Cutting the head off the snake

Addressing the role technology plays in the county lines model

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About Crest Advisory

We are crime and justice specialists - equal parts research, strategy and communication. From police forces to public inquiries, from tech companies to devolved authorities, we believe all these organisations (and more) have their own part to play in building a safer, more secure society. As the UK's only consultancy with this focus, we are as much of a blend as the crime and justice sector itself.

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Foreword by David Sidwick, Police and Crime Commissioner for Hampshire and Donna Jones, Police and Crime Commissioner for Hampshire and Association of Police and Crime Commissioners Lead for Victims

The law enforcement landscape in relation to tackling County Lines drug dealing has changed dramatically in recent years. From a strategic understanding of the business model and operational behaviour of the gangs who deal drugs under the county lines banner, we have developed a deeper awareness of the situation to the point that UK Policing has established its own detailed and well-resourced response to the challenge. This has yielded a remarkable series of successes against the trade, and the learning obtained from this work is already being used to inform successive operational work on other aspects of the drug trade in the UK.

Key to a deep understanding of the business model associated with county lines drug dealing is the method of communication used by the gangs, both with their customers and with their workforce.

This report, generated with the cooperation of the National County Lines Coordination Centre (NCLCC), several police forces, charities, and youth justice organisations, is the result of hours of painstaking research and an enormous effort by Crest Advisory and Forensic Analytics Ltd., who have contributed significantly to the body of evidence on the subject.

The conclusions, which we wholeheartedly support, recommend greater cooperation between telecoms and social media companies and law enforcement, that the criminal exploitation of children such as in county lines be treated with the same level of importance as child sexual exploitation is currently, and finally that the ability of police forces to deal with digital information quickly and expertly is developed to the point that all investigators have the knowledge and resources to exploit that data.

We are grateful to the many hundreds of professionals whose work has directly and indirectly contributed to the findings in this report.

Introduction

*"[County lines is] 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 druge and money and they will often use coercion, intimidation, violence (including sexual violence) or weapons".* Serious Violence Strategy, 2018[1]

The National Crime Agency published their first intelligence assessment of county lines in 2015[2]. Ever since, there has been a growing interest in county lines from the media, public policy and the world of research. Crest Advisory has published research which has contributed to the body of evidence, among other things, on the socio-economic determinants of individual vulnerability to exploitation, shining light on ways to mitigate those risks[3]. This project, however, takes a different approach, by honing in on the specific role played by technology in county lines.

In this report, 'technology' is used to refer to electronic or digital devices or services - predominantly those used for personal communication. By including devices and services in our definition we incorporate both physical hardware such as mobile phones or smartwatches, and software such as applications provided by social media platforms.

Technology plays an ever increasingly important role in our day-to-day lives. Data from the Office for National Statistics (ONS) show that the proportion of adults who use the internet daily has increased from 35 per cent of the UK population in 2006 to 89 per cent in 2020[4]. The nature of this usage has also changed dramatically, with social media increasing in influence significantly over the years. In 2021 TikTok, a social media platform designed for sharing short videos, overtook Google for the first time as the most popular site worldwide.[5]

Just as modern technologies are now an essential aspect of modern society, technology is intrinsic to the county lines model. The mobile phone, or the 'line' it facilitates, enables communications between those running the lines, those distributing the drugs, and those buying and using the drugs. Current approaches to disrupting county lines rely heavily on mobile communications technology (e.g. cell site analysis, or digital forensics gained from burner phones, personal smart phones or other digital devices). However, the role of technology as an enabler of child criminal exploitation *(CCE)* is both under-represented and poorly understood in published research and literature. The Government has announced an intention to *"cut the head off the snake"[6]* of county lines. To understand what is required to do this, it is necessary to explore the dynamics of the

[1] Home Office – Serious Violence Strategy, April 2018
[2] Document title 1 (nationalcrimeagency.gov.uk)
[3] County Lines and Looked After Children
[4] Internet access - households and individuals - Office for National Statistics (ons.gov.uk)
[5] TikTok overtakes Google to become most popular site on the planet | The Independent
[6] https://news.sky.com/video/home-secretary-to-cut-head-off-snake-of-drug-gangs-

country lines model, as well as examining its weaknesses. There is an acute need to better understand and monitor technological evolutions within county lines and analyse their implications for CCE. Only by understanding and responding to the role of technology can the Government and law enforcement leaders produce an effective national plan to *'cut the head off the snake'* of county lines.

Recent public policy developments have put the role technology plays in enabling crime in sharp focus. Social media and online platforms have seen perhaps the most dramatic rise in interest. Even though, at the time this report is being drafted, the Online Safety Bill has been put on hold, much ink has been spilled on its value, its potential impact on privacy and what should be included in such legislation. High profile cases, such as the events leading to the 6th January attack on the United States Capitol in 2021, have shown the potential harm that can be caused by online communication. More generally, as we become more and more dependent on tech for all aspects of our lives, it is crucial that law enforcement keeps pace with its development with regards to crime.

Our approach

This report is a result of exploring the past, current and potential future role technology plays in county lines, based upon desk research and interviews with gang members, police officers and tech experts. Prior to the report, Crest published two 'long reads': one focused on exploring the past role of technology in county lines[7], the other identifying key trends in the future evolution of technology and how that may affect county lines[8]. This report brings together insights from both long reads with new research, to highlight the impact of technological evolution on the county lines model. In this way, Crest and Forensic Analytics have brought forward a suite of evidence-informed recommendations for a framework of collaboration between law enforcement and other agencies involved in the disruption of county lines.

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[7] [Running out of credit: Mobile phone tech and the birth of county lines (crestadvisory.com)](crestadvisory.com)
[8] [Five things you need to know about new tech and county lines (crestadvisory.com)](crestadvisory.com)

Methods

The key objective of this project is to understand the role played by technology in the criminal exploitation of children involved in county lines and to consider how the nature of this exploitation might change in the near future. It was essential therefore to determine the technologies which have played a significant role in the development of county lines, and the way in which organised crime groups (OCGs) and gangs have made use of them to adapt their business models and respond to police tactics. This report also examines the law enforcement response to county lines and considers the potential impact of emerging technologies on the ability of police forces to detect and intercept drug lines.

Our research methods were selected to provide a wide breadth of understanding of both county lines and technological developments. We interviewed stakeholders with differing areas of expertise, including those in law enforcement, technology experts and young people with personal experience of being involved in county lines. We also used a variety of engagement methods, including one-on-one interviews, group interviews, a workshop and a roundtable. This enabled us to both delve deeply into the expertise of individual stakeholders and to benefit from ideas sparked in discussion with other experts.

By combining the spheres of county lines and technology, we have formulated well-evidenced and actionable recommendations for law enforcement, policymakers and technology companies on how they might work more effectively to prevent the high levels of harm currently seen.

Phase 1: The rise of burners

This project was divided into two main phases. The first phase concentrated on the evolution of county lines from its conception as a model of drug dealing and child exploitation to the present day. Alongside this we examined the changes in personal communications technology over the last few decades to assess how county lines may have adapted as a result of technological developments.

Our approach:

- **Literature and evidence review**
- **"King for a Day" workshop:** 18 stakeholders from law enforcement backgrounds took part in an afternoon workshop to discuss and share ideas about barriers to tackling county lines.
- **Interviews with nine current or former gang members** who have personal experience of being involved in county lines.
- **Interviews with two expert witnesses**
- **Interviews with six members of law enforcement**

The second phase of this project focused on how county lines might continue to evolve in the near future. Through interviews with technology stakeholders and reviewing available literature we were able to gather predictions about upcoming technology developments. These were then discussed with experts in law enforcement to assess what impact these developments could have on the operation of county lines.

Our approach:

- **'WeCops' event on Twitter:** an hour long discussion with stakeholders hosted by the 'WeCops' platform resulting in 161 tweets sharing ideas regarding the law enforcement response to county lines.
- **Market scoping:** a review of emerging trends in technology, seeking to identify upcoming market trends.
- **Interviews with four experts in the technology industry:** we would have preferred to interview a higher number of stakeholders in this area, however we were limited by a lack of willingness on the part of stakeholders to engage with our research. Although this did pose a challenge to the project, the high value of the interviews we did complete with technology experts means we do not feel the overall quality of this project has been affected.
- **Interviews with twelve experts in law enforcement**
- **Roundtable event with seven participants** to test our findings and hypotheses.

Executive summary

Key findings

- Mobile communications technology has been essential to the 'how' of county lines as an enabler essential for both grooming and exploiting children and selling drugs to users
- Current understanding of county lines may be limited. The picture appears far more diverse than it is commonly presented.
- Technology is already used to conceal county lines activity. In the future it may be possible to further obscure the identity of those responsible, even when county lines activity is uncovered.
- Neither law enforcement or the technology sector can solve these problems themselves. Both sides must contribute to avoid repeating past mistakes.
- Tech companies appear to under-estimate the harm is caused by county lines and do not respond to police requests related to county lines with the level of urgency or concern they show about sexual exploitation.

Recommendations

Reframing the debate

- County lines should be framed in the context of child criminal exploitation (CCE) rather than drug dealing.
- A statutory definition of child criminal exploitation should be included in legislation.
- Communications companies should respond to law enforcement data requests about county lines in the same way as they do with requests relating to child sexual expoitation.

Building the right infrastructure

- Create a clear legal framework for sharing knowledge and data between the technology sector and law enforcement, limiting exchanges to what is necessary and appropriate
- Pilot the use of machine-learning techniques in law enforcement to make the best and most efficient use of data
- Review procurement routes to avoid blocking small innovative technology companies from entering the market and proposing new solutions.

Getting the upper hand in the technology arms race

- 'Hands-on' training should be given to law enforcement officers to teach them how to use digital investigatory methods
- Law enforcement should make greater efforts to publicise their technological capabilities to act as a deterrent.
- Funding should be provided to set up specialist law enforcement teams with digital expertise, with costs and benefits of the investment monitored over time.
- Single Points of Contact (or similar positions) should be set up to liaise with mobile and communications technology companies.

1. Technology has fundamentally shaped the county lines model

To determine how law enforcement should tackle the use of technology in county lines, we need to understand where we are now and how we got here. In this chapter we examine the evolution of county lines through the lens of technology. Whilst other reports into the county lines phenomena have focused on the reasons why county lines developed, in this chapter we focus on the 'how' rather than the 'why'. We argue that the *'how'* of the development of county lines is found in the use of technology. Understanding the way in which county lines operate and how line operators adapt their methods is essential to anticipating how county lines will continue to evolve.

We also argue that county lines is a more diverse drug dealing model than previously described. It's important for law enforcement agencies and others involved in tackling county lines to be aware of that to help them develop a clear intelligence picture.

Mobile communications technology: the original "how" of county lines

The use of communications technology has always been a key component of county lines drug dealing. Before mobile phones became available to the wider public in the 1990s, drug dealing usually took place via open drug markets where customers could approach dealers in public places and purchase drugs without prior interaction between them. This model involved a high level of risk for the dealers, as they were vulnerable to being intercepted by law enforcement or robbed. Once mobile phones became available and largely affordable, dealing increasingly moved to closed markets where the majority of communication occurred via messages, and anyone wanting to purchase drugs had to first gain access to the phone number.

> *"It's far better if you can build an established relationship with your customers and do it in a closed market where the law enforcement- they've got a much more difficult job to try and detect your activities. Since mobile phones became available, and then most people started carrying them, that's when we saw the shift to mobile telephones."* - Law enforcement expert

We can't say for sure when county lines began but those who view it as a newer model of drug dealing date its origins to between 2015 and 2017. Initially, the key characteristic seemed to be the use of children and young people to transport drugs from towns and cities to rural and coastal areas. Other common features included taking over accommodation belonging to vulnerable individuals, often drug addicts, as a base - a practice known as "cuckooing".

There are various factors that might have prompted the development of county lines drug dealing. One theory advanced by a law enforcement expert is that a lack of funding for drug squads allowed dealing gangs in urban areas to grow to the point of market saturation, making expansion into other areas the only option for further growth.

> *"What they had to do was find new customers. So what they'd do was, you know, let's go country, set up a county line. [...] They went out scouting various towns and cities, usually they will be university towns, or the big towns near train stations- easy to get to."*- Law enforcement expert

Another theory put forward by a law enforcement expert is that county lines developed as a result of the relocation of people involved in drug dealing from urban centres into the surrounding areas, where they may have then sought to continue their businesses.

> *"We've got persons that have come up in that drug dealer environment or that criminal environment, being placed into a surrounding county, effectively providing a business opportunity for those gangs that are operating to branch out"* - Law enforcement expert

Although the 'why' of county lines is contested, the 'how' is far clearer. Mobile phones provided an instant means of communication perceived to be more secure than face-to-face interaction. Without them, it would have been far more difficult for senior members to direct and control runners travelling to other locations. It is quite possible that county lines as we know it would never have developed without mobile phone technology.

An evolution of the model, through technology

It is clear from speaking to experts with vast experience in county lines that there are a number of models, enabled by a variety of communications technologies. The greatest differences might be seen between lines in different areas, but there will also be differences between lines operating out of the same cities.

> *"I think the term county lines is confusing if I'm honest, because a London-based county line will operate differently to West Mids or Merseyside-based group."* - Law enforcement expert

Perhaps the most significant change in understanding county lines has been a recognition of the 'franchise' model. While the origin of the term 'county lines' may well have roots in the idea that drugs and young people were crossing county borders, it appears that this is no longer a defining feature. In the franchise model, rather than recruiting young people from an urban area and using them to transport drugs to the dealing area, lines recruit local young people from the dealing area to deal drugs.

> *"There's no distance involved in county lines and how that's evolved now, as long as you've got the movement, and the exploitation associated with that commodity*

> *[...] and that might be over a mile or might be 100 miles, but the methodology still stays the same."* - Law enforcement expert

According to experts, the franchise model probably evolved due to increased awareness among law enforcement of county lines, particularly around young people travelling alone on national rail services. Recruiting young people who live locally avoids the need for them to travel far away from home, meaning they are less likely to be reported missing.

We were also told by young people involved in county lines dealing, that, particularly in areas with a lack of ethnic diversity, using local people as dealers draws far less attention than bringing in young people from other areas.

> *"It makes more sense for you to find the youth that lived in that city that they see every day, not [a] random new guy. Everyone knows him. It's not unusual for him to be out and about."* - Young person involved in county lines

A move to a franchise model might also have been due to a higher-level strategy of attempting to disguise a county line as local drug dealing. One law enforcement expert observed that county lines are prioritised over local lines, making it a tactical move to try and pass as a local line.

Regardless of the motivations behind the franchise model, the existence of mobile phones and of encrypted messaging apps will certainly have been important facilitators. The franchise model involves the recruitment and control of young people in the dealing area, meaning there is likely to be far less face-to-face contact between them and senior members of the gangs. Communication technology therefore becomes even more important.

A second significant change in understanding county lines is the possibility that it involves dealing drugs other than crack cocaine and heroin. Official definitions of county lines have never precluded the inclusion of other drugs, for example the NCA's 2017 definition of county lines referred to the supply of 'drugs (*primarily* heroin and crack cocaine)'.[9] Despite that, the common understanding of county lines has largely revolved around the sale of "light and dark".

This image of county lines may have been the result of a 'feedback loop' produced when law enforcement officers understand county lines to be the sale of crack and heroin, and therefore only look for crack and heroin dealing when tackling county lines. Law enforcement experts also noted that law enforcement are more likely to focus on crack and heroin dealing as the use of these drugs is more linked to other types of crime.

> *"We won't necessarily concentrate on a cocaine line as much. Because it's a social drug that, yes, there's nighttime economy, criminality of pub fights, and all*

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[9] [file (nationalcrimeagency.gov.uk)](nationalcrimeagency.gov.uk)

> *of that sort of stuff. But actually, in terms of the volume of crime that it then is affiliated to, isn't there."* - Member of law enforcement

Although the core county lines products are crack and heroin, sold to daily users, the definition can be expanded to include the sale of other types of drugs used for recreational purposes. Young people involved in county lines were clear that it could involve a variety of different drugs.

An expansion of the county lines model into the sale of more recreational drugs could be facilitated only by using recent technological developments such as smartphones and encrypted apps, due to the customer base. One example are county lines which run close to university campuses and diversify their communications media to appeal to students.

> *"If it weren't for the fact that most of these crackheads [sic] are out there on the street, right, it would work like with other drugs like cannabis and molly where you get them through post"* - Young person involved in county lines

Understanding that county lines may include the sale of drugs other than crack and heroin has important implications. The first is the scale of potential growth of the market. According to figures from the Crime Survey for England and Wales (CSEW)[10], from 2015/16 to 2018/19, the proportion of 18-59 year olds reporting use of powder cocaine in the last year rose from 2.2 per cent to 2.9 per cent, and for cannabis it was 6.5 per cent to 7.6 per cent. Over the same time period the use of crack cocaine remained stable at 0.1 per cent of 18-59 year olds. That means that there is the potential for county lines to be operating on a far wider scale than previously imagined.

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[10] United Kingdom drug situation 2019: Focal Point annual report - GOV.UK (www.gov.uk)

Increase in cannabis use from 2015/16 to 2018/19 — 17%

Increase in powder cocaine use from 2015/16 to 2018/19 — 32%
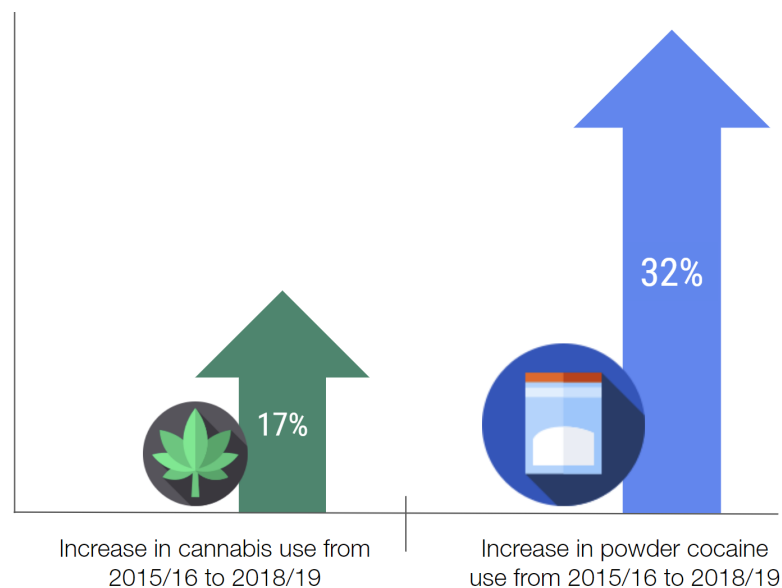
The second implication relates to the use of technology. As we have made clear in previous publications[11], there are conflicting views about the likelihood of a widespread uptake of smartphones among crack and heroin users in the near future. Stakeholders told us how communication with customers of other drugs such as cannabis or party pills, however, is much more likely to occur via smartphones. Law enforcement methods for tackling county lines activity therefore need to expand to include combating the sale of drugs other than crack and heroin using digital channels of communication.

> *"If you're going to run a cannabis line, or cocaine line, you operate a wholly different level of tactics [...] If you're gonna sell ketamine, cocaine, or cannabis bud, that is when you'll see Whatsapp, that is when you'll see Telegram. MDMA pills will be Telegram or moving into the dark web even and the closed groups"* - Member of law enforcement

A third change in how county lines are understood to function relates to variations in roles on a line. Previously, in the majority of cases, the main phone would remain with a more senior member of the line, outside of the dealing area. Contact with customers would go through that phone and the younger gang members would then receive instructions from the line holder about where to go to carry out the sales. Now, on some lines such as those in London, younger gang members will have the handset and communicate with customers directly. That is probably due to increased awareness of police tactics and the use of modern slavery legislation to arrest and prosecute senior gang members.

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[11] Running out of credit: Mobile phone tech and the birth of county lines (crestadvisory.com)

> "We had the line there. Sometimes I'll hold it and I'll take all the calls because I didn't have product on me. I had the phone on me [...] and they'll give me the money." - Young person involved in county lines

As well as younger gang members holding handsets, experts also pointed to a trend of teenagers progressing from being recruited to exploiting others more quickly than before. Experts have seen those groomed to join the line at the age of 12 or 13 then grooming and exploiting others by the age of 15. This swift progression could be the result of the high levels of harm experienced by those at the bottom of the ladder and an urgent desire to move away from that.

We cannot know whether all the 'new' models observed by law enforcement have actually only developed recently or whether law enforcement has only recently become aware of them. For example, it is possible that the franchise model may have been operating in tandem with the cross-border model since the beginning but flew under the radar until recently. One law enforcement expert we spoke to said that apparent changes in the operation of county lines may simply be a reflection of greater understanding on the part of law enforcement: "*so maybe some of it was already there.*"

What we do know is that personal communications technology has developed significantly over the last few decades. Rates of smartphone ownership rose from 17 per cent of the UK population in 2008 to 78 per cent in 2018.[12] Although the first iWatch only came out in 2015, 20 per cent of the UK population was estimated to own a smartwatch in 2018.[13]

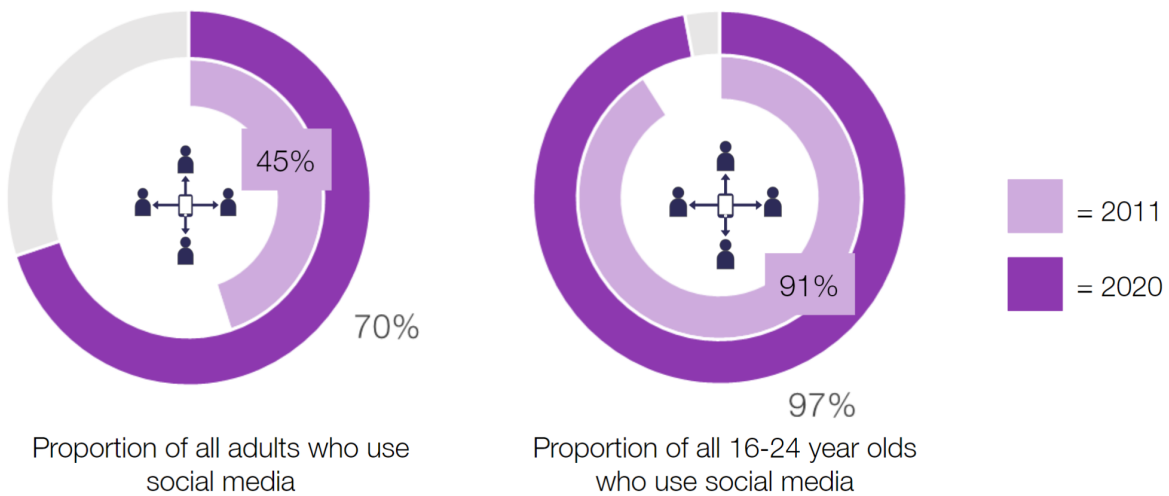Smartphone ownership   Smartwatch ownership
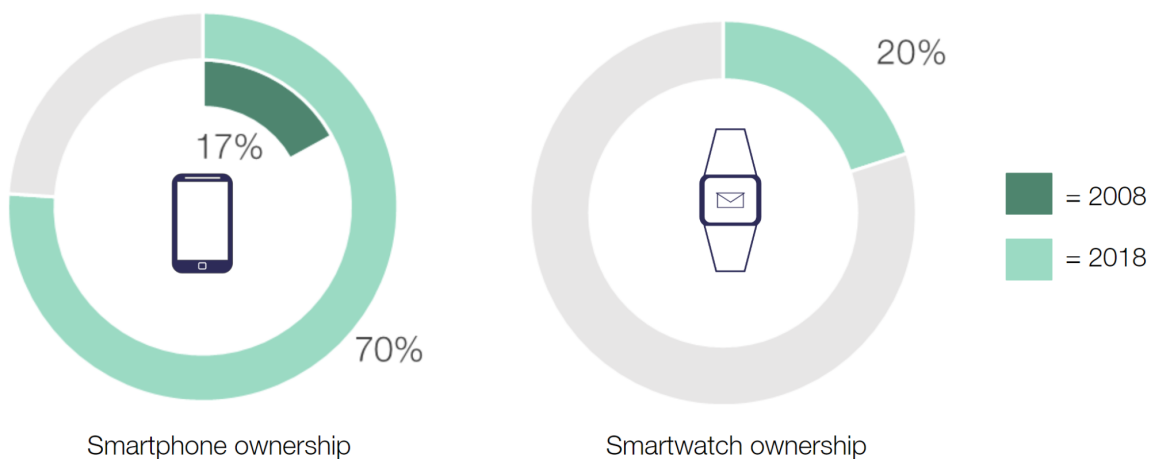
Meanwhile, the proportion of UK adults who had used social media in the last three months increased from 45 per cent in 2011 to 70 per cent in 2020, or 97 per cent for those aged 16 to 24.[14]

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[12] A decade of digital dependency - Ofcom
[13] Ibid
[14] Internet access - households and individuals - Office for National Statistics (ons.gov.uk)

45%

70%

91%

97%

= 2011

= 2020

Proportion of all adults who use
social media

Proportion of all 16-24 year olds
who use social media

Several of the variations observed, such as the use of social media to groom new recruits or using encrypted messaging apps to communicate with others on the line, could only have developed after the technology became available. Some of the new models are dependent on technology, others are facilitated by it - but could have come about in other ways.

Technology: county lines' privacy screen

A key advantage of tech for those involved in county lines is an additional layer of security. Just as drug dealing moved from open markets to closed markets with messages being sent via burner phones to avoid police detection, now encrypted messaging apps are being seen more and more. Law enforcement has already developed techniques to use data from smartphone usage, however the use of encrypted apps does make it more difficult to access incriminating content without obtaining access to the handset.

Another example of technology used by county lines operatives to avoid law enforcement detection are cameras outside their buildings to warn them of police raids. Although the technique may backfire as it may alert law enforcement to suspicious addresses, it does make interceptions more challenging.

> *"People setting up CCTV so they can see the road in case police ever raid them so that they can get out"* - Young person involved in county lines

In future, it is possible that the use of technology by county lines will move beyond obscuring the activity itself from the eyes of law enforcement to removing human involvement as much as possible, making it difficult to identify who is accountable. Examples include using AI technology to groom young people via social media or deploying drone technology to deliver drugs. In both instances, even if the activity is uncovered, the individual(s) behind it could enjoy anonymity. There is a risk that if county lines develops its use of technology to a point where those behind it are

unidentifiable, they will be able to increase their level of operations without fear of consequences, incurring harm to a greater number of people.

It appears that 'county lines' is more broad than previous understandings would suggest. There are, however, two key recurring features consistently identified by the stakeholders for this research. The first is the high level of exploitation involved, particularly of children and young people. Several of the experts we spoke to identified exploitation as the key defining feature of county lines, making it distinct from other drug dealing operations.

> *"It's different forms of exploitation as well. I think county lines does tend to rely much more on younger or more vulnerable people."* - Law enforcement expert

A second distinguishing feature of county lines is the integral use of communications technology. Since the beginning, those involved in a county line have needed to communicate both internally and with customers, using mobile phone technology. Although the use of a burner phone has long been seen as a hallmark of county lines, our research has found that the type of phone used is less important than the fact that a phone is used.

> *"I think it's taken a long time for the police to acknowledge that because they would always say that's just local drug dealing. [...] We've had some battles with the police to say it's not about location it's about the mobile phone."* - Technology expert

What to do about technology

In showcasing the role of technology in county lines, our intention was not to demonise technology or those who produce it. None of the technologies mentioned above was developed to be used for criminal or exploitative purposes. They were each designed to meet the needs or desires of the consumer market and were then co-opted by criminal groups, as one technology expert noted:

> *"There's huge advantages for consumers about the way things work and the way technology is developed. So it's a real conundrum about do you support it? Do you not support it? I guess we've almost got to be agnostic to that fact, and just accept that change is happening."* - Technology expert

While some have been quick to blame 'big tech' for the existence of technology-enabled crimes[15], that is not a helpful approach. Technology companies certainly have an important role to play in

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[15] [Social Media Partly To Blame For Knife Crime Rise, Metropolitan Police Commissioner Says | HuffPost UK News (huffingtonpost.co.uk)](#)
[Hate speech: social media fuels hate crimes, and has an obligation to fix it - CNN](#)
[Social media is glamourising gang violence | UK News | Sky News](#)

reducing the likelihood that their products can be used for harmful purposes, but the approach to tackling these harms must be collaborative rather than punitive.

The need for law enforcement agencies to work together with technology companies does not stem from any inadequacy on the part of law enforcement. As a public service employing more than 250,000 people nationwide[16], contending with limited budgets and a wide range of aims and functions, law enforcement agencies are never going to be able to adapt to technology changes as quickly as either tech companies themselves or county lines gangs. Being able to work together with those who are able to foresee changes and act quickly is therefore essential for law enforcement to continue to tackle county lines through all of its evolutions. We will expand on the recommendation for a joined-up approach in the next chapter.

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[16] Public sector employment - Office for National Statistics (ons.gov.uk)

2. All hands on deck

Who should be involved in tackling county lines? Law enforcement organisations play an important role; among other methods, they use intelligence gained from analysing communications data to identify those who run the lines. Other agencies, such as children's social care (CSC) and youth offending teams (YOTs), are also involved in trying to reduce the exploitation of young people into county lines, by addressing known vulnerabilities and identifying red flags. However, the involvement of the technology industry remains limited.

In this chapter, we discuss the limitations of a law-enforcement-only response, highlighting the cat and mouse dynamics that exist. We explain why technology and communications companies have a unique advantage in becoming involved, in particular due to their data collection and monitoring capabilities. Finally, we outline why this proposed collaboration with law enforcement needs to be supported by a clear direction of travel, to ensure efforts are efficiently focused and aligned across those involved.

Law enforcement cannot win this alone

With such a constant stream of technological innovations, it is hard for law enforcement to keep up. In our first long read[17], we described the cat and mouse dynamics of law enforcement and county lines when it came to technological evolution: if a line was seen to adopt a new method, law enforcement would attempt to adapt to better investigate it, and vice versa.

> *"They've [the police] got the big funds behind it. We're just trying to make sure that we can stay ahead, not even stay ahead, just keep up and keep out of reach. It's like Tom and Jerry you know"* - Young person involved in county lines

While those running the lines learn about police capabilities from the evidence presented against them or others in courts, law enforcement gain an understanding of their capabilities from intelligence gathering, in a tit-for-tat cycle. The example of Encrochat illustrates this well. Encrochat, was, according to the National Crime Agency, *"one of the largest providers of encrypted communications and offered a secure mobile instant messaging service"*[18] as well as easy ways to (even remotely) completely wipe a device if it was compromised. As a result, it became widely regarded as the service of choice for organised crime. However, law enforcement eventually managed to gain access to it and made hundreds of arrests. A side effect was that Encrochat closed down once it became compromised and criminals migrated to another network.

> *"They're evolving, because they're seeing the evidence we're presenting and they're adapting their techniques from that as well."* - Member of law enforcement

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[17] [Running out of credit: Mobile phone tech and the birth of county lines (crestadvisory.com)](crestadvisory.com)
[18] https://www.nationalcrimeagency.gov.uk/news/operation-venetic

There can be a significant difference between what the public and / or criminals perceive law enforcement to be capable of doing, and what their capabilities *actually* are, as the Encrochat example shows. To keep a step ahead, law enforcement will not publicise everything that they are capable of, in the same way that those running the lines would not brag about using a specific encrypted service to avoid detection. For law enforcement to have the upper hand, therefore, it needs to disrupt the cycle of evidence discovery and adaptation from those running the county lines.

One way to do this would be to give law enforcement the means to *monitor* the use of tech by those involved in county lines. The success of the Encrochat investigation was partly because investigators were able to monitor the chats as they were happening, rather than gain access to the content of messages afterwards. Without the ability to monitor the use of technology, and not just investigate it, law enforcement will not be able to get a step ahead of organised crime and disrupt the cycle of exploitation.

> *"We're not proactively monitoring Instagram accounts or looking at, profile, you know, keyword searches... I know the technology is there. As police, we should be proactively monitoring."* - Member of law enforcement

## Private technology companies have a unique advantage

To gain this monitoring ability, it is important for law enforcement and others to consider the private sector not as an adversary, but as a potential partner. The private sector is not only at the forefront of technological evolutions, it has to be innovative and keep one step ahead of everyone else. It has to have the upper hand when it comes to monitoring capabilities and understanding the current technological landscape in order to be successful in a competitive market.

> *"Collecting MAC addresses, [...] you do not need a warrant for that, you know, it's being done all the time. Every supermarket is doing it everywhere, the Wi Fi network is doing it [...] Are they infringing on your privacy? Probably. But is it illegal? Probably not."* - Member of law enforcement

The sector also has existing monitoring capabilities that go far beyond what law enforcement can do. That is particularly clear when looking at cases where law enforcement attempts to get ahead - for example, by developing counter-drone technology - only to find that further innovations from the technology sector render their efforts inefficient at best, useless at worst. The video-sharing app TikTok regularly tracks its users - in order to be competitive. Its revenue is largely made through advertising, which requires a good understanding of user behaviour on the platform, gained through data collection and monitoring. This data collection yields results: in 2021, TikTok generated $4.6 billion in revenue, a 78 per cent increase on the year before[19]. And in just four years

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[19] TikTok Revenue and Usage Statistics (2022) - Business of Apps

since TikTok was launched (after a merger with existing app Musical.ly), it has gone from 85 millions users to nearly 1.5 billion users.[20]

TikTok Annual Revenue

$$ = $100 million

2018   2021

TikTok Annual Users

= 100 million users

2018   2021
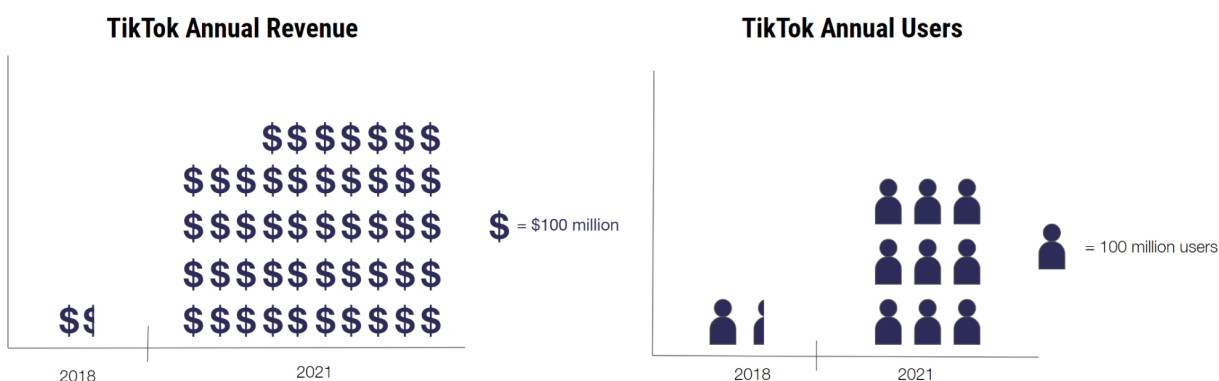
Technology companies already work in partnership with law enforcement, in some cases lending or selling data monitoring and analysing capabilities. That is typically done for investigations where companies offer training or software services to law enforcement to enhance their capabilities, or work directly with law enforcement to access and / or analyse data. For example, mobile network operators are legally required under certain circumstances to cooperate with law enforcement on investigations by providing them with cell-site data from digital devices. However, even where collaboration already exists we were told that the legal framework around it was very limited, which didn't allow for much monitoring to take place. It also doesn't cover online communications services (such as Meta and Tiktok) in the same way. That means that in the same investigation, it may be fairly simple and efficient to gain access to cell-site data for a burner phone, but it could also take months to gain access to the content of WhatsApp messages, if access is allowed at all.

The cybersecurity sector is another example where private companies offer a service to protect businesses from online attacks or frauds. Although they will work with law enforcement to investigate attacks, the monitoring activity is still undertaken by the private company, without direct collaboration from law enforcement.

> "*I think what would actually happen to law enforcement is it would need to have the same capabilities that you have in cybersecurity, which are all about having essentially digital honey traps and things that catch the latest exploits, and then adapt to seeing what threats are out there.*" - Technology expert

Clearly, the partnership needs to go further to get to a better understanding of the role of technology in county lines. At the moment, points of collaboration between the public and private

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[20] Ibid.

sector happen mostly after an incident, when there is an investigation. Even where there is a model for collaboration, it has its limitations. There is also a need for law enforcement and other agencies to access further monitoring information, to be able to prevent exploitation, not just prosecute it.

There is no clear direction of travel

Although there is a case for law enforcement and the technology industry to work together to disrupt county lines, what is lacking is a clear focus on a shared vision. Those working on the collaboration reported that the technology industry felt they couldn't "fight every battle" and were reluctant to get drawn into every issue. Tech firms are being asked to help in many other areas, such as Violence Against Women and Girls and counter terrorism. It suggests that efforts to collaborate with the technology industry risk leading to less engagement from the industry, rather than more.

> *"They have a sense that they're asked to do something special on a whole range of areas, and that they can't fight every battle - there's a degree of reluctance to get drawn into all of these issues"* - Technology expert

We were told that there was no specific interlocutor, or point of contact, to collaborate with the technology industry on county lines. Law enforcement representatives said there was no joined up approach to working with the industry, with certain forces and organisations reaching out to collaborate individually. This pointed to a wider issue: the National County Lines Coordination Centre is coordinating efforts to disrupt county lines, but there was a sense that it may not be receiving the information that it needs to do so.

> *"As much as the National County Lines Coordination Centre are meant to be coordinating everything, it's all reliant on what individuals feedback, so we go to regional calls, and say we've done this and this this month and this line is connected to that, but at the moment none of that is joined up."* - Law enforcement expert

Assuming the industry is willing to engage, it is not only having to work with different stakeholders in law enforcement, it also has no single point of contact for county lines. This needs to change, to maximise the opportunities to collaborate. There needs to be a conscious effort to appeal to the industry in a joined up way, by giving them clear direction of what to focus on.

Collaboration or take-over?

In our engagement sessions for this research, some went as far as suggesting that the efforts to disrupt county lines using technology should be focused directly within the technology industry, almost cutting out law enforcement from the equation. But a model of "privatised law enforcement", with no formal requirements to provide a public service and work towards the public good, has inherent risks. A situation where an industry "self-polices", with technology firms marking their own
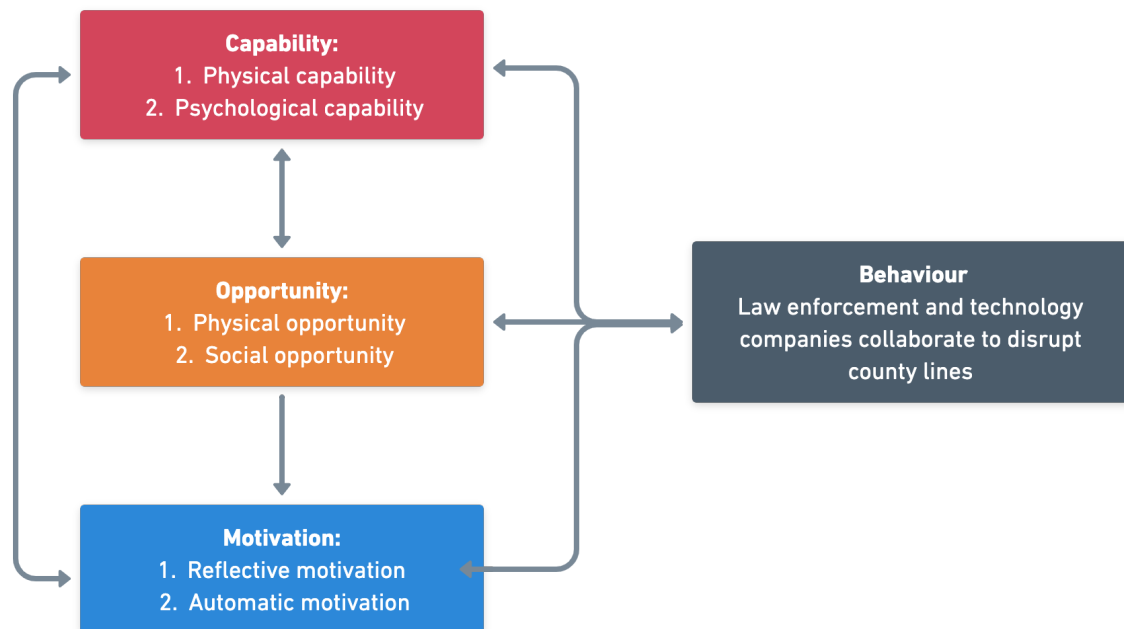
homework, would probably limit the scope of efforts made to disrupt the use of technology in county lines. While the industry may be willing to engage with law enforcement, their intrinsic incentives (their bottom line) do not always align with those of law enforcement agencies or support services. In such a scenario, they may also need to be mandated to be willing to collect and analyse data to disrupt the exploitation of young people into county lines. As such, we would argue that the response to tech-enabled county lines needs to be truly collaborative, where there is transparency between those involved and a formal requirement to provide a public service.

> *"It's a customer trend of 'I want the most secure device you can possibly supply to me' and [tech companies] are saying 'What else can we do in terms of privacy? How can we make our equipment more appealing than somebody else's equipment?'"* - Law enforcement expert

We propose how to reframe the debate for law enforcement and the industry to align on a shared vision, as well as other considerations for how to set up a successful collaboration, in the next chapter.

3. Setting up a successful collaboration

The need for a joined up approach between law enforcement and the technology industry may be clear - but that doesn't mean it will automatically happen. Existing barriers to this collaboration are complex and multifaceted. This chapter aims to provide a way forward by addressing these challenges and proposing clear solutions. The solutions require involvement from additional stakeholders, to reframe the debate around exploitation, build the right infrastructure, and gain forecasting / monitoring capabilities. To structure our thinking, and because we are arguing for a change in the status quo, we have drawn on research into behaviour change. The COM-B (Capability, Opportunity, Motivation, Behaviour) framework was developed to show that for a particular behaviour to occur, the person concerned needs to have the capability and opportunity to engage in the behaviour, and needs to be motivated to behave in such a way[21]. In this situation, the "behaviour" we are aiming to encourage is for stakeholders in law enforcement and the technology industry to collaborate in addressing the role of technology in county lines. We have considered what barriers and potential solutions exist to ensure that they have the capabilities, opportunities and motivation to do so.

Capability:
1. Physical capability
2. Psychological capability

Opportunity:
1. Physical opportunity
2. Social opportunity

Motivation:
1. Reflective motivation
2. Automatic motivation

Behaviour
Law enforcement and technology companies collaborate to disrupt county lines

[22]

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[21] Susan Michie, Maartje M van Stralen, Robert West. (2011). The behaviour change wheel: A new method for characterising and designing behaviour change interventions. Implementation Sci, vol. 6 (1). doi:10.1186/1748-5908-6-42.

[22] Adapted from: Susan Michie, Maartje M van Stralen, Robert West. (2011). The behaviour change wheel: A new method for characterising and designing behaviour change interventions. Implementation Sci, vol. 6 (1). doi:10.1186/1748-5908-6-42.

This chapter will start by answering the motivation challenge, which appears to be most prominent in the public debate: the issue of privacy. We will outline how reframing the debate around exploitation could help answer this challenge for the technology industry, and how such a reframing could also benefit law enforcement efforts.

Then, we will outline how the right opportunities to collaborate could be offered, by building the appropriate legal and technical infrastructure. We also make suggestions for how this could practically be undertaken via the Online Safety Bill or another form of legislation.

Finally, we will explain what capabilities should be enhanced to ensure such a collaboration is able to do more than investigating county lines, moving towards a deterrent model.

1. Reframing the debate around exploitation

Perhaps the most fundamental change that needs to occur is a reframing of understanding about county lines, in order to ensure all parties involved have the necessary *motivation* to tackle the problem. Law enforcement and technology companies both have underlying incentives that can currently hinder their ability to reduce the harms associated with county lines. By refocusing thinking about county lines on the exploitation element, these differing incentives can be aligned to enable a truly collaborative model moving forward.

Quantifying the harms involved

County lines is associated with a wide range of harms. Stakeholders in law enforcement spoke at length of the physical, sexual and mental abuse suffered by children and young people exploited by a line. Some of these harms are inflicted in order to blackmail them to stay working for the line, while others, such as "plugging" (storing drugs in the anal cavity) were directly associated with the operation of county lines.

> *"Any young person who's been involved in this has been [at] extreme risk of violence, of sexual abuse, sexual violence, addiction, [...] and also the mental health side of things as well coming into play with it." - Law enforcement expert*

In some cases, those on the line will not only threaten the young person involved but will escalate and go after their family and friends. This can lead some families to make the decision to relocate in order to escape the threats, which has knock-on effects for the whole family.

Young people involved in county lines also detailed some of the harms they had experienced or were aware of. One young woman described a man she knew who would recruit boys from outside pupil referral units to run drugs for him and then make them 'go missing' if he wasn't happy with them.

> *"If they just even do like one little thing to fuck him up [sic] they go missing [...] He'll send them far far far and they don't come back."* - Young person involved in county lines

Motivation of tech companies: the privacy debate

As private companies, the first and foremost motivation of technology and social media companies is profit. That means keeping consumers happy with their products and services. In the sphere of privacy, conflict then arises between the interests of technology companies in giving consumers what they want, and the interests of law enforcement in having access to data.

> *"I think the privacy of our customers is our number one priority."* - Technology expert

The importance of privacy as a consumer concern should not be underestimated. In January 2021, WhatsApp announced an update to its terms of service which was misinterpreted by some as enabling WhatsApp to read its users' messages. This is believed to have led to millions of users abandoning the platform and turning to other services such as Signal and Telegram, with WhatsApp falling from the eight most downloaded app in the UK at the start of January 2021 to the 23rd most downloaded on the 12th January.[23]

While adequate privacy controls are essential to protect consumers from harms such as fraud, as detailed in Chapter Two of this report, in some cases communications companies are so keen to protect their users' privacy that they inhibit the ability of law enforcement to detect and prevent crime. It is clear that there needs to be a balance between the two competing aims, but also that there is room for this balance to shift slightly more in favour of data-sharing than it currently does.

A recognition of county lines as a highly harmful form of child exploitation could help to shift this balance. According to law enforcement experts, communications companies are currently far more cooperative about sharing data with law enforcement where there is an immediate risk to life or suspicions that children are being sexually exploited than they are in county lines cases. That may be partly because county lines is seen by companies only as a form of drug dealing, rather than a form of exploitation. This suggests that if the harms caused by county lines were viewed in the same light as child sexual exploitation (CSE) and immediate risk to life, communications companies would be more likely to cooperate with law enforcement.

> *"It doesn't matter what jurisdiction they're in, a risk to life, they will usually, Google, Facebook, etc it will get bumped to the top of the list, and we get a very, very good service from them"* - Law enforcement expert

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[23] WhatsApp loses millions of users after terms update | WhatsApp | The Guardian

> *"They do not care that people do drugs on their network. What they do care about is exploitation on the network. And that's where we need to start looking at going more beyond looking beyond the lens of CSE, and looking more into criminal exploitation on the social media networks."* - Law enforcement expert

An example of the impact of recognising potential harm can be found in the case of OnlyFans. Stakeholders in law enforcement described OnlyFans, a content sharing platform commonly associated with online sex work, as being hugely cooperative when it comes to sharing data with law enforcement. This may be because, as a platform hosting sexual content, the potential for exploitation is seen to be high, in a way that is currently not recognised on other platforms. It demonstrates that if companies understand their platforms can be used for exploitation they may be more likely to take proactive steps to prevent it.

Framing data-sharing related to county lines as preventing child exploitation may well make it more palatable to consumers. As long as data-sharing agreements are transparent and clear about how and in what circumstances communications companies would share user data, it is not believed that many consumers would protest at data being shared to tackle county lines in the same way it is already shared to tackle CSE.

> *"More and more apps are out there to say 'Please hand over all your data'. And because there's a nice gimmick at the end of it, we go 'Oh, yeah, I'll do that'. Like there was a face changing app recently. [...] And people were just signing up to it because it made their face change."* - Technology expert

Another example of where companies have adapted what they do to prevent sexual exploitation occured in 2018 when Craigslist, a popular advertisements website, removed the personal ads section from their US site after the Fight Online Sex Trafficking Act was passed by Congress. This was not without controversy, with some saying it removed a platform for sex workers to advertise in a safe environment.[24] Critics also argued that the Bill was so broadly worded that platforms could be held accountable even if they had no idea their service was being used for trafficking. Supporters of the Bill, however, saw it as a step in the right direction to preventing exploitation. It shows that legislation can have an impact on the behaviour of technology companies when they are seen to facilitate harm.[25]

Case Study: Meta's approach to child exploitation

For some companies, including county lines in their understanding of harms to children would not even require a change in the wording of their current policies.

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[24] Craigslist Drops Personal Ads Because of Sex Trafficking Bill - The New York Times (nytimes.com)
[25] Craigslist Shuts Down Personals Section After Congress Passes Bill On Trafficking : The Two-Way : NPR

Meta's current policy on Human Exploitation[26] lists content that may lead to human exploitation, including 'labour exploitation' or 'forced criminal activity (e.g. forced begging, forced drug trafficking') as content that is not permissible to post. The following is also not permissible:

"Content geared towards the:

- *Recruitment of potential victims through force, fraud, coercion, enticement, deception, blackmail or other non-consensual acts.*
- *Facilitation of human exploitation by coordinating, transporting, transferring, harbouring or brokering of victims prior to or during the exploitation.*
- *Exploitation of humans by promoting, depicting or advocating for it."*

Meta also published an article in February 2021 detailing its planned approach to child exploitation.[27]

"Using our apps to harm children is abhorrent and unacceptable. Our industry-leading efforts to combat child exploitation focus on preventing abuse, detecting and reporting content that violates our policies, and working with experts and authorities to keep children safe."

The exploitation associated with county lines clearly fits within the scope of the definitions outlined above. All that is required in this case, therefore, is for Meta to recognise that and to take action to prevent county lines exploitation to the same extent as it does to prevent other forms of child exploitation.

Motivation of law enforcement: drugs or exploitation?

Communications companies are not the only ones who need to reframe how they view county lines. Stakeholders reported that, although this is changing, it is still common for members of law enforcement to focus on the drugs element of county lines, rather than the exploitation and harm. Those who approach county lines in this way will likely see runners as criminals rather than victims and are more likely to seek to confiscate drugs and lock away dealers than cutting off exploitation at the source.

> *"You can see smoke coming out of their ears as they're trying to work out that this kid who's got a knife and some drugs and has threatened to do whatever to his family is actually a victim. And you know, that really does confuse some officers. But it's about winning those hearts and minds and kind of getting that across."* - Law enforcement expert

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[26] Violence and incitement | Transparency Centre (fb.com)
[27] Preventing Child Exploitation on Our Apps | Meta (fb.com)

As well as being a more accurate understanding of the problem, tackling county lines through the lens of exploitation also creates a greater deterrent effect than simply looking at it as drug dealing. Stakeholders observed that convictions for charges such as Modern Slavery or Human Trafficking tend to result in longer sentences than those for possession with intent to supply. Furthermore, a conviction for exploitation could pose a greater risk to an individual's reputation than one for dealing drugs.

One change that could help to consolidate the progress that has been made so far within law enforcement would be to recognise the victimhood of children and young people exploited by county lines in a statutory definition of child criminal exploitation. An amendment to the Modern Slavery Act to include a definition was proposed as part of the Police, Crime and Sentencing Courts Act 2022, however it was dropped from the Act before publication.[28] An official legal definition of child criminal exploitation would consolidate the progress towards recognising the victimhood of children and young people exploited by county lines.

> **Recommendations - reframing the debate**
> ● The framing of county lines should be in the context of child exploitation rather than drug dealing.
> ● A statutory definition of child criminal exploitation should be included in legislation
> ● Communications companies should respond to data requests from law enforcement related to county lines in the same way as they do with requests related to child sexual expoitation.

2. Building the right infrastructure to provide further opportunities to collaborate

While ensuring that the collaboration is focused on limiting exploitation of vulnerable young people is a key step, it will also be important to ensure that there is a system in place to provide clear *opportunities* to collaborate. This includes providing a legal framework for this collaboration which also clearly determines the limits of the collaboration; as well as building processes to ensure that the knowledge and information being shared can be exploited.

Providing a legal framework

At the moment, there isn't a clear legal framework for law enforcement and the private sector to share data and information back and forth beyond the scope of specific investigations. This limits their ability to fully understand the landscape. While police officers and other agencies of the state have a good understanding of patterns of behaviour from investigating previous offences and working with young people, without further information from the private industry, it is hard to get a clear picture of how these behaviours translate into usage of online and communications technologies in real time.

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[28] Amendment 104A to Police, Crime, Sentencing and Courts Act 2022 - Parliamentary Bills - UK Parliament

> *"Everyone jokes about coppers having great gut instincts? Well, they do. [...] But this technology is just adding an extra dimension. It will only help even if it provides 1% of the data that you need, that 1% could be enough to make the difference for you to go down a particular path and investigate that."* - Law enforcement expert

Collaboration between law enforcement and mobile network operators in the past, for example, has enabled the identification of patterns of mobile communications that could indicate "burst messaging" (when a message is sent in bulk to all potential customers), without needing to access the content of the messages. Applying a similar approach to analysing behaviours on social media could unlock additional flags; for example, what patterns could indicate attempts to groom young people? The potential insights that could come with further data-sharing are nearly infinite and could help identify cases where analysing content is necessary.

It is therefore important to work to enable further knowledge and data-sharing between law enforcement and the private sector. The controversial Regulation of Investigatory Powers Act (RIPA [29]) is an example of legislation which enables law enforcement to request mobile communications data from mobile networks in the context of investigations. RIPA is a key reason why mobile networks and law enforcement were able to identify patterns around "burst messaging", mentioned above. However, while it goes some way to providing a framework for collaboration, it has been the source of many criticisms, mainly regarding its potential to create a "surveillance state" by enabling the police to look into anyone without the need for a warrant.[30] By not stipulating a standard for exactly what data can be shared, in what circumstances, and in what format, it not only opens the door to excessive data access, it also creates discrepancies in how operators apply it. As law enforcement representatives explained, this also means that from one network to another, the results of the same request can yield wildly different results.

> *"Under the RIPA, there's a requirement that if there are changes, we keep them [law enforcement] updated about the changes [...] but sometimes we might not hear that on the first day that someone comes up with that idea at the other end of the world. So it might be a while till it comes through."* - Technology expert

We argue that further legislation needs to be implemented, to provide a clear framework for necessary knowledge and data-sharing. It should include all communications technology companies within its remit. If this were to be done within the context of the Online Safety Bill, for example, we would recommend that it stipulates at a minimum in what circumstances there is a requirement for knowledge and data-sharing that is both necessary and proportionate - including

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[29] Regulation of Investigatory Powers Act 2000 (legislation.gov.uk)
[30] Threat to press freedom from anti-terror laws | York Press
Councils used terror law to spy on Covid rulebreakers and vandals | Scotland | The Times
Anti-terrorism powers used to tackle dog dirt | The Northern Echo

specific recommendations for knowledge and data-sharing for monitoring evolutions in the use of technology, and not just investigating incidents.

Creating better processes

Assuming that agencies have been given a clear legal framework within which to operate, further opportunities to collaborate can be unlocked by building appropriate processes to facilitate knowledge and data-sharing.

Participants in this research explained that outdated or nonexistent processes acted as a barrier to law enforcement accessing and understanding information. This is especially important when considering the complexity of the current technology and data landscape. The number of apps, services and devices that can be accessed means that in some cases, police officers may have hundreds of thousands of pages of evidence to go through after extraction. Currently, the analysis of these reports is manually conducted, with officers running many specific word searches to attempt to identify the relevant content. There are many issues with this process, one of which is the fact that officers may not be searching for the right terms (we cover wider training needs within the context of this proposed collaboration in the next section.) Another is the fact that manual exploitation of data, with such comprehensive reports, is extremely time consuming, which limits the number of reports that can feasibly be exploited.

> *"So it's a bit of a vicious circle for us really, smartphones are a wonderful thing for getting information, but again, they just provide us with so much"* - Law enforcement expert

One way to address this barrier could be to adopt "big data" exploitation techniques, such as machine learning, to act as an aide in police officers' analysis. Techniques such as sentiment analysis, which aims to classify the *sentiment* of text-based data to identify key moments of coercion, tension, and more, are currently being piloted within the context of investigations, to render the process more efficient.

> *"A lot of police officers, they have a day job to do, you can't expect them to be specialists. Yeah, this way, you've got to have good software that does that for you. In the same way that accountants quite like Excel, [...] why would you ask [a police officer] to do it manually. And all the grunt work, when I can give him a little bit of software, that just takes care of it for him"* - Technology expert

There are, of course, many ethical and practical considerations to the use of artificial intelligence in policing. This is why we would recommend running pilots to understand the feasibility and acceptability of using such techniques before an implementation at scale is considered. Considering the current trends, it is likely that the data landscape only becomes more complex in the coming years, which means it is crucial to find an approach to data exploitation that works within the context of law enforcement. Professor Paul Taylor, the first national policing chief

scientific advisor, has been given a mandate to identify ways to improve the use of technology within policing. We would recommend that part of his portfolio of work considers the appropriate use of machine learning techniques within policing.

Further, participants in our research highlighted that the current procurement routes within policing and the Home Office seemed to stifle innovation, instead of encouraging it. Indeed, we were told that when small innovative technology companies attempt to gain funding to create new processes and solutions, they are faced with significant barriers to entry. Reasons included government reluctance at appearing to show preference to a particular provider over another, and requirement specifications that blocked entry to the market to smaller innovative technology companies.

> *"A lot of innovation companies are very small if you want to compete for government contracts [...] if you haven't got a turnover of 50 million in a workforce of X number, and accounts going back 10 years, and agreeing green policy and diversity policy. You're just not gonna get a look in"* - Technology expert

This appears to be confirmed when looking at government funding data: only 27% of central government procurement spending in 2020-2021 went either directly or indirectly to SMEs. When looking at direct spend, this goes down to 14%.[31] We would recommend that the procurement routes be reviewed to ensure that they do not create unnecessary barriers to entry for smaller technology companies who wish to work with law enforcement on the creation of better knowledge sharing and exploitation systems.

Recommendations - building the right infrastructure
- Create a clear legal framework for the knowledge and data sharing between the technology sector and law enforcement, which both enables further collaboration and limits its scope to what is necessary and appropriate
- Pilot the use of machine learning techniques within law enforcement to assist in data exploitation, focusing on feasibility and acceptability of such techniques
- Review procurement routes to avoid blocking small innovative technology companies from entering the market and proposing new solutions

3. Getting the upper hand in the technology arms race

Finally, once we have aligned motivations and created a framework for collaboration, it will be important to consider law enforcement and the private technology industry's *capability* to collaborate. A first step will be ensuring that law enforcement has a better understanding of the potential, in terms of both committing and preventing crime, of technology usage in the context of county lines. A second step will be creating dedicated teams working on this collaboration on both

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[31] Central government spend with small and medium-sized enterprises, 2020 to 2021 - GOV.UK (www.gov.uk)

the law enforcement and private sector sides. Both of these steps should facilitate collaboration by ensuring that there is a possibility to evolve with the technology and stay ahead of those involved in county lines.

Building a better understanding of technology within law enforcement

By design, the people we spoke to for this research formed a skewed sample: they were all at the very least interested in understanding the role of technology in county lines, and in many cases actively working in this space. They expressed that their understanding of technology was not representative of the wider capabilities of law enforcement. Instead, they explained that most police officers did not understand the range of technologies involved, as well as what data they could access to better understand these technologies.

> *"People are using smartphones more and more, so that means data must be captured more and more, and maybe it's just that we're not aware of it. We're not tapping into it*" - Law enforcement expert

This was attributed in part to the separation they perceived between teams specifically in charge of analysing the use of technology, and the teams conducting community policing, in charge of the first response to incidents. This is an issue because those teams are most likely the ones initiating the data requests, whether to investigate or monitor county lines. Without the knowledge of what they can feasibly ask for, it makes it near impossible for them to access the right information.

On top of this technical divide between different specialist teams within law enforcement, it appears that the generational divide between older and younger officers plays a role in this lack of understanding. We were told that officers from older generations seemed generally more reluctant to learn about technology, instead forming an attitude that they were too far behind to understand current technology usage. However, taking into account the fact that the young people being exploited tend to be in their early teenage years, if not younger, it is unlikely that the police force will ever be representative of this age range. There is therefore a need to work on this reluctance to engage, by showing the relevance and utility of understanding the role of technology in county lines.

> *"I really hate when people say, 'Oh, I don't do digital.' Oh, and that's fine. I don't do drugs, but I had to learn about it for my job, you know.*" - Law enforcement expert

A clear solution to this problem would be to provide better and more tailored training to officers, to both teach them about the technology, and re-engage them with the process. Insights from our research suggest that this training may be most beneficial if delivered on a "learning by doing" model, where specialist teams work in tandem with community policing teams. This would deliver a further benefit of providing a bridge between these teams, and allowing them to learn from each other's expertise. If law enforcement do gain these capabilities, they should also consider being

more open about them, to act as a deterrent to those running county lines, while being comforted in the knowledge that they will be able to monitor any future developments arising as a result of this disclosure.

Having dedicated digital teams

Another way to ensure that there is capability to profit from a collaboration between the technology industry and law enforcement would be to create dedicated teams whose sole focus is on these collaborative efforts. As mentioned above, such teams have been created in certain police forces, in which experts in digital and communications technology aim to grow their forces' capabilities in exploiting these sources of data. However, experts we spoke to explained that this isn't sufficient, and that it wasn't likely to make a significant impact unless it was a sustained effort throughout all police forces. Indeed, although capabilities appeared to be improving in certain forces with dedicated teams, there were still significant differences between forces throughout the country, leading to a postcode lottery of capabilities.

> *"Certain forces have been granted specific money for county lines but others just don't have the resources to do so. In our force, it's just not possible to run the smartphone of all young people who've been arrested for possession with intent to sell at the moment"* - Member of law enforcement

Further focus, and funding, needs to be put on creating these dedicated teams throughout the country, to ensure digital capabilities do not differ from one police force area to another. We would recommend that a substantial part of the 20,000 officer uplift proposed by the Home Office[32] goes towards creating these teams. We would also predict that this would lead to savings down the line, by allowing officers in the field to be more efficient in their data gathering. However, we would recommend that the benefits of this investment in digital capabilities be monitored, to evaluate whether the costs outweigh the benefits.

The dedicated teams should not just lie within law enforcement, however. For a collaboration to work, there should be clear accountability on both sides, with assigned points of contacts within the tech industry too. In the same way that mobile networks are currently required to have local Single Points of Contacts (SPoCs) to cooperate with law enforcement, we would recommend that a similar measure is enforced for other technology companies collaborating with law enforcement. This requirement for a local point of contact should be upheld even if the company is not officially based in the UK, as is the case for certain companies and may become more common with the development of 5G technology. SpoCs are specifically trained in accessing specific data, which makes their role particularly important: they can add as safeguards to avoid the unnecessary disclosure of data, for example. Additionally, the attractiveness of the private sector in terms of salary compared to the public sector means that many highly trained individuals on the topic of county lines may choose to work in the private sector. Creating these roles, and making them

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[32] [Police officer uplift, England and Wales, quarterly update to 30 June 2021 - GOV.UK (www.gov.uk)](www.gov.uk)

attractive to these individuals, would mean that the expertise can still be shared with law enforcement, via this collaborative model.

> *"If you're a highly skilled technical person in the industry, do you want to work for Essex police, or do you want to work for Facebook? [...] So therefore, they won't get the talent that they really need. So that is where the biggest change can be made, the more sophisticated the more data analysts and things like that, and people that are technically savvy, are close to where those technical crimes are being committed, the better*" - Technology expert

Recommendations - getting the upper hand in the technology arms race
- More "hands-on" training should be provided to law enforcement officers to teach them how to use digital tools and understand the use of technology in county lines
- Law enforcement should not be afraid of advertising their capabilities in order to produce a deterrent effect
- More investment should go into creating teams with digital expertise within law enforcement and this investment should be monitored to assess the costs and benefits over time
- Single Points of Contact (or similar positions) should be set up for liaison with all mobile and communications technology companies

Conclusion

County line operators face strong incentives to adapt their techniques to avoid detection. Given this and the rapid rates of development in the field of personal communications technologies seen over the last few decades, it appears likely that the use of technology by county lines will continue to evolve in the coming years. The technology market is constantly evolving: while the app House Party may have been a key focus of investigations during the first stages of the pandemic in 2020, in August 2022 it looks like it may be more important to understand how to access data from recently popular apps like Tiktok, or even latest newcomer BeReal. It is therefore essential that law enforcement agencies rise to this challenge by collaborating with stakeholders in the technology sphere. If not, there is a risk that law enforcement capabilities will fall further and further behind what is required to tackle county lines.
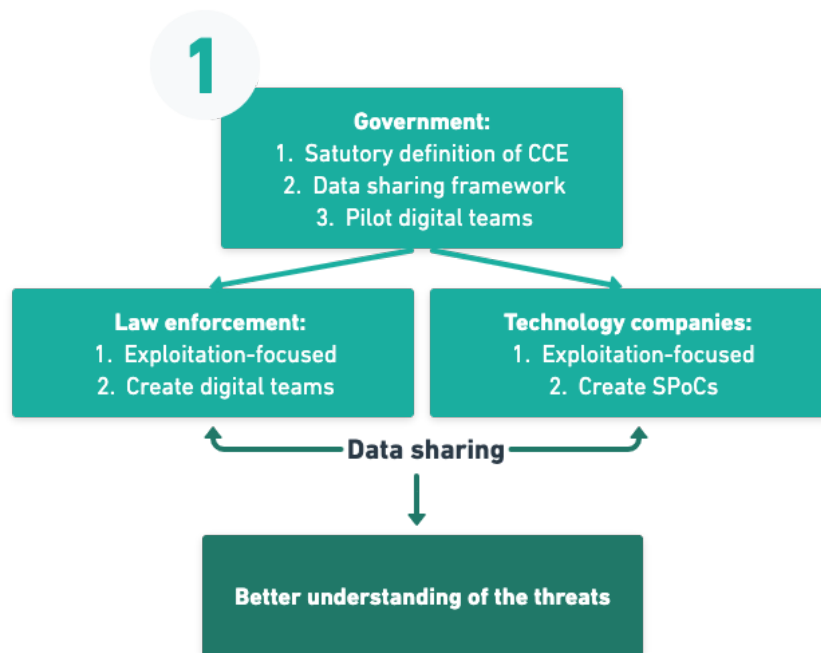
Improving these capabilities will not be a quick or insignificant task. Nationwide changes will be necessary and large investments in technology and talent will be required. With this in mind, there are two areas we believe should be prioritised to have the most impact as soon as possible.

First, the Government should take advantage of the current pause in the progress of the Online Safety Bill through Parliament to add amendments to the Bill to ensure there is a more collaborative approach to county lines. There could, for example, be a requirement for all mobile phone and social media companies to appoint a dedicated SPoC to liaise with law enforcement regarding data-sharing requests. Another amendment could provide a statutory definition of child criminal exploitation. That would help ensure that the criminal exploitation of children in county lines gangs is treated with the same level of urgency and willingness to cooperate by communications companies as child sexual exploitation is.

Second, while we have argued that all police forces would probably benefit from having designated teams with digital expertise, we recognise that these would be costly and take time to set up. We would therefore recommend that digital teams are first established in pilot areas so the Home Office can carry out a cost-benefit analysis before deciding whether to fund digital teams in all police force areas. The establishment of pilot areas could follow the model of Operation Soteria Bluestone in the field of rape and serious sexual violence.[33] The cost-benefit analysis should be conducted yearly and calculate whether the initial costs involved in providing equipment and training to digital teams are offset by increased efficiency and less need for outsourcing. If the digital teams prove to have a net benefit the funding could then be rolled out to other areas.

First stage of implementation of this collaboration

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[33] Operation Soteria Bluestone | College of Policing

1

Government:
1. Satutory definition of CCE
2. Data sharing framework
3. Pilot digital teams

Law enforcement:
1. Exploitation-focused
2. Create digital teams

Technology companies:
1. Exploitation-focused
2. Create SPoCs

Data sharing

Better understanding of the threats

These changes would also lay the groundwork for further significant changes, as outlined in this report. Increasing digital capability in law enforcement and creating a collaborative model of data sharing with communications companies would not only substantially improve the response to county lines, but would have considerable wider benefits too.

Second stage of implementation of this collaboration

2

Law enforcement

Easier procurement →

← Innovation

Technology companies

Upskills police officers

Pilots AI / Big Data processing

Better deterrent capabilities