Drug trafficking — county lines

Coerced criminality

Report summary

This **FinCrime threat intelligence report** aims to help financial institutions (Fls) better understand the transactional profiles that could indicate a customer is involved in **drug trafficking**. By understanding the behaviours of the drug runners, the industry can better detect and disrupt this type of criminal activity and pass actionable insights onto law enforcement. This report focuses on criminal activities related to **county lines** and specifically how to identify signs of young or vulnerable people who have been recruited into the activity to act as runners for drug gangs, through an example of **coerced criminality**.

County lines is a massive problem with an estimated 27,000 children involved¹ in the UK and requires a response on all fronts to tackle this issue at scale. Whilst the term has become almost synonymous with all street-level drug dealing, it is important all aspects which make it a unique problem are clear and highlight why it is so important to treat it in a separate way to drug dealing in general. The county lines model is specifically designed to take advantage of the young and vulnerable, and distance the real criminals from threat of prosecution. This means that the people who run these lines can be charged with offences under modern slavery and human trafficking laws, as well as those related to drug offences.

This lite report will describe the behaviour of a typical runner and the key transactional identifiers for banks to look for to aid more accurate detection and flagging to law enforcement. The full report, which is available upon request, provides granular detail into behavioural patterns that can be expected of drug runners caught up in county lines activity. This includes the transactional profile before they start working in drug trafficking, the process of recruitment and the movements across the transport network which are indicative of this activity. At every stage the report shows where interaction with the banking system is likely to occur, which can be used by banks to examine the rules they should put in place to detect this activity. Finally the report examines a number of case studies which bring to life the impact of such criminal activities and the positive role banks can play in stopping it.



If you would like access to the full in-depth report, or would like to share your view on our research, please contact us at **netreveal.ai/contact**





Scale of the problem

The "lines" part in county lines refers to the phone lines that each group uses to market drugs to their users. Each line is branded with a nickname which becomes associated with the type of drug on offer, these nicknames can be used across multiple phone numbers across the country. The National Crime Agency identified at least 3,000 different lines across the UK and each one can earn between £2,000 and £5,000 per day or up to an estimated £800,000 in profits per year². One line that was identified by North Yorkshire Police in 2018 saw 25,000 bulk text messages sent from it in only four months, advertising drugs for sale. With the ever increasing options of communication channels, there is little stopping new lines emerging so there are likely to be many more out there.

The drug business works like a pyramid, with a small number at the top importing drugs from overseas and wholesaling to wider and wider networks. This high-level activity is very difficult to discern in retail bank accounts, therefore we believe the main thing banks can do to disrupt this activity right now is to attempt to discover the lower-level activity and feed this information to law enforcement. At the entry-level are 'runners'; generally children ages around 12 upwards from deprived areas and backgrounds who may not know it, but are being exploited by 'elders' who take advantage of their vulnerable status to coerce them into criminality. Moreover even the runners can earn good money, £1,000 for a week's work is not unheard of³.



Relevance for financial institutions

County lines can be broadly thought of in two halves; the higher-end where the profits are going and the lower-end where vulnerable children are being exploited. A bank's primary responsibility is to their customers and shareholders, and this report challenges banks to ensure they are doing all they can in identifying young people who may be caught up in this criminal activity. Moreover if an account can be identified as being held by a potentially vulnerable individual, the relevant suspicious activity report (SAR) must be marked with either an XXV2XX (vulnerable adult) or XXV3XX (risk to children) glossary code. This means that the SAR must be investigated by law enforcement.

In the UK, there is a concerted effort to detect and disrupt this behaviour and banks can play an important part of this. There are perceptions that county lines behaviour is either too broad to detect or too "cash-based" to spot in the banking system. Whilst both of these perceptions are grounded in reality, it is also true that some behaviour is detectable and this report should be seen as an example of what it is possible to see in financial transactions.

As Matt Edwards from the UK Financial intelligence Unit (UKFIU) SAR enquiries and action team said: "We would encourage reporters to ensure all their staff are up-skilled to identify relevant activity (of county lines), and articulate these suspicions clearly within their own submissions"⁴. This means law enforcement expect banks to learn all they can about these behaviours so they can submit clear and articulate SARs giving the police the best chance to meaningfully disrupt such criminal activity.

Typology definition

There are eight key stages of drugs trafficking and county lines (DT-CL) in the UK, with each one having unique techniques and resulting financial flows. This report details each stage, which helps UK banks develop a clearer understanding of the nuances of each technique and knowledge of what transactional profiles of those caught up in county lines might look like.



Drug networks and organised crime groups (OCGs) run their operations like a business and approaches will vary to how lines are run. This articulation and associated simulation aim to look for signs of coerced criminality and help identify young and vulnerable people who are being exploited into the drug trade.

| Stages | Recruitment | Relocation | Set-up | Exploitation | Proceeds — placement | Proceeds — layering | Proceeds — integration | Termination |
|------------|--|-------------------------------------|---|---|---------------------------------------|--|---|--|
| Techniques | Elders groom new runners on social media | Runners travel to sale location | Elders find properties to act as trap-houses | The line receives orders | Runners receive payment | Runners sell goods online | Runners use excess cash to fund lifestyle | Runner is rescued by law enforcement or charity intervention |
| | New runners are put into debt bondage | Elders use local kids as runners | Elders market drugs using the branded line | Runners transport the drugs to the users | Runner puts 'wages' in the bank | Runners transfer money to a parent | | The OCG is disrupted by investigations and arrests investigations and arrests |
| | | | Elders arrange the drug supply | Runner returns with the cash | | | | |
| | | | | The OCG moves drugs from the hub to the sale location | | | | |
| | | | | The OCG brings in more supply to the hub | | | | |

Figure 1 Visualising the stages and modus operandi of DT-CL.



Actor profiles

County lines runners don't necessarily perceive themselves to be victims; they're young and impressionable, and are typically groomed to either believe someone cares about them, or that their involvement is the best way to provide for themselves and their families. In many cases this last point is tragically true in places where there is very little social mobility. Intimidation and threats of violence follow involvement which make it difficult to exit the business.

Elders/gang leaders are careful to avoid creating a financial footprint, so identifying county lines activity involves identifying vulnerable profiles and looking for a series of indicators.

| | Gender | 70-30 male/female | | |
|------------------------------------|------------------------------------|---|--|--|
| | Age | Typically 14-17 (can be as young as 11) | | |
| Account simulated Runners of | Nationality | British; ethnicity depends on location of the OCG. Could be Afro-Caribbean, Asian, Mixed Race, White. | | |
| county lines Coerced criminality | Other details | Victims are frequently from low income areas with limited prospects. Likely to be children to a single parent who are the recipients of multiple benefits. Cashrich lifestyle is idealised, following social media influencers. | | |
| | Day to day actions and motivations | Once involved, victims will struggle to leave due to coercion and threat of violence. Some are involved to achieve a certain lifestyle, others to support their families. Likely to be loyal and protect OCGs. | | |
| | Gender | 80-20 male/female | | |
| | Gender | 00-20 male/ lemale | | |
| | | | | |
| | Age | 18-25 | | |
| Elders (Couriers, | Age Nationality | 18-25 British; ethnicity depends on location of the OCG. Could be Afro-Caribbean, Asian, Mixed Race, White. | | |
| | | British; ethnicity depends on location of the OCG. Could be Afro-Caribbean, | | |

Other actors

There are other actors involved in County Lines and a drugs trafficking group has a defined hierarchy and a complex network of operations. The following roles also exist in the OCG's system:

| Drug wholesalers | Gang leaders | Money mules | Cuckooed users |
|------------------|--------------|-------------|----------------|
|------------------|--------------|-------------|----------------|

It is also crucial to be aware of the runners' parents, especially if they are children. This is important because some victims will use proceeds from county lines to help their families out financially. Additionally, links to low income families is another way to identify vulnerable children.



Conclusion

County lines is a large problem; there are thousands of lines, tens of thousands of young people wrapped up in it, and in reality countless ways day-to-day activities can be enacted. Moreover, you may read this report and immediately think that indicators outside of the banking systems are better suited to catching this activity. However, whilst reasonable, this misses the point. Banks can and should play a hugely important and complimentary role in stopping this activity by understanding the nuanced financial footprints which indicate a vulnerable person has become tangled up in the drug trade.

From the full report banks can start to understand the profile of typical runners, the types of behaviour to look for and the links between key indicators which build up a picture of a potential risk. We suggest the first step the industry can take is to try and identify the lowest-level of criminality, from which law enforcement can protect the individuals that need protecting and investigate links to higher-level criminals.

Finally it is clear that the modus operandi of county lines groups will continue to shift over time, and whilst Covid-19 has not led to a decline of young drug runners, it has had at least a short-term impact on behaviour. In 2020, reduced rail travel led to runners using the rail network becoming much more conspicuous and therefore arrests became easier, which in turn forced those not arrested to look for other modes of transport. We will continue to research the county lines problem and its footprint in the banking system and we will publish further reports to our subscribers as we notice behavioural profile changes.



Financial institutions have a key role to play in detecting the accounts of vulnerable young people, caught up in county lines activity. However, it's hard to understand risk indicators in enough detail to distinguish criminal activity from non-criminal activity.

At SymphonyAl Sensa-NetReveal, we are developing the <u>FinCrime testing service</u> to simulate the transactions of county lines runners and other criminal and victim behaviours. Using this simulation, the FinCrime testing service can test and quantify your anti-money laundering detection systems to help you understand which behaviours you are detecting and those that are being missed.



If you want to test your organisation's ability to detect County Lines then contact us to register your interest here:

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Find out more about how banks can fight back against human trafficking. **Download the brochure today.**



About SymphonyAl Sensa-NetReveal

SymphonyAl Sensa-NetReveal, a division of SymphonyAl, provides leading Al-based financial crime detection software.

References

 $^1\,https://www.independent.co.uk/news/uk/home-news/drugs-trade-treatment county-lines-children-heroin-dame-carol-black-review-home-office-a9363966.html$

 $^2\,https://www.national crime agency.gov.uk/who-we-are/publications/257-county-lines-drug-supply-vulner ability-and-harm-2018/file$

³ https://www.vice.com/en/article/gyjzbw/what-its-really-like-going-country

⁴ https://uk-podcasts.co.uk/podcast/the-ukfiu-podcast/episode-5-using-sars-to-tackle-county-lines-drug-s

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