awareness and understanding of county lines and dedicating resource to tackling county lines on a day to day basis outside of intensification weeks.

Previously some forces have targeted drug runners who are in plain sight, but there has been a distinct change in policing with a concerted move to target and charge both line holders and organisers of county lines for drug supply and wider exploitation offences, which has reaped benefits in tackling county lines.

This activity has been supported by the Home Office with dedicated funding provided to the three main exporting forces (Metropolitan Police, Merseyside Police and West Midlands ROCU) and British Transport Police. The investment of dedicated teams in these forces has transformed the response to county lines.

National county line intensification weeks (IW) have continued to deliver significant disruption with the last IW conducted between 14-20th September 2020 producing the most significant policing response to date, including 1041 arrests and 102 deal lines seized.

The cities of London, Liverpool and Birmingham have remained as the top 3 exporter areas. These 3 forces account for approximately 80% of all lines when the origin of the line is known. West Yorkshire and Greater Manchester Police make up the overall top 5 in both Year 1 and Year 2.

Merseyside Police and West Midlands ROCU have significantly increased with exporting forces, focussing on safeguarding under the overarching name of Project Medusa.

The wrap around approach favoured by Merseyside has seen them work with 15 forces and 19 third sector partners. North Wales, Cheshire and NW ROCU areas are key importing areas for Merseyside county line networks. Cheshire alone imports 41% of the regional county lines. Lines have been found running further afield into the South Coast area including Devon and Sussex.

Merseyside additionally directed funding towards 2 specialist digital forensics staff aligned to the county lines teams.

The police response to county lines.

3.1. Merseyside Police

Merseyside's objective was to coordinate joint operations with importing forces, focussing on Operation Medusa to their homicide and violence reduction initiatives. Also of real importance from their learning outcomes is understanding the impact of the demand from the drugs markets.

Merseyside state the multi-agency approach has a significant impact on the local markets. Arrest phases are attended by safeguarding teams from Operation Stonehaven with full engagement of partner agencies. Any identified vulnerable adults or children are dealt with immediately and given access to support.

After the deployment and seizure of the device, the “PESTER” tactic is used, where messages are broadcast to the customer base of the deal line from Merseyside Police, signposting support services for drug users. Many of the agencies and charities have added they welcome the PESTER messages.

Merseyside have linked the work undertaken in Operation Medusa to their homicide and violence reduction initiatives. Also of real importance from their learning outcomes is understanding the impact of the demand from the drugs markets.

In response to one of the key intelligence gaps from the national intelligence picture: illicit finance, Merseyside have reported through Operation Denarri a trend of significant amounts of money being laundered.
CASE STUDY - Merseyside and North Wales Police

October 2019, intelligence linked the supply of Class A drugs in Bangor to Merseyside based OCGs, including the JB Line who were using Merseyside youths as runners. Four controller lines were identified and NWP provided intelligence to the Op Toxic investigation team.

A total of four lines were closed due to Pester activity and disruption warrants resulting in the arrest of 6 males.

Merseyside also worked in collaboration with NWP to conduct disruption tactics in the Bangor area and resources to frustrate activity along the main arterial routes into North Wales. This intervention led to the identification of an adult male who was a victim of cuckooing and the further arrest of four Merseyside individuals for drug supply. The continued activity led to the eradication of Merseyside based county lines within Bangor for a number of months.

The JB line re-started in December 2020. A vehicle was identified. The vehicle was stopped by NWP and the controller phone recovered from the vehicle and 3 males arrested for being concerned in the offer to supply controlled drugs. Since that intervention no further Merseyside county lines have been linked to Bangor.

3.2. Metropolitan Police

County lines and those individuals involved emanate from all 32 London boroughs. There were 98 separate urban street gangs identified and reported on as being involved in county lines. When looked at geographically the top 3 identified boroughs as the origin for deal lines were Greenwich, Brent and Hackney. The top 3 for individuals linked to involvement in county lines were Newham, Croydon and Waltham Forest. However when broken down by age top 3 identified boroughs for juveniles identified in a county line context were Croydon, Lambeth and Waltham Forest.

The MPS had clear objectives to identify, arrest and charge line holders. This activity commenced under Operation Orochi. The team formulated a strategy to simplify and streamline the evidence required to charge and prosecute line holders and to obtain this information pre arrest.

They also developed a fast time manhunt capability recognising that frequently the London based line holders were involved in further offences including most serious violence, firearms and murder. They have been able to support a number of murder enquiries both within the MPS and beyond.

Operation Orochi became the accelerator to wider MPS organisational activity being conducted by local policing through to Specialist Crime teams during 2020.

CASE STUDY - Norfolk Police working with Op Orochi

The Orochi tactics led to the remand of line holders upon arrest, therefore preventing reoffending by these nominals, and in many cases was enough to close the line permanently. Key to success was training of officers to understand the opportunities which are afforded seizure of county line deal phones. There were cost savings in the judicial process due to a high volume of cases entering early guilty pleas. A cohesive media campaign aimed at raising awareness to the public, victims and offenders has also been very effective and key to supporting the work of the police activity.

- Average of 55 days between inception of investigation, and enforcement/line closure.
- Average of 112 days between date of arrest and conviction.
- 100% of line holders charged and remanded on the day of arrest.
- 100% conviction rate so far (4 cases pending trial).

Operation Orochi undertake analysis of data collected on all line holders arrested, phones seized and other key information. With over 300 line holders arrested, some holding more than one telephone line (326 handsets) profiles can be created and information shared.

The chart on the next page shows the basic profile of the line holders and lines. The pattern of communication and behaviour of the dealing line supports the four main methods of supply within county lines. (see sec4: Telecoms).
The implementation and delivery of the Orochi approach, both with new operational tactics and live collaborations has afforded new opportunities to develop the methodology and apply it to exploitation, violence and drug supply. In order to ensure that the unit delivers with optimum efficiency against anticipated demand, Op Orochi is implementing a four strand approach that complements the existing work of supporting referrals from county forces. The strands are as follows:

**Modern Slavery** – Op Orochi extends the use of communications data to not only show the operation of the drugs line, but also the exploitation element. This evidence-based approach negates the need for a victim and enhances the existing safeguarding menu of options by cutting the chains between exploiters and the exploited, and reducing the risk of reprisals.

**Multi agency operational partnerships** – This strand aims to work with BCU assets to target high-harm gangs involved in county line activities by identifying all those involved in the drug supply network and bringing them to justice. This approach maximises efficiency as a single resource and can be used to simultaneously target county lines, drugs supply within London and the linked violence.

**Multi force operational partnerships for county line investigations** – When intelligence identifies a gang or OCG controlling multiple lines, with multiple line holders in several counties, Op Orochi bring all evidence together to provide a far greater impact and response. This approach also enhances efficiency as it avoids duplication of effort and draws upon a wider pool of resources from all affected forces.

**County lines related homicides** – Where such offences are linked to county lines activity, Op Orochi use their knowledge of drug lines and experience/skills to assist with the rapid progression of the investigation. This input, particularly in the early stages of an investigation, ensures that offenders are identified and brought to justice as quickly as possible, thereby limiting opportunities for them to cause any further harm.

**CASE STUDY - MPS and Devon and Cornwall Police**

D&C contacted Op Orochi following a suspicious vehicle being stopped in Torquay containing five occupants; Omorie Nixon, Itman Ismail, two juveniles and a local male habitually involved in drugs supply. Police subsequently arrested all five as both juveniles disclosed that they were ‘plugging’ drugs. Officers recovered the drugs and bailed all five after interview. A review revealed links to the “Frosty” drugs line.

Ismail was the assistant manager for a children’s care home in Redbridge. Nixon was under the care of the group after release from HMP Feltham and Ismail was his key worker. Evidence shows they began travelling the country, drug dealing, using and exploiting youths from the Ilford and surrounding areas as “workers”.

The Orochi team provided assistance with all of the London based enquiries in respect of the care home, as well as all of the telecommunications enquiries. Almost immediately after referral, D&C proactive teams recovered a third juvenile, reported missing from Middlesex, in Torquay from a cuckooed address, also plugged with drugs. Evidence suggested that he too was working for the “Frosty” drugs line.

Op Orochi evidenced that Nixon was the Line Holder of the Frosty Line and was connected to a number of juveniles from London and the Home Counties.

The Orochi team led on the arrest phase locating Nixon and Ismail together in a hire car heading out of London. Police arrested both parties and subsequent searches uncovered a large quantity of Class A drugs at Nixon’s address, bundled into ‘plug’ shaped packages. The pair were transported to Torquay police station, and the two investigation teams worked together to secure charges through CPS Direct for conspiracy to supply Class A and modern slavery offences.

The Orochi team was able to demonstrate Nixon was running two county lines to Torquay and High Wycombe, the involvement of his partner Ismail, and the exploitation of children being used as ‘mules’ to carry the drugs inside them. This work met all of the evidential points for human trafficking, without a statement from an exploited person. On the first day of the trial Nixon entered a guilty plea to conspiracy to supply Class A drugs and 4 x human trafficking offences relating to the different exploited children. Ismail entered guilty pleas to 4 x human trafficking offences.
3.3. West Midlands ROCU

Home Office funding was used to create a ROCU based County Line Taskforce (CLTF). The rationale behind this was clear. 63% of their county lines were being imported and exported from within the West Midlands Region.

Within the ROCU, the taskforce had close access to region wide technical capability, covert and overt asset. The money also funded key analytical capability within the forces to ensure the best intelligence picture was gained with dedicated resources, for continuity.

The CLTF initially identified the critical role of neighbourhood policing within the County Lines intelligence model.

Drug users who are targeted through the county lines business model are known to the police community teams and will often interact with local officers. Building upon engagement and developing relationships with the drug users has been key to the success of CLTF getting the best and up to date intelligence.

This is positive news for reducing to demand within the drugs market. The CLTF also found targeting the message to the market enhanced the results. Recently the CLTF identified a powder cocaine line which had a very different customer base to the heroin and crack market. The users included a number of professional people. The pester messages here have led to more referrals to support services and a far greater impact on the market in terms of disruption.

3.4. British Transport Police

The train network is key to the county line distribution model. British Transport Police received Home Office funding in recognition of this and their essential contribution when understanding they are most likely to intercept vulnerable children. This is recognised through BTP being the biggest reporter of intelligence related to children linked to county lines.

BTP’s Control Strategy (2019 – 2022) reinforces county lines as a force focus alongside the formation of BTP’s dedicated County Line Task Force in 2019, the ongoing funding has enabled both a larger and specialised team of officers to conduct joint operations across the country (254 joint ops 01.12.19 – 13.01.21).

BTP has prioritised a number of key locations to focus operational, target-hardening activity on the railway network in response to the county lines threat. These Priority Tasking Locations, as recognised in the Force Tasking and Coordination Group, have been identified through the assessment of both BTP crime incidents and the national intelligence picture, which maps the top importer and exporter locations within the NCLCC Quarterly Threat Update. BTP also regularly receives requests for and provides support to Home Office force initiatives at station locations in response to locally identified risks.

Clift undertook targeted activity against the line holders through operational deployments. Further disruption tactics have seen the CLTF become the highest applicants for DDTRO’s.

Once a DDTRO is completed the whole handset is discarded.

CLTF have also engaged in the operation “Pester” tactic of sending broadcast messages. This highlights police awareness of the drugs line, and also signposts access to support and charitable organisations. There have been some effective outcomes of drug users seeking support for their addiction.
3.5. Missing Children on the Railway Network

BTP regularly finds missing children nationwide and with the COVID related fall in customer base of around 80%, children have become more visible to officers. BTP is developing communication data skills, tapping into intelligence that can be provided from partners in the rail industry, such as those members of staff at the stations and penalty fare databases. A campaign to promote “professional curiosity” has been launched, so that when children are found unaccompanied the right questions are asked not only to return them to a safe place, but to better identify exploitation so it can be investigated.

BTP has found it to be of particular value to utilise industry intelligence too. Access to repeat fare evading within children is a really effective method of identifying risk, due to it being a clear indication of a child being trafficked on a county line.

Due to the significant number of children identified, they have developed a joint agency strategy meeting when they are in custody. This is an effective safeguarding measure to ensure any signs of exploitation are identified immediately and dealt with. This strategy meeting provides a fuller understanding of that child’s background and history. BTP have also developed a Section 45 (MSA 2015) pre-emptive disclosure pack which assists in drawing out a Section 45 defence earlier than currently experienced.

3.6. Importer Forces

Whilst significant progress has been made by the 3 main exporters this year, this is complemented by the substantial operational activity undertaken by importing forces. As previously mentioned a county line has a minimum of two forces involved and collaborative activity is key to reduction. Importer forces will usually identify the lines first, as they tackle the policing and safeguarding demand generated from the presence of a line and the network behind it.

The Home Office has provided additional funding, managed through the NCLCC, which allows importing forces to bid for assistance with specific operations. Through this funding there have been 28 operations since June 2020 supporting impacted areas. These operations have led to nearly 600 arrests and 266 charges with county lines offences, multiple kilos of drugs seized including crack, heroin, cannabis and amphetamine and approximately £300,000 of cash seized. 12 modern slavery investigations have been instigated from the operational work.

The increased activity of this year has proven the ability of the forces to work together to tackle county lines. The identification of the lines comes from the awareness of the local forces of their local drugs markets. This has also increased the amount of intelligence harvested and reported back into the NCLCC. The analysis of the enhanced picture increases the identification of cross overs and connections nationwide. This helps support the operational work of the taskforces in all areas.

GOOD PRACTICE - Hampshire Focus on Education

Hampshire have employed two education partnership managers to deliver drugs and gang training at high risk education sites.

CASE STUDY - Proactive use of ANPR by North West Region.

The NCLCC / ROCU intel team set aside time each week to all proactively look for vehicles together, sharing best practice and ideas. Cross search of high export area in Merseyside with high import area in Cumbria found a vehicle thought to be linked to multiple county lines. It was stopped a few days later with 450 wraps of heroin and cocaine seized. Those arrested were already known to police linked to drug supply between Merseyside and Cumbria.
3.7. NCA

The NCA in conjunction with the NCLCC have developed an End to End Drug Tiers Model. The NCA have analysed multiple upstream investigations, this analysis shows the connectivity between upstream operations and local drug use in UK communities. The developed model encompasses all aspects of drug supply. The NCA’s investigations into upstream drug importations are key in choking the supply chain that feeds county lines (see sec 8 Upstream).

3.8. Intensification Week

The latest Intensification week was conducted in September 2020. A week of co-ordinated activity directing policing and partners towards county lines across the country. During the course of the week over 1000 people were arrested, 20kg of crack, 21.3 kg heroin and 21.9kg of powder cocaine was recovered. Approximately £1.2 million worth of drugs alongside £500,000 cash was recovered. 150 bladed weapons including swords, zombie knives and hunting knives were seized alongside 18 firearms including pistols, shotguns, imitation firearms, CS gas. Alongside the pursue activities 69 people were subject to NRM referral and 900 Cuckooed addresses were visited. Moving forward, post lockdown, it is the intention to have a dedicated intensification week on proactive safeguarding.

3.9. Police National Database

At a strategic level the NCLCC looks at intelligence that identifies nominals and deal line numbers found by different forces every month. This is currently supported by a Sec 5 Crime and Courts Act tasking requiring the compliance of all forces.

As of December 2020 all forces now upload this intelligence onto the Police National Database (PND). The data will be automatically cross referenced against various markers and intelligence systems including OCGM (Organised Crime Group Matrix) and modern slavery investigations.

The markers on PNC should be visible as well as the PND markers, both of which are warning signals about harm or risk. It will also identify where there are other known risks such as information about firearms, exploitation or domestic violence.

CASE STUDY - NCA Operation H and Operation P

Operation H is an investigation into some of the largest seizures of Class A drugs ever seen in the UK.

In September 2020 more than a tonne of Class A drugs – 1,196kg of heroin and morphine derivatives – were recovered from a container ship after it docked at the port of Felixstowe. The NCA have mapped this against the End to End Drug Tiers Model to trace the downstream links into county lines.

In a separate investigation during September 2020 Operation P investigated the seizure of over a tonne of cocaine that was detected at Dover concealed within bananas that had been imported from Ecuador to the UK. Mapping this against the tiers model was key to identifying downstream links and finding connections to county lines. Continued analysis of large scale seizures such as these help us better target, disrupt and choke supply into county lines.

Operational intelligence will be visible to all forces impacted by a drugs network or dealing line within a few hours allowing forces to make informed decisions about where to deploy their limited resources.

3.10. Specialist Support

Exporting forces have highlighted the benefit of obtaining specialist SPOCS within the CPS to assist with all county lines cases. Obtaining the information to secure modern slavery charges and notably the orders in relation to the charges has proved successful in regional areas who have the CPS specialist points of contact.

Forces have highlighted the need for specialist support during operations. Often the larger exporting force provides asset, but it will be the importing force that will inevitably take the case through to prosecution. Establishing a strong relationships with the CPS is key to achieving successful outcomes.

GOOD PRACTICE - Thames Valley Police FIB County Lines Bulletin

Thames Valley Police are surrounded by exporting areas and produce a document every two weeks to share activity and intelligence with all requesting forces. Document lists all types of action taken including arrests, missing children found, seizures, interesting trends or behaviours, numbers and lines identified or found.

RECOMMENDATIONS

- Forces to consider obtaining sufficient evidence to charge line holders on arrest, reduce Released Under Investigation (RUI) and increase pleas prior to court as per Op Orochi.
- Forces to consider utilising “Pester” tactics alongside support of relevant partner agencies.
4. Telecoms

County lines is a distribution model selling drugs via mobile phones. There are four basic methods seen by police.

Most county lines follow one of the methodologies shown in the chart. It's a simple illustration and while occasionally other methods will be found these are the most prevalent.

Working with partners helps to identify the most common users in a particular market area.

These people are the most likely to sell their phonebooks or be coerced, forced or tricked into sending the marketing messages. For policing they offer clear insight into new lines, when a line is active and which new networks are filling in the gaps in the local market. Raising awareness of this to local policing teams provides an opportunity to obtain vital local level market information.

4.1. Telecoms and Social Media

Police and partners report instances of county line activity on various apps. Older smartphones can now be purchased for around £40. Many high street venues will allow you to charge the phone and use WiFi for free. Potentially it may only be a few years (maybe less) before even the most challenged user will have access to social media.

The younger cannabis market, the chemsex market and elements of the social drug scene are already extensively working in this space. Focused efforts into the potential changes in county line investigations and policing methodology are needed as the shift happens. The NCLCC are actively working with partners, the county line taskforces and other specialists to develop suitable methodologies.

RECOMMENDATIONS

- Continued work to improve the level and quality of data in support of law enforcement, particularly in regards to high risk and harm situations.
- Continue to develop tactics for online markets and share best practice.
- Ensure development of suitable technology to ensure the county lines dataset is fully exploited to tackle most serious violence.
5. Exploitation

The majority of the harm and risk caused within the county lines business model is created through exploitation. The exploitation cycle of recruitment, grooming, debt bondage and trafficking has an impact on society in a variety of ways. The true extent of the scale still remains partially undeveloped. However, we see trauma through serious violence, mental ill health, physical trauma, sexual violence and many other forms.

In order for police and partners to tackle exploitation, collaboration is required. Information sharing, engagement, diversion and early identification all assist in protecting those most vulnerable from exploitation.

It is imperative that statutory and non-statutory agencies are all involved. The NCLCC has advocated the use of “proactive safeguarding” which seeks to address vulnerability and safeguarding issues early, but crucially by identifying and targeting the source of the harm, through the offender themselves. Use of powers through legislation is absolutely vital in tackling exploitation for protecting the victim and targeting the offender.

The NCLCC has developed the Vulnerability Assessment Tool which has been rolled out in 29 force areas and local authorities. It was highlighted as best practice and became a recommendation in the HMICFRS 2020 report on county lines “Both sides of the coin”. Other forces have adopted similar tools but it is important that any process implemented by forces, local authorities and other partners, has a method of identifying and case managing vulnerable people, understanding the risks posed and having accountability for areas of responsibility.

To progress the use of “proactive safeguarding” the NCLCC has devised a National Orders Team, with the principal objective of increasing the number of criminal and civil orders applied for across police forces and granted in a county lines context. This is achieved by providing resource support to investigators across all forces, dissemination of comprehensive intelligence packs of victims and perpetrators of exploitation/trafficking, and training and best practice to embed cultural change in tackling exploitation more proactively.

The work of the orders team also complements the increased use of the Modern Slavery Act (MSA), to tackle perpetrators of exploitation and trafficking specifically linked to county lines. There have been challenges around the use of the MSA, including the role of the NRM in criminal proceedings, the section 4S defence, evidential challenges, as well as ensuring that perpetrators on drugs lines are criminalised for all of their criminality.

That said, policing has clearly tackled the MSA challenges head on. A current snapshot of live modern slavery charges shows nationally there have been in excess of 60 charges for modern slavery in a county lines context. There are increases in the number of prosecutions, year on year. It is also vital that this legislation is used to disrupt and prosecute offenders who are exploiting and trafficking vulnerable people and children. Where necessary, they must be subject to slavery and trafficking orders thereafter to prevent any further risk to society.

5.1. Cuckooing

Cuckooing continues to be part of the prime methodology of the county lines criminal networks. There have been no predominant vulnerability types for victims of cuckooing, but it continues to affect vulnerable adults who suffer from addiction to drugs or other substances, adults who may become involved in a relationship with the offender as part of a targeted grooming process, or victims who are in poverty or are in need of money desperately and again become targeted through a grooming process. Partner agencies have highlighted the risk presented to young adults as they move out of the care system and into independent living for the first time as a particularly vulnerable time. As with all types of exploitation, a full multi-agency response must be galvanised.

There are funded opportunities to link law enforcement alongside multi-agency responses including Project Adder and Heroin and Crack Action Areas “HACAA” which are key initiatives to link into. Cuckooing victims would be at the heart of the responses where county lines links exist.

Additionally, the NCLCC has identified all cuckooing initiatives nationally and is sharing learning and best practice with all forces via workshops to ensure everyone has an opportunity to implement a local policing plan, using tried and tested methods.

CASE STUDY - South Wales Police Modern Slavery Prosecution

The defendant contacted the victim (16-years-old) who was from North London and was in foster care. He told the victim that due his brother being arrested the year before, and that the commodity had been lost, the victim now had to work to pay off the drugs debt. The victim was conveyed to Swansea by the defendant where they stayed for 4 days and the victim worked for the defendant. The defendant went back to London, and it was at this point that the victim went to Swansea police station to seek help.

A warrant was executed at an address the victim had previously stayed with the defendant. Another suspect, was also located. Within the address cash and weapons were found. Drugs were also seized outside.

The defendant was convicted for human trafficking and PWITS after pleading guilty. He was sentenced to 8 years imprisonment and received a slavery and trafficking prevention order for 12 years.
CASE STUDY - North Wales Police Operation Blue Gem

Bangor initiative whereby local policing officers work in partnership with local housing associations and drugs support agencies. The partnership use information and intelligence to identify potential cuckooed victims. A visit is then conducted at the home address of the potential victim. This may be a joint or single agency visit. If cuckooing is disclosed or suspected, they are offered the opportunity to work with the police to address their vulnerability. Residents who sign up to Op Blue Gem are provided with a poster to display in their window. This advertises that they are part of Op Blue Gem. They also sign a contract of engagement.

One local policing officer in Bangor currently has a cohort of around 25 individuals. They are visited and contacted regularly by her. Efforts are made to quickly address any issues, such as repairing broken windows etc. This provides tenants with reassurance that their needs are being addressed and makes them more likely to trust services and continue with the scheme. The operation leads to greater intelligence collection and there is intelligence to suggest that county lines teams quiz local residents as to whether they are members of Op Blue Gem to ensure that they don’t ‘cuckoo’ addresses which are part of the scheme.

The scheme has been successful in supporting 3 residents to become ‘clean’ from drug use. Good partnerships with health services has resulted in speedy access to drug treatment when the window of opportunity for engagement has been open. The allocation of new SIM cards to some members of the scheme has been a good supportive measure in preventing drug dealers from having continued contact with drug users and has supported their engagement and recovery by removing the pressure from aggressive marketing by county lines teams.

GOOD PRACTICE - Dorset Police Operation Climate

A promising and innovative cuckooing initiative developed by Dorset police. Through nomination by the NCLCC, the initiative has been evaluated by College of Policing through the Vulnerability Knowledge Practice Programme. Using a proactive approach to safeguard vulnerable people within their own homes has been very effective in reducing violence, drug use, Anti-Social Behaviour and has been a key method of further disruption from county lines drugs networks.

CASE STUDY - Surrey Police #SeeTheBiggerPicture

Surrey Police Communications Team and Drugs Portfolio Lead commissioned a problem profile for drug related harm. This indicated a growing trend of young people being exploited through the promise of money or goods.

They ran a ‘Targeted. Tested. Trapped’ campaign, aimed at 12-17 yr olds as they were identified to be the most vulnerable cohort. It was designed to show the harsh reality of drug dealing to prevent young people being drawn into drug supply. The tactics included adverts directed at 40,000 households in Surrey where a 12-17 year old resided. Additionally video adverts targeted programmes and social media. A subsequent evaluation demonstrated the impact of the campaign. One ‘boosted’ post alone on social media reached over 74k (74% of the target demographic) and the TV adverts were watched nearly 180,000 times.

5.2. The County Lines Workforce – Juveniles, Vulnerable Adults and Girls

Approximately 20% of individuals identified within county lines are children. The average age of children seen is 15.8 years old. The overwhelming majority of juveniles are reported as being in a ‘workforce’ role. A small number of juveniles were found to be line holders and therefore in a ‘management’ or ‘middle market’ role. They were all slightly older, between 16 and 17 years old.

Where juveniles are linked to harm indicators the most frequent are being a victim of Child Sexual Abuse and Exploitation (CSAE) or the suspect/offender of serious violence and linked to firearms either through a crime or intelligence. The largest group of children are in the “runner” role and they are the most likely to be exposed to serious violence and firearms.

5.3. Adults

The average age of adults found has risen slightly over the two reporting periods from 29.2 to 30.0. The majority of adults are reported in a ‘workforce’ role which has risen approximately 8% from years 1 to 2. This is because they are being identified as cuckooing victims, coming to notice as their premises are used by county lines networks.

When compared with juveniles there are more adults reported in a more sophisticated role (Management/Middle Market). Like the juvenile analysis on harm indicators the same challenges exist but where adults have been defined as linked to the harm indicators they are mostly suspect/offender of CSAE or serious violence and linked to firearms through crime or intelligence.
5.4. Girls within County Lines

There is disconnect between what is seen in law enforcement and what statutory and voluntary partners see and report in relation to understanding female involvement in county lines. Closer working with partners to share data, where appropriate, is essential to understand the scale of female exploitation within county lines and appropriate interventions.

The percentage of females seen within county line data has not changed over the last 2 years at 13% of all people identified. Around 9% of all juveniles reported are female.

In year 1 it was noted that 5% of females had a CSAE marker which rose to 8.6% in period 2. Although this is a considerable increase we cannot distinguish clearly between the victim and suspect/offender role in every case and there are a small amount of females which have been clearly identified as the suspect/offender.

The majority of females are reported in a ‘workforce’ role, however there are a small amount (less than 5%) reported within a ‘management role’ including at middle market level and one female has been identified as the money launderer for the line.

5.5. Section 45 and National Referral Mechanism (NRM)

The Section 45 defence provides a defence in law to anyone who has committed a criminal act whilst being a victim of slavery, trafficking or exploitation (with the exception of exempt offences listed in Write in full Schedule 4 Modern Slavery Act 2015). This defence has created debate in the courts in county lines cases particularly because drug offences are not included in the list of exempt offences.

The crux of the debate rests on the balance of protecting victims of slavery and trafficking versus the potential misuse of a protective mechanism which defendants can try and use to their advantage.

An independent review of the Modern Slavery Act has concluded that the legislation is fit for purpose and should remain. However, challenges are still seen in county lines investigations.

Best practise relating to the Section 45 defence is for investigators to remain alive to it, considering all material in an investigation. Investigators must ensure that if the investigation strategy determines that a defendant has wilfully committed an offence, and therefore the Section 45 defence should not apply, police must ensure they conduct all relevant enquires, at the earliest opportunity to ensure a robust rebuttal of the defence can be made if necessary.

However, if any evidence comes to light that identifies that the suspect is in fact a victim of trafficking and their offending is linked to this fact, they must be treated as such, submit a NRM referral and proceed to investigate the slavery and trafficking offences.

Investigators should maintain a fluid mind-set in relation to someone's involvement in county lines related offences from the outset, to ensure either outcome is dealt with most effectively, by gathering all the relevant information from as many sources as possible.

The NRM is another significant factor to consider in the criminal proceedings of anyone raising a Section 45 defence, or the prosecution of an offender who has trafficked and exploited vulnerable people in the course of their offending. DPP v M (as outlined below) has stated that the NRM is admissible and is expert evidence. It also states that a positive conclusive grounds NRM decision, along with any further evidence of exploitation within the evidence before the court, is sufficient to discharge the evidential burden on the defendant of raising the Section 45 defence.

The best method to ensure the most effective and well-informed outcome of an NRM decision is to ensure the NRM submission is completed on a multi-agency basis. The engagement of all relevant agencies is key and gives the NRM decision maker all the facts of the case to be determined.

The NLCRC, NCA and Modern Slavery Organised Immigration Crime Unit (NPCC) have jointly developed training on the Section 45 defence to equip investigators with all relevant knowledge surrounding it. The training includes county line investigations, but it also captures the wider modern slavery offending methods such as forced labour. This was launched at the NCLCC Safeguarding Conference in March 2021.

Relevant case law includes:-

- R v Joseph 2017
- R v KWA 2018
- R v DS 2019
- DPP v M (2020)
DPP v M (2020)

This stated case centres on the admissibility of the National Referral Mechanism decision within court proceedings. The commission of an offence needs to be a direct consequence of trafficking for the purposes of exploitation. The judgement found that the evidence presented from the SCA decision (a 5 page document), the evidence of the police officers and the admitted facts was sufficient to satisfy the evidential burden and M was acquitted.

Upon appeal it was argued by the DPP that the SCA decision was inadmissible. It was non-expert opinion evidence and was hearsay. The decision was the product of a review of extraneous material by a Home Office employee who was not an expert. In summary the core submission of the Appellant is that the SCA decision is non-expert opinion evidence and whether a person is a victim of exploitation is a question of fact.

This appeal was stayed and both Court of Appeal Judges agreed that the information presented to the District Judge during the trial was admissible and that the statutory defence of Section 45 had not been disproved by the CPS.

The CPS are appealing this ruling at the Supreme Court.

6. Violence

Within county lines there are recorded Organised Crime Groups, Drugs Networks, Familial Groups, Peer groups and Urban Street Gangs. We must look at and be open to, all types of network or group working in this space. The interaction between these groups often leads to the eruption of violence for many reasons including arguing over territory or drug markets, robbery of cash or product or control of children working on the county line.

The fear of violence is often cited as a reason for carrying weapons, this cycle has devastating consequences. Within the next reporting period better understanding of these networks and the people within those groups operating within county lines will be key to understanding and analysing the linked violence.

6.1. Most Serious Violence Linked to County Lines

The chart on the right illustrates analysis provided by NW ROCU highlighting a breakdown of violence linked to county lines between Nov 19 and Oct 20. This is beneficial and should be replicated by all regions to enhance understanding of the links between violence and county lines and impact of policing activity.

There have been 23 incidents of most serious violence linked to county lines between 1st November 2019 and 31st October 2020 in NW ROCU region. It’s a reduction on the year before when there were 43 incidents of most serious violence. Covid and the inception of the Merseyside county lines pilot are believed to be responsible for the reduction. There was a rise in violence as lockdown eased and a clear reduction as the taskforce began operating.

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Nov 19 - Oct 2020 Violent Offences Connected to County Lines in NW Region

Over half of all incidents happened in Merseyside and Lancashire. The analyst in the ROCU searched through violent crimes to identify those with a clear link to county lines offending and recorded them separately for further analysis.

RECOMMENDATIONS

- NCLCC to work with all forces to record outcomes of modern slavery cases in order to identify successful methodologies and circulate best practise.
- Investigators must obtain all relevant information and intelligence from any other police force and partner agency involved with that person to fully understand and present the extent of the exploitation.

“There are 4,772 known OCGs operating within the UK, a quarter of which are estimated to be involved in violent criminal activity.”  
(NCA SA 2020)

There is a national geographical footprint of OCGs linked to county lines. 585 unique OCG ID’s (12.5% of all known OCGs) are linked to 955 unique individuals identified within county lines. 43.1% of Unique OCG IDs have two or more individuals. All the county line OCGs contain nominals also linked to violent criminality.

Nationally Organised Crime Groups are identified and mapped. These are the networks involved in most serious and organised crime. The national Organised Crime Group Matrix on which they are recorded provides a unique ID number. There is cross over with street gangs and familial organisations, some are recorded on the system. However we know that most county line drug networks or urban street gangs will not be identified on the OCGM.

The North West Region own the majority of OCGs where there are mapped individuals linked to the county lines, followed by Yorkshire and the Humber (YATH) and the MPS. The adjacent map shows the distribution by region.

However if we look at the county lines OCGs by the regions they have been reported as working in, we can see the majority impact on forces within the same Region. For example a Merseyside OCG running lines to Cheshire. Both the importer and exporter areas are in the same NW Region.

The small cohort of the top 12 County Line OCGs have a disproportionately large footprint and will be examined in the next reporting period.

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Table of County Line OCGs by Number of Regions they Impact Upon.

As described in the table about regional impact, there are a small number of OCGs that have been reported as active in a number of regions. The top OCG based in South Wales has a footprint in 7 Regions.

There are 5 OCGs who impact on 6 Regions, one based in the MPS and four from South West ROCU.

The 6 OCGs as highlighted in the diagram have a footprint in every region in the country between them. Every group is known for county lines and violence.

The MPS own the top two OCGs that are linked to the most individuals, which fits with them being the largest exporter of county lines. The first, an urban street gang from West London, has 19 individuals identified since the inception of the NCLCC in 2018 up to September 2020.

This OCG has a geographical impact on 3 regions across 6 police forces and are involved in drugs supply, violent crime, firearms offending and murder.

The second, an urban street gang from South London is linked to 17 individuals identified within the same period. They are operating across 4 regions (East Midlands, Eastern, South Eastern regions and MPS) and have a footprint across the BTP network. The OCG is linked to firearms, drug activity and violent crime.
6.3. County Lines and Homicide

County lines involve face to face contact between users and dealers. Further up the drugs tier model those organisers benefitting from the “deal” do not have to meet. At street level, young children or vulnerable adults are left holding quantities of cash and/or drugs, either in a known premises, such as a trap or crack house or out in the street. This makes them prime targets for robbery or disputes which lead to more chaotic acts of violence.

The data currently available is for homicide linked to all drug use and offending, not county lines specifically. The proportion of homicides from ONS data that have involved drug users or dealers, or have been related to drugs, has increased over the last decade from 36% in the year ending March 2009 to 47% in the year ending March 2019.

In the last year (up to end March 2019), there were 313 murders that involved drug users or dealers or were in some way drug-related, which was 47% of all homicides across the country. A quarter of homicide victims were known to be drug users, and 13% were known to be drug dealers. These proportions were even higher among suspects: 42% were known to be drug users and around a quarter (24%) were known to be drug dealers.

The drug users they are supplying are often addicted which impairs rational thinking. This results in two vulnerable cohorts, both statistically at risk of being concerned in serious violence or homicide being forced together in the same place.

RECOMMENDATIONS

- All county lines ROCU analysts to record incidences of most serious violence relating to county lines.
- The identification of county lines drug networks is key. Teams targeting county lines should work with local community officers to identify and record the activity of these networks.
- NCLCC to continue working with Homicide and Violence Reduction Teams to enhance data collection and intelligence to help reduce homicide and most serious violence.

7. Illicit Finance

The NCLCC Financial Team provide support to ROCU’s, Forces and NCA on middle market investigations with links to county lines. The team provide specialist financial investigation advice including strategies in order to maximise opportunities for improving our understanding of the illicit finance flows within the middle market as well as identifying tactical and intelligence gathering opportunities.

The data currently available is for homicide linked to all drug use and offending, not county lines specifically. The proportion of homicides from ONS data that have involved drug users or dealers, or have been related to drugs, has increased over the last decade from 36% in the year ending March 2009 to 47% in the year ending March 2019.

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The drug users they are supplying are often addicted which impairs rational thinking. This results in two vulnerable cohorts, both statistically at risk of being concerned in serious violence or homicide being forced together in the same place.

The team work in conjunction with the UKFIU, National Economic Crime Centre and other stakeholders to identify opportunities for tactical opportunities as well as building knowledge.

Working closely with the National Economic Crime Centre (NECC) the Financial Team have established a public private sector working group which gamers expert knowledge from the banking industry alongside our own financial experts to identify gaps in our understanding and where there are opportunities to identify operational opportunities, gather intelligence and disrupt activity.

The Financial Team are working closely with key partners to help improve our understanding of how money is moved through the middle market. These include Project Brimfully which is being run by the NECC and looks at the use of under 18-year-olds as money mules and Project Demiking looking at the use of cryptocurrency.

CASE STUDY - Operation E

A proactive investigation into the importation of Class A drugs and money laundering. The Financial Team prepared full financial profiles, identifying significant bank accounts with evidence of cash laundering which were passed to the case team for review, support is ongoing.

CASE STUDY - Operation G

Investigation focused on dismantling the supply of crack cocaine and heroin being sold in the Gateshead and Newcastle areas of Northumbria by a county line operating out of Merseyside and Cheshire with several lines throughout the UK, including Wales and Scotland.

The NCLCC Financial Team were engaged in preparation for the strike day, executing warrants and the seizure of high value watches, sunglasses, shoes, cash and significant further bank accounts/financial documentation.

Following the arrest phase the Financial Team continued to support the investigation with international enquiries to identify further assets as well as assisting to expedite the valuations of high value watches recovered during the arrest phase to support money laundering charges, restraint, and eventually confiscation proceedings.
Project Brimfully is developing a 4P response to the risks posed by under-18 money mules. National intelligence on money mule offences indicates they are concentrated in comparable geographic regions to county line drug dealing; namely local authorities with high levels of child poverty, based primarily in cities including London, Birmingham and Manchester.

Further work is ongoing to identify mule recruitment pathways and to identify priority vulnerabilities for disruption.

Covid has had an impact on the spending patterns nationally. The county lines business model relies on cash - small denomination notes. So there will be changes for the line holders and immediately above as the spending of large sums of cash has been difficult for nearly a year. We await to see if there is an impact on the investigative opportunities as the banking system is more extensively used. Alternatively we may find larger sums of cash in the coming months as the opportunity to spend in shops, clubs and on lifestyle has been reduced.

Project Demiking is scoping the use of cryptocurrency across SOC, including county lines. The project also looks at alternative payment methods which is particularly relevant in the context of the pandemic and the potential move away from cash based transactions.

The team are currently supporting 20 pieces of work across NPCC and NCA.

8. Upstream.

Over the past 12 months the End to End Drug Tiers Model has been developed collaboratively by the NCA and NCLCC. The model demonstrates the connectivity between upstream operations and local drug use in UK communities. This is far wider than county lines and documents the path of drugs from international importation into the country and the distribution levels down to street level.

The model was hypothesised as an extrapolation of the three tier National Intelligence Model and is intended to recognise the increasing complexity of SOC and the intricacies of commodity supply routes into the UK.

A total of 9 case studies have been completed which demonstrate the connectivity between the international production of Class A drugs and county lines.

A dedicated NCA county lines team was established in October 2020 with responsibility for developing intelligence at tier 4 and above where there is a link downstream to county lines.

**CASE STUDY - Scouse Porky Line**

In late 2019 Merseyside Police conducted activity to disrupt the ‘Scouse Porky’ county line, an active line running from Liverpool to Bournemouth. The action resulted in the conviction of six persons operating at tiers 1 and 2 of the End to End Drug Tiers Model.

The subsequent strategic review conducted by the NCA provided intelligence identifying the middle market (tier 3) nominal who was the supplier into the line. This subject was subsequently identified as the user of an encro device captured under Operation Venetic. Further analysis identified several high profile nominals involved in the importation, production and onward supply in line with tiers 3 to 7 of the End to End Drug Tiers Model.

Analysis of case studies completed so far demonstrates that operations targeting tiers 5 to 7 present significant opportunity for high disruptive impact.

The NCA’s work internationally has demonstrable links downstream into county lines and there are currently several upstream drug investigations where there is a known link down into county lines. Operation Venetic has enabled the NCA to map data which further evidences the connectivity between county line nominals and upstream subjects. The Operation Venetic data analysis has reinforced this connectivity and proven it to a much greater extent, evidenced by at least 40 nominals being intrinsically linked to county lines and upstream importation.

The NCA are developing intelligence around these nominals to further evidence the link between county lines and international supply.
CASE STUDY - Operation J

Operation J is an investigation into large scale drug importations into the UK by a North West based OCG. A number of significant drug seizures have been linked to the OCG and a proactive investigation into the group is ongoing by the NCA.

In June 2020 an opportunity arose to identify the downstream criminals to which the OCG were supplying. Both parties were stopped and arrested for being concerned in the supply of Class A drugs. One male was in possession of approximately £120,000 and the other was in possession of approximately 2.5kg of heroin and 1.2 kg of cocaine. It is estimated that the street value is £350,000. The male in possession of drugs is known to be involved in county lines.

RECOMMENDATIONS

- Tiers 5 – 7: NCA focus activity at these tiers to choke supply into county lines.
- Tier 4: Through joint NPCC/NCA collaboration; NCA county lines team develop intelligence to target this tier for dissemination to ROCU’s or tasking within the NCA as appropriate.
- Tier 3: Through joint NPCC/NCA collaboration; NCLCC develop intelligence packages targeting the middle market tier 3 for dissemination out to ROCU’s.


The NCLCC is funded by the Home Office and was set up in September 2018. The structure is set up as Gold, Silver and Bronze and follows a 4P approach. The NCA lead on finance and upstream, whilst the NPCC lead on all policing matters related to the 4P’s, with the thematic areas shown below in the diagram. There are a network of Co-ordinators and analysts across the ROCU’s and SME staff leading on each of the 4P areas.

For the first year it designed processes to help capture data, investigate and report back on the national picture, and begin co-ordination of all county lines related activity through regional SPOCS. This work continues to be delivered through the Bronze Analysis and Bronze Pursue Leads.

Upon continual development of the national picture of the threat, risk and harm generated by county lines, the NCLCC seeks to further advance progress where there are critical intelligence and investigative gaps through the use of SME’s embedded within it. This is delivered via the Bronze Safeguarding Lead. Upon further funding in 2020, the NCLCC developed specific teams to ensure key activity was driven consistently to target offenders and protect victims and this included the National Finance Teams (see Sec.7 Finance) and is run under the Bronze NCA Lead, and a National Orders Team (see below) which sits under Bronze Safeguarding.

The NCLCC provide the ROCU’s a single reference point of contact for intelligence requests and dissemination. They assist with development and deconfliction of lines. Reports are collated together and disseminated back to the ROCU’s to enhance the intelligence picture on their county lines.

These dissemination packages also include any crossovers of people between forces. Where children are identified this forms part of the “safeguarding cycle” which ensures forces have any relevant intelligence, as well as opportunities to further develop it to ensure a robust safeguarding response. The NCLCC Bronze analytical team also utilise the national dataset and produce a quarterly threat assessment, national performance framework, monthly tactical assessment and dashboard, as well other local reports and trends for forces and regions.
9.1. Training and Relationships

The NCLCC’s key successes are formed through building and establishing relationships. The engagement with other NPCC portfolios, partners, government departments, Non Governmental Organisation (NGO’s) as well as colleagues within policing is vital. These relationships enable the development of best practise, policy, operational activity and training to take place. This is fundamental to the set-up of the NCLCC.

The NCLCC has designed and delivered a range of training courses, seminars, webinars and material. This includes the Tackling County Lines: A Proactive Safeguarding Approach 2 day conference (delivered on 23rd and 24th March 2021), cuckooing guidance and standardised best practise supported by webinars as well as Section 45 and NRM guidance (as mentioned in sec 5). The NCLCC has a Knowledge Hub page with a wealth of materials available, all presentations from the conference will be uploaded to Knowledge Hub for ongoing use.

Hydra training courses have been designed to train those involved in county lines investigations, next year the training will be offered to some partners. All of the co-ordinators have been trained to provide masterclasses across their force area received awareness training from the NCLCC Coordinator in December.

The Orders Team provide a range of training from masterclasses to 1-2-1 support for staff obtaining orders. Videos on NRM (https://youtu.be/nwem6MMu5dc) and Section 45 (https://youtu.be/ThCla_XqnK8) have been uploaded on to YouTube and are publicly available for wider use.

The NCLCC are also developing Authorised Professional Practice (APP) with The College of Policing titled, “Standardising the Approach to County Lines related Exploitation”.

To develop key relationships with partners, the NCLCC have created national portfolio leads for county lines related issues that are recurring problems around the country and we have seen some good progress in intelligence links and partnerships since beginning this work earlier this year. These complement the work of the strategic SME Leads who sit within the “3P” Safeguarding Team.

The NCLCC prisons lead presented at the National County Lines Investigators Conference on a national approach to county lines in partnership with HMPPS. The lead has been working with various parties to help establish a process to improve information sharing between police and prisons nationally around county lines once covid restrictions allow.

9.2. Tactical Assessment

The National Level Tactical Assessment has been developed this year to focus on the safeguarding cycle. Following a framework of identified harm indicators and cross over information, vulnerable children will be identified for action, alongside those who seek to exploit them. The most active networks will be reported on to share these details across the country. The report will be circulated to the ROCU analysts and onwards via Coordinators into forces.

9.3. Orders Team

The NCLCC Orders Team was formed this year. They are providing training, support and guidance on the criminal and civil orders that are of particular use in a county lines context. They utilise the national data as well as local investigations to identify opportunities to develop intelligence profiles on the victims and perpetrators involved in county lines which are disseminated to forces. This activity has resulted in arrests for modern slavery (MS), warrant applications, referrals to specialist crime and Slavery and Trafficking Order applications. This vital work generates a proactive response in highlighting risk and managing it effectively. The ongoing aim being that this type of practise will embed itself into police culture as a way of dealing with exploitation hands on, by identifying and tackling the perpetrators by using preventative legislation.

Additionally the NCLCC Orders Team are ensuring that law enforcement partners are receiving full training and an understanding of orders particularly when offenders are in prison and on license to ensure full compliance with restrictions, maximising use of shared intelligence and risk management.

CASE STUDY - OP Mumble

A mid-2020 prison-led, joint operation with HMPPS NIU teams and partner agencies, including SEROCU and NCLCC, looking into drug conveyance into HMP High Down. The operation identified a number of prisoners who were organising throw overs of contraband. Resulting intelligence led to the interception of a throw over, and the arrest of 3 prisoners and 4 members of the public. Several of those involved had links to county lines, including vulnerable members of the community.

Looking ahead the NCLCC Orders Team has devised a Practitioners guidance which is due to be published in 2021, specifically on the use of slavery and trafficking orders. The guidance is designed to inform investigators and legal departments on how to apply for orders, how to handle sensitive, third party and hearsay material. All of which are prevalent in county lines cases. The guidance has been developed with the legal advice of Hugh Davies QC and Ryan Dowding of 3 Raymond Building Chambers, London.
Glossary

Home Office definition of a County Line:
...a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

County Line Deal Phone - The phone used by county line drug networks to manage their distribution and supply and deal drugs to the end drug user.

Active line - County line deal phone number that is both current and live and is being used by a drug network to supply drugs.

Runner - A person selling and delivering the drugs to the user. The lowest role in the business model and the entry point that many vulnerable or young people are groomed or coerced into joining.

Line Holder - The person in charge of the county line.

Workforce - A general term for a person at the lowest end of the county lines model, engaged in the work. They may be a runner or wrapping the drugs into deal packages. This group are very vulnerable to exploitation and at high risk of threat and harm.

Management - This group are people managing lines or the workforce. It would include the line holders, or facilitators, who for the majority of time help the business model without having to do the face to face drugs deals. It may include trusted people to collect and help clean money, people obtaining vehicles such as hire cars or paying for taxi's or specialist crack “chefs” or recruiters.

Middle Market - This group sit above the Line Holder and supply drugs to the Line. They sit at a higher point in the NCA End to End Drugs model.

DDTRO Drug Dealing Telecommunications Restriction Order - This order is created for disruption on mobile phones used by individuals involved in criminal activity.

STRO Slavery and Trafficking Risk Orders - A STRO can be made by a Court in respect of an individual who has NOT been convicted of a slavery or trafficking offence. The Court must be satisfied that there is a risk that the defendant may commit a slavery or human trafficking offence and that the STRO is necessary to protect against the risk of harm from the defendant committing the offence. STROs enable action to be taken where this is necessary to prevent serious harm to the public notwithstanding the absence of a conviction.

STPO Slavery & Trafficking Prevention Orders - The purpose of the STPO is to prevent slavery and human trafficking offences being committed by someone who has already committed such offences. They can be applied for on conviction of such an offence (section 14) or a separate application made to the courts at any time in respect of an individual who has been convicted or cautioned (or subject to a similar finding) for a slavery or trafficking offence in the UK or been convicted or cautioned for an equivalent offence abroad.

Plugging - A term used to describe the internal secretion of a package of drugs inside a bodily orifice. Drugs are usually concealed within a condom, or similarly effective packaging and placed inside the rectum using lubricant. Vaginal plugging can also occur but is not as commonly seen. The objective of plugging is to transport or conceal drugs without detection. Plugged packages usually contain drugs which are individually wrapped, and quantities can be recovered with 100+ wraps inside. A superintendent's custody extension can detain a person suspected of plugging drugs for an additional period of 92 hours. The court must issue a warrant of further detention for anything thereafter post charge, under Sec 152 of CJA.

Cuckooing - A term used to describe the use of someone's property as a base to deal drugs from, typically seen in the County Lines methodology. As a simile to the behaviour of the cuckoo bird, drug dealers use violence and coercion to occupy the property of someone who is often vulnerable through mental health, domestic circumstances, substance misuse or manipulation. Their property is used as a “base” for that drug dealing gang who want to deal in that particular area. The property is used to cut and store drugs, and despatch drug runners from to perform a deal. As the address can be used for long periods at a time, it is not uncommon to find missing children within these premises. Typically the running of the drug operation is overseen by a “manager” who oversees the “workforce” at this property. The “manager” will be in receipt of phone calls from the “line holder” who will give instructions on the drug deal, quantity/drug type location etc. Notably, the occupier of the cuckoed address can be a victim of violence, coercion and even Modern Slavery, however there can be instances where the drug user is also being paid in drug for the use of their property. Victim hood of cuckoed property occupants is variable and full investigation of the circumstances of that occupier should be carried out by police and partner agencies.