

REFORMING DRUG POLICIES TO REDUCE THE TRAFFICKING AND EXPLOITATION OF VULNERABLE PEOPLE.





THE SYSTEM IS BROKEN.

‘Drug prohibition’ is the global system under which the production, supply and sale of certain controlled substances are subject to strict criminal penalties and enforcement. There is nothing inevitable about this approach; rather it is the consequence of treaties that were established by the United Nations over fifty years ago, and which remain largely unchanged since.

While prohibition remains the global norm, it places the entire drug market in the hands of organised crime. The illegal market is lucrative and is still expanding despite half a century of the so-called ‘drug war’. With no regulatory oversight, and no recourse to legal protection, the exploitation of children and vulnerable people has become a primary tool of many organised crime groups (OCGs) as they seek to maximise profit and evade law enforcement. We believe that this must change. By legally regulating the drug market – putting production and supply under strict controls – both the opportunity and profit motive for human exploitation in the drug trade will diminish, undermining the power of OCGs and reducing the risks to vulnerable people.

Over 17% of potential victims of trafficking or slavery identified in the UK in 2019 were **exploited as part of the illegal drug trade.**

The prohibition of drugs has long been justified on the grounds that it protects young and vulnerable people. Its supporters claim that, by criminalising people who use and supply drugs, we can reduce consumption and keep people safe. But experience of the past 50 years demonstrates that prohibition cannot achieve these aims, and in fact **actively undermines them**.

The UK drug market has expanded dramatically over recent decades, with its value estimated at **£9.4 billion in 2020**.¹ Forms of modern slavery within the illegal drug market are a direct consequence of drug prohibition.

Research by Transform has found that 1,853 potential victims of trafficking or slavery were referred to the UK's National Referral Mechanism in 2019, specifically in relation to forced cannabis cultivation or county lines drug supply.² **Over 60% of these were children**. A total of 10,627 referrals were made in 2019, meaning that the illegal drug trade makes up nearly a fifth of human trafficking and slavery in the UK.³

In reality, both figures are likely to be much higher. Recent police data analysis has produced a conservative estimate that there are up to **100,000 victims of slavery in the UK**.⁴

If this figure is correct, upwards of **17,000 people are currently being exploited as part of the illegal drug trade**. Far from protecting vulnerable people, drug prohibition actively puts them in danger of exploitation and trafficking, depriving them of their dignity and freedom.

The relationship between the illegal drug trade and modern slavery is complex and varied. It includes:

- The trafficking of young and vulnerable people for forced labour to work in drug 'farms'.
- The exploitation of young and vulnerable people to transport and sell drugs, including the 'county lines' child exploitation phenomenon.
- Criminalising vulnerable people, marginalising them and steering them away from important support mechanisms.

The United Nations Office on Drugs and Crime acknowledges this dynamic:

‘International drug control has produced several unintended, yet costly, consequences... Among them, the most formidable collateral damage has been the creation of a lucrative black market for controlled substances, dominated by powerful crime cartels and resulting in unprecedented violence and corruption.’⁵

‘We note with concern persistent and emerging challenges related to the world drug problem, including the following: that both the range of drugs and drugs markets are expanding and diversifying; ... that increasing links between drug trafficking, corruption and other forms of organized crime, including trafficking in persons, trafficking in firearms, cybercrime and money-laundering and, in some cases, terrorism, including money-laundering in connection with the financing of terrorism, are observed...’⁶

The manipulation, trafficking and enslavement of people within the illegal drug trade not only leads to severe trauma as a result of exploitation and violence, it also causes vulnerable people to be criminalised as drug offenders rather than being recognised as victims of trafficking or slavery.

As a consequence, drug law enforcement is given precedence over supporting victims.

Legally regulating the production, supply and possession of illegal drugs is the only means to remove both the opportunity and profit motive for exploitation in the drug trade.

Legal regulation is not a silver bullet, and exploitation exists in legal industries. But regulation allows governments to regain control over the drugs market, significantly reduce the role of OCGs in drug supply and have the means to better protect vulnerable people from exploitation.



FORCED LABOUR IN DRUG PRODUCTION.

Minh was 16 when he arrived in the UK. When he emerged from the back of a lorry somewhere near Dover in June 2013, he had no idea where he was or where he had been since he left Vietnam. He only knew he was here to work.

His memories of the three months he spent locked in the house are fractured and distorted by the fear, loneliness and stress that consumed him. His only visitors were Vietnamese men who would appear at the house every few weeks to check he was looking after the plants properly. They barely talked to him, leaving boxes of frozen meat that he heated up in an old microwave in the kitchen. They always locked the door behind them when they left. Apart from that, he was always alone.

Behind the blackout blinds, days merged into night and back to day. Inside, Minh sat in the dark and the filth. He was hungry all the time, and terrified his food would run out. After a few days, the sweet, thick stench of the cannabis buds was overpowering, making him sick with headaches and nausea. He knew he would be in terrible trouble if the plants died, so every day he carried buckets of water upstairs to the plants and mixed chemicals into the soil.

Once, he says, he tried to get away, but was caught and brought back to the house, and was made to understand that he'd be killed if he tried to escape again. *"It was like another kind of world,"* he says. *"I didn't really even feel human. I understood very quickly that the plants were more valuable than my life."*

The day of the police raid marked the end of Minh's enslavement and his liberation from his traffickers. But his ordeal was not over. Instead, Minh would find himself trapped in a system that treated him as a criminal rather than a victim.⁷

Despite prohibition, the demand for drugs continues to increase, leaving an entirely unregulated market for OCGs to capitalise on.

The UK cannabis industry alone is estimated to be worth £2 billion, with most of this cannabis being grown domestically.⁸ However, large-scale cannabis farms require regular tending and OCGs may have multiple farms in any one area.

To maximise profit margins and reduce risk of detection by law enforcement, **children and young people are commonly trafficked from abroad and enslaved as 'gardeners'**.⁹ Farms are often contained in suburban houses or empty flats, with some victims locked in the properties, visited only by their traffickers to provide food and supplies, while others are watched over more regularly.¹⁰

The Independent Anti-Slavery Commissioner notes that *‘exploiters use minors or vulnerable adults as they are easy to manipulate and/or coerce, and they do not pay them’*, while many are trapped in a form of debt bondage.¹¹

Traffickers commonly use violence and torture to control victims. **They may also instil a fear of the police and authorities**, often playing on cultural mistrust of authorities in victims’ home countries, leaving victims so afraid of discovery and deportation that they comply with severe restrictions on their movement.¹²

Sadly, where victims are able to escape, they are **too often treated as immigration offenders or criminals working voluntarily in illegal drug cultivation**.¹³ These compounding factors make it difficult to detect and identify victims.

In January 2018, a terrified 18-year-old Vietnamese man walked into a police station in London and told police that he had spent five years being trafficked in and out of cannabis houses by criminal gangs across the capital.

In halting English, he tried to explain how he had been taken from Vietnam, travelling overland across Europe, before being put in the back of a refrigerated lorry in France and brought to the UK to work in cannabis cultivation, he says.

Yet instead of interviewing him as a potential victim of modern slavery, the police called the Home Office, his lawyers say. He was then detained under immigration powers and taken to Brook House immigration removal centre.¹⁴

According to data disclosed by the Home Office following a freedom of information request from Transform, **714 people were referred as potential victims of trafficking or slavery** to the UK's National Referral Mechanism (NRM) specifically in relation to forced cannabis cultivation in 2019 – **172 of whom were children**.

The real figure is likely to be much higher; this is only the number of potential victims identified by agencies designated as 'first responders' (including the police and local authorities) and consenting to NRM referral.¹⁵ This form of trafficking is particularly common with young Vietnamese males – often children.¹⁶ In 2019, **427 Vietnamese children were trafficked to the UK**, up from 314 in 2018.¹⁷

Where cannabis is legally regulated, as in Canada, producers and retailers are licensed and subject to strict regulations. It is prohibited to employ minors in the production and supply chain, employees are protected from unlawful exploitation, disputes can be settled without recourse to violence and consumers are shielded from purchasing products linked to trafficking and human slavery.

That is not to say that exploitation is not an issue in legal supply chains, too. However, legal regulation allows governments to monitor and respond more effectively to any exploitation that is identified. By contrast, in an unregulated and illegal market such as the UK, the supply chain is **primarily controlled by OCGs**, with the smaller suppliers being subjected to threats from both upstream suppliers and law enforcement.

To put the scale of exploitation into perspective, the number of people identified as potential victims of forced cannabis cultivation in the UK in 2019 was **12.5% of the entire legal workforce in Canadian cannabis cultivation** – a country just over half the size of the UK.¹⁸ With no external oversight, legal recourse or employment rights of any kind, what remains is the perfect environment for exploitation.



DRUG SUPPLY.

The county lines phenomenon has been identified in recent years as a major form of criminal exploitation of young and vulnerable people for the purpose of moving drugs around the country.

Vulnerable people exploited as part of county lines drug trafficking, often children, may be groomed with promises of money, social inclusion and status. They are commonly exposed to high levels of violence, and are forced to travel around the country to supply drugs by threats, violence and extortion.¹⁹

Once exploited, they are entrapped in an illegal activity for which they **face arrest and imprisonment**. Reports indicate that this form of exploitation is increasing, with **children as young as seven** being exploited to move drugs around the UK.²⁰

County lines: drug supply networks set up by organised crime groups (OCGs) between urban and suburban locations, often exploiting children or vulnerable adults as drug ‘runners’ and dealers.

Statistics disclosed by the Home Office in response to a freedom of information request from Transform reveal that, in 2019 alone, **1,139 people** were referred as potential victims of trafficking or slavery to the UK's National Referral Mechanism specifically in relation to 'county lines'. **1,001 (88%) were children.** Again, this is only the number of children identified by first responders, meaning the actual number of victims is likely to be far higher.

The Children's Commissioner has previously estimated that nearly **50,000 children in England** are involved in OCGs, while the National Crime Agency estimates that nearly **2,000 OCGs are involved in supplying illegal drugs.**²¹ Other research has indicated that there may be **2,000 children** linked to county lines in London alone.²² As outlined in Home Office guidance, 'any child who is recruited, transported, transferred, harboured or received for the purposes of exploitation is considered to be a trafficking victim, whether or not they have been forced or deceived.' Children are not able to give informed consent to exploitation.²³

"I started smoking skunk [cannabis] at nine years old. That's about normal where we're from, it's everywhere really. Weed's the easiest thing to get. That's how the dealers first got to know me when I was a kid. Then my mate introduced me, and I started selling weed for this 16 year old lad. He'd give us a quarter to sell on tick, then it went up to an ounce – then I was doing an ounce or two a day.

The real graft is in heroin and crack. I'd already been kicked out of regular school when I was around 11, just for fighting and smoking weed – so my mate who knew some olders introduced me and I started selling crack around my area. But it only got really serious when I went country. I've been everywhere, all round the country. I started in Mold in Wales when I was 14. Since then I've been in Queensferry, Devon, Cumbria, Stoke, Middlesbrough, Crewe, all over – selling crack and heroin.

*You tend to go to the same places again and again, but a few months apart. My boss would have someone take us down there, and I'd do the serving up. I'd go meet the smackheads while they were gouching or rattling. We'd take over a crackhead's flat, pay him three rocks a day – and I'd sleep on the couch. Honestly, they were usually fucking nasty, disgusting places – fucking plants growing out the wall."*²⁴

The Children's Commissioner:

‘In this [county lines] system, younger children are often taking the biggest risks, and it's often the most vulnerable children – those living in care or with learning disabilities or no parental support – who are targeted by organised criminals. The levels of extreme violence are rocketing and it will require intensive work to disrupt and divert young people away from gang membership and the drugs trade.’²⁵

County lines victims are exposed to varying levels of exploitation including physical, mental and sexual harm. Some vulnerable individuals are trafficked into remote markets to work while others are imprisoned in homes which have been taken over (‘cuckooed’) using force or coercion.²⁶ OCGs use high levels of violence, fear and intimidation to establish and maintain their markets.

The Home Office:

‘There is good evidence that illicit drug markets can drive serious violence. The main mechanism seems to be via disputes that cannot be resolved legally, so individuals and groups resort to violence (and establish reputations of violence) to avoid being taken advantage of in the market.’²⁷

National Crime Agency:

‘The current county lines criminal business model thrives on the exploitation of vulnerable adults and children to move and deliver drugs. This enables offenders to maximise their profits and reduce the risk of their criminal activity as it distances them from the supply transaction.’²⁸

County lines exploitation only exists on such a scale today because of drug prohibition.

Dame Carol Black's 2020 review of drug markets, commissioned by the Home Secretary, stated that new supply networks often emerge after effective police campaigns to disrupt existing supply chains.²⁹

A separate report from the Home Office has acknowledged that these disruptions often increase violence and the newer suppliers are often more ruthless than their predecessors.³⁰ Furthermore, OCGs groom and exploit young and vulnerable people because they are harder for police to detect and arrest, are easier to exploit and intimidate, and are readily replaced.³¹

Victims experience barriers to seeking help, often fearing arrest if they disclose what is happening to them.³² Significantly, they are less visible to drug enforcers and virtually immune to infiltration by undercover police, or informants. The UK Home Office has also been criticised for relying on child informants as young as 15 to attempt to infiltrate OCGs involved in county lines.³³

So long as there are vast profits to be made from selling drugs, exploitation and violence cannot be solved by criminal law enforcement, only displaced.

Lizzie's* daughter, Cara*, was a normal teenager living in the West Midlands who was into sports and good at English. But when she was 13 she made friends with a gang of older girls.

“Her appearance started to change, her social friends started to change, her whole behaviour started to change. She was getting into trouble at school, getting excluded and hanging around with people who were stealing,” says Lizzie.

Then she started going missing. The police told Lizzie they were concerned Cara was being groomed and exploited. On one occasion, she was discovered with an older woman in a flat in Northamptonshire which contained drugs and cash. She was brought home by police but soon went missing again. Lizzie was terrified.

“You fear that your child could be dead, you just can’t sleep, you can’t think, you can’t focus and it’s high levels of stress.”

Following a police investigation, Cara was eventually found in a flat in Lincoln. The 14-year-old had been trafficked there by a drug dealer from Birmingham who was running a county line. She had been made to deliver heroin and crack cocaine night and day, only going out to sell drugs. Police found her and a teenage boy in the freezing flat surrounded by drugs, syringes and a bloodied knife.

“He instilled the fear of death into those children. He had no intention of giving those children anything. They were too frightened even to leave the flat to buy food to eat,” says Lizzie.

*Names have been changed to protect identities.³⁴

Criminalisation drives exploitation. There is no way to change this equation. Only through legal regulation can we put the state, rather than organised crime, in control of the production, supply and possession of currently illegal drugs.

Many individuals who currently purchase drugs on the illegal market would **prefer to purchase from a safe, legal source** – and by doing so would avoid the risk of being drawn into low-level supply themselves. In a well-designed regulated market, demand for illegal supply would shrink – reducing the profit margins available to OCGs, and their scope for exploitation, violence, trafficking and child labour.³⁵

Moving away from drug law enforcement would also free up valuable police resources to instead focus primarily on identifying exploitation and trafficking effectively, ensuring victims are moved into adequate support mechanisms.



EXPLOITATION OF WOMEN AND GIRLS IN DRUG SUPPLY.

Many women who end up transporting drugs are co-opted by networks that use similar methods to those employed in human trafficking crimes. That is what happened to Liliana, a Venezuelan woman with two children who agreed to transport drugs under the threat that her family would be harmed if she refused. She is incarcerated at an Argentine federal prison and her children remain in Venezuela. [...]

"I had a normal life, every day I took my children to school before going to work. One day a Colombian man began approaching me, sort of flirting, and saying that I should carry drugs to other countries. I said no."

When Liliana refused, the man started threatening to hurt her family.

“My mistake was not seeking help. Little by little I gave in. If they set your life against the lives of your children, your relatives, you will choose their lives. Let them do what they want with me.”

Afraid of putting her family at risk, Liliana agreed to transport drugs to Peru. But she later realised that the original plan was not going ahead and that she’d been kidnapped by this group of people. First they took her to Caracas and then to Ecuador.

“They would tell me: remember that we know where your children are, remember that we know where your family is. First we’ll kill you and then your whole family.”

Liliana was taken to another place where they dressed her and placed vacuum-sealed packets of drugs on her. *“They never talked to me about money... They brought me clothing, I had to pass off as a tourist. Maybe they put me there as a decoy so someone else with more drugs could get through. I was carrying 1 kilo 600 grams.”*

They told her she would be transporting the drugs to [...] Georgia, Asia, with a stopover in Brazil. Before departing they changed the itinerary: her first destination would be Argentina. *“They said, ‘Don’t worry, nothing will happen. There’s no scanner, no dogs, there’s nothing there.’ Even before I got to the end of the walkway, Customs and Migration officials were waiting for me.”*

Liliana accepted what is known as an ‘abbreviated trial’ in Argentina, which is similar to a plea bargain. In these cases, the prosecutor offers the accused a more lenient sentence for a given offence if that person admits guilt.

By accepting the plea agreement, Liliana could not explain to a judge that she had been threatened into transporting the drugs.

Nor could she say that she had been confined and put under other people’s control, or that they had threatened to harm her children and relatives. During the process no one asked her about the people who had ‘hired’ her to transport drugs.³⁶

Women are disproportionately imprisoned for drug supply offences around the world, with 35% of the female prison population worldwide being imprisoned for drug-related offences, compared to 19% for men.³⁷

In Peru and Costa Rica, **over 60% of women in prison are convicted of a drug offence. In Thailand this figure is over 80%.**³⁸ This is closely linked to the fact that many women, often coming from socially or economically marginalised backgrounds, are exploited by OCGs and partners into low-level illegal drug activity.

The United Nations Office on Drugs and Crime (UNODC) records that women are often forced to carry out these activities ‘through coercion or intimidation, or by being deceived into trafficking drugs unwittingly, or in an attempt to help their loved ones.’³⁹

By predominantly carrying out low-level activities in the supply chain, **women are more expendable to OCGs**.⁴⁰ As low-level actors, they are easier for law enforcement officials to identify and arrest than more serious players within crime networks.

Most frequently observed in Latin America, women and girls transporting drugs are used as unwitting decoys to divert attention from a larger-scale drug smuggling operations. **The OCG tips off law enforcement** of an expected drug delivery, identifying the woman or girl, which leads to their arrest. Therefore, **OCGs actively play on drug law enforcement to circumnavigate it**, and women are often the victims.⁴¹

UNODC:

‘Studies indicate that many women arrested for drug-related offences, in particular drug trafficking, had been victims of human or sex trafficking and forced to carry drugs’⁴²

The incarceration of low-level female drug offenders, many victims of exploitation, contributes nothing to dismantling illegal drug markets, improving public security or protecting the vulnerable. On the contrary, **prison often makes the situation worse**, further limiting their chances of finding decent and legal employment on release, thus perpetuating a vicious cycle of poverty, risk of homelessness, exploitation in drug markets, and imprisonment.

Imprisonment detrimentally impacts many children who are left without their mothers – or are instead **imprisoned alongside them, as is the case for 19,000 children worldwide**.⁴³ Incarceration for low-level, non-violent offences is counterproductive and harmful: we need to work together to support marginalised populations into meaningful employment and long-term prospects, rather than fatally limiting the life-chances of those who seek a way out of poverty through illegal drug supply.

“My dream was always to come to the city. One day I headed to the bus terminal and I met some people I had known all my life, and I felt, I don’t know, I didn’t feel insecure about saying I’d go with them.

One of my cousins had said she would go and pick me up, but she never came to the bus terminal. When these friends saw me they said, ‘and what are you going to do?... If no-one’s here for you, you’re all alone, you don’t have anyone’s phone number.’ I got really scared, I don’t know if it was because it was the first time I was going to the city. All I know is that I agreed to go with them to the airport and on the way there they said to me that we were going to go by airplane to Tijuana because they bought for their clothes shop, clothes in Tijuana and that they couldn’t leave me here alone, that I should go with them.

So we arrived at the terminal, her husband said ‘I’m going to carry the child, help me with this bag, come on, we’re going to go up there. You put your things there, they’ll check them, we’ll wait for you up there.’

Then the place quickly filled up with police. About three hours passed when they came with the analysis of the packet. And from inside the packet they took out a very

strong-smelling substance that they called Diacetyl Morphine. I didn’t even understand what this was but one of the policemen said ‘Oh, ignorant Indian woman, you’ll get many years for this. This is not only an expensive drug, but a very dangerous one. Where did you get this from? Who’s the gang leader? Who do you work for?’

They took me to a place and kept me there for eight days. I was blindfolded, there was a lot of violence. They burnt me. The last two days, I remember a policeman came who they called ‘the wolf.’ I’ve never forgotten this. And he said to me, ‘ay, ignorant Indian lady, you’ve been to many places and you’ve not wanted to spill the beans. Well, with me even mutes speak, even if they have to sign. I’m going to rape you in a way you’ll never forget as long as you live.’

When he did it, I felt like my head was shattering into a thousand pieces and I felt vulnerable and abandoned and alone. All I remember about him is his weight, and that smell and he said ‘now you’ll sign.’ And he brought a piece of paper and the first time I went to court they showed me where I had signed. There was no judge but there was a secretary of orders and they told me my trial would be very quick as I had already confessed. I didn’t even know what confessed meant, nor any of the terms they used.”⁴⁴



EXACERBATING PROBLEMATIC DRUG USE AND MARGINALISING THE MOST VULNERABLE.

Emma Black (not her real name), 46, has struggled with drugs since she was 13. A heroin user, she says her mother was also an addict and she first used drugs with her.

Now a mother herself, she lived in Weston and has experienced the devastating impact of county lines first-hand. Although still using heroin, after a period of homelessness she was provided a flat with a local housing association, which she saw as an opportunity to help her 'get clean'. But two weeks into her tenancy, she returned home to find a young man at the top of her stairs. She recognised him from a friend's flat but knew nothing more about him. She said: *"I'd never spoken to him before and there he was at the top of the stairs and he says: 'Can I come in? Can I come in?'"*

Emma refused, but he persisted. He reassured her he would only be in the flat for a couple of hours and would give her ‘eight bits’ for free, bits being a bag of heroin or a rock of crack cocaine, with a rough value of £10.

She said: “Well, as soon as he said that my head fell off. All I could think about was the drugs so I let him in and then another three or four turned up. Young, really young as well. Two of them – they were, like, no older than like 16. They were from London. It turned out they worked for the same line I had been using to get my drugs from.”

Emma was being ‘cuckooed’ – when drug dealers take over the home of an often vulnerable person in order to use it as a base. The young men set themselves up in her home, asked for knives to protect themselves, smoked cannabis and ultimately refused to leave.⁴⁵

Human traffickers are known to target vulnerable people, meaning trafficked individuals are often suffering from intense personal trauma, which may stem from child abuse or sexual violence.⁴⁶ Those who have experienced such trauma are also far more likely to get involved in problematic drug use, leaving them even more vulnerable to traffickers.

A report from the Salvation Army has found that people with substance misuse problems can be exploited because of their drug dependence and vulnerability, while attitudes towards them can often be judgmental and unsupportive.⁴⁷ The National Crime Agency has identified the most significant group of vulnerable adults targeted by OCGs in county lines to be those with problematic drug use.⁴⁸ In many cases OCGs supply vulnerable adults with drugs, **creating a drug debt that the individuals are then forced to pay off by working on a county line** either by running drugs or having their home used for drug transactions. Such vulnerable individuals are also at risk of sexual exploitation, trafficking into forced prostitution, and financial exploitation.

"Since I was fourteen, sex and my drug habit went hand in hand. But it was later, when I picked up heroin and crack, that everything changed. When you get that far into addiction, even the people that love you most can't help anymore.

I came to Bristol in my twenties and fell in love with my partner. We became friends with another couple who were using too; the woman said, 'come out on the street with me'. It was a freezing cold November, I was ill and I was desperate. I'll never forget the feeling of absolute horror when I realised girls were selling themselves for so little money.

My reality was dawning on me. I continued on and off for about six months. I'd be affected for days, not being able to tell anyone, and the men just, uh, just made my skin crawl.

I tried to stop but I couldn't stick to it and my relapse was horrific. The using was getting really dangerous. I was badly raped and robbed by a dealer. I started doing recovery meetings in another city but started using again. I lived in a hotel for a couple of weeks with these two drug dealers, sleeping with both of them for my drugs.

A friend helped me into a dry-house – that lasted a week. I went to another friend, detoxed, used again. I was using, street-working, using, street-working...

Eventually I got help and got into treatment. It's taken a long time to get to the point where I am even able to cry. Stuff only comes out when it's ready. In rehab I started to look at the childhood sexual abuse with my dad. As the drugs left me, my mind cleared."⁴⁹

These people clearly need sympathy and support; however, punitive drug laws mean that their **problematic drug use is treated as a criminal justice, rather than a health issue**. Rather than being supported into treatment, they are too often further marginalised and left at greater risk of exploitation. Criminalisation may lead people to re-traumatisation, worsening mental health outcomes, ineligibility for certain housing schemes, and the creation of barriers to accessing employment. All of these factors serve, in turn, to make them far more vulnerable to re-exploitation than to leading safe and stable lives.

We need drug policies that work to **move vulnerable people away from the risk of exploitation**, not ones that push them towards those dangers. Drug laws have been a key driver in prison overcrowding and burgeoning criminal justice spending. With reform, these financial resources could be diverted to mechanisms designed to support, rather than punish, people.

Where people have substance use issues, we need to not only avoid criminalisation, but also help ensure a legal source of safe supply that can prevent the kind of interactions that create opportunities for grooming, intimidation and debt. The fewer the opportunities for OCGs to interact with vulnerable individuals, the lower their opportunity for exploitation. Again, experience has shown that **criminalisation simply makes these problems worse**.

Not only are people with drug problems more likely to be drawn into human trafficking, but survivors of trafficking are also more likely to become engaged in problematic drug use. The NCA has recorded that traffickers use drugs and alcohol for the purposes of sexual exploitation.⁵⁰ The threat of criminalisation, and the associated stigma, frequently pushes drug use into marginal, unsafe and unhygienic environments, further increasing the likelihood of re-trafficking and exploitation.

Matt, 19, a young man from Greater Manchester was rough sleeping after being kicked out of his family home. One day he was approached by a woman while begging. She gave him a drink and cigarettes and offered him a place to stay in return for a share of the money he made begging.

In the apartment Matt was given weed, then later as the woman and her associates encouraged him to escalate his drug use, crack and heroin as well. They told him he would pay it back later. After a couple of weeks, Matt owed them hundreds of pounds.

With no way to pay off the debt, the woman's associates became violent and Matt was told that he would have to [engage in] sex work and sell drugs to pay back the money. He didn't want to but he was scared of what would happen if he didn't and had nowhere else to go.

Matt was forced to sleep with so many men that he lost count. His substance use escalated and he lost all hope of ever being able to pay off the debt. This continued for almost a year until Matt built up enough trust with an outreach worker from a local charity to disclose what had happened to him and who found him an alternative place to live and a place on a drug rehabilitation project.⁵¹



WHAT CAN BE DONE?

Protecting young and vulnerable people from trafficking and slavery is rightly a key concern in drug policy. Yet, far from protecting this vulnerable group, **drug prohibition exposes them to harm:** the trafficking of people for forced labour in the cultivation of drugs; the exploitation of young and vulnerable people in drug supply and distribution networks; and criminalisation leaving individuals more at risk, driving them away from important support mechanisms.

Victims of trafficking and slavery must be supported. **However, the underlying causes for exploitation must also be combated.** To truly combat trafficking in the drug trade, we need to address the trauma, abuse and deprivation which frequently create exposure to it – rather than criminalising people who use drugs and perpetuating cycles of vulnerability. By legally regulating the drug trade, **both the opportunity and profit motive for organised crime will diminish and the scope for trafficking and exploitation will reduce significantly.** By removing criminal penalties for drug possession, and focusing instead on facilitating access to support and treatment where it is needed, cycles of vulnerability can be cut off at the start.

A common concern about legally regulating the drug market is that it will leave criminal groups unaffected, that taking the drug trade away will only lead them to exploit other criminal opportunities. Clearly, the legal regulation of drugs will not end all human exploitation and organised crime. However, while there is likely to be some diversion into other criminal activity, **the illegal drug trade provides unmatched opportunities for profit:** it is one of the engines that drives organised crime globally, so severely reducing that source of income will impact significantly on the ability of crime groups to operate and expand.

Besides counterfeit and pirated goods, no other illegal market comes remotely close to the value of the illegal drug trade, which is estimated at up to **\$650 billion worldwide and around £10 billion in the UK alone**.⁵⁴ According to the NCA the drug trade ‘commonly funds and underpins’ other criminal activities, observing that OCGs involved in human trafficking are often also engaged in the drug trade.⁵⁵

This multi-commodity involvement can occur because the drug trade provides significant profit margins able to generate ‘significant criminal proceeds capable of reinvestment across a range of other threats’.⁵⁶ The licence for much of the exploitation undertaken by OCGs has been obtained through the proceeds of the illegal drug trade; if we remove these proceeds, **there is no similarly lucrative market** to which crime groups can turn to fund their activities.

Legal regulation allows us to combat exploitation the way we do in other industries: by providing strict labour standards, combined with reporting and monitoring procedures. Regulating the production, supply and possession of drugs within a legal framework will also be a vital step in removing the opportunities, and incentives, created by prohibition to exploit vulnerable people as part of a drug trade that is only so enormously lucrative because it is illegal.

Drug prohibition facilitates exploitation. As a growing number of countries explore and implement drug policy reforms, it is time for all governments, international bodies and civil society organisations concerned about human trafficking to recognise that drug prohibition is actively fuelling human exploitation and slavery, and to participate in the growing discussion on alternative approaches that could deliver better outcomes and reduce harms.

Modern slavery has no place in the world. Through effective and innovative drug policy reform we can better protect victims and begin to prevent others from suffering in future.

REFERENCES.

- 1 Dame Carol Black (2020). Review of Drugs: Executive Summary. Home Office.
<https://www.gov.uk/government/publications/review-of-drugs-phase-one-report>
- 2 Source: Freedom of Information requests submitted by Transform. See appendix.
- 3 Home Office (2020). National Referral Mechanism Statistics: UK, End of Year Summary, 2019.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876646/national-referral-mechanism-statistics-uk-end-of-year-summary-2019.pdf
- 4 The Centre for Social Justice and Justice & Care (2020). It Still Happens Here: Fighting Slavery in the 2020s.
<https://www.centreforjustice.org.uk/core/wp-content/uploads/2020/07/It-Still-Happens-Here.pdf>
- 5 UNODC (2008). Organized Crime and its Threat to Security Tackling a disturbing consequence of drug control. p3.
https://www.unodc.org/documents/drug-treatment/CND_09ED_final%20paper.pdf
- 6 UNODC (2019). Ministerial declaration on strengthening our actions at the national, regional and international levels to accelerate the implementation of our joint commitments to address and counter the world drug problem.
https://www.unodc.org/documents/commissions/CND/2019/Ministerial_Declaration.pdf
- 7 Kelly, A. (2019). Enslaved on a British cannabis farm: 'The plants were more valuable than my life'. The Guardian 26 July. <https://www.theguardian.com/news/2019/jul/26/vietnamese-cannabis-farms-children-enslaved>
- 8 Dame Carol Black (2020). Review of Drugs: Executive Summary. Home Office. p11.
<https://www.gov.uk/government/publications/re-view-of-drugs-phase-one-report>

- 9 See: Allain, J. et al (2013). Forced labour's business models and supply chains. Joseph Rowntree Foundation. <https://www.jrf.org.uk/re-port/forced-labour%E2%80%99s-business-models-and-supply-chains>
- 10 See: NCA (2016). National Strategic Assessment of Serious and Organised Crime. p33. <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/353-national-strategic-assessment-of-serious-and-organised-crime-2016/file>
- 11 Silverstone, D. and Brickell, C. (2017). Combating modern slavery experienced by Vietnamese nationals en route to, and within, the UK. <https://www.antislaverycommissioner.co.uk/media/1159/iasc-report-combating-modern-slavery-experience-by-vietname-nationals-en-route-to-and-within-the-uk.pdf>
- 12 See: ECPAT UK, Anti-Slavery International and Pacific Links Foundation (2019). Precarious journeys: Mapping vulnerabilities of victims of trafficking from Vietnam to Europe. p14. <https://www.ecpat.org.uk/precarious-journeys>
- 13 See: Hestia (2019). Underground Lives – Police response to victims of modern slavery: a super-complaint. <https://www.gov.uk/government/publications/police-response-to-victims-of-modern-slavery>
- 14 Kelly, A., Gentleman, A. (2019). Lorry deaths: police face trust problem over appeal to Vietnamese migrants. The Guardian 31 October. <https://www.theguardian.com/world/2019/oct/31/modern-slavery-cannot-be-tackled-if-victims-treated-as-criminals>
- 15 Children do not need to consent to NRM referral.
- 16 See: ECPAT UK, Anti-Slavery International and Pacific Links Foundation (2019). Precarious journeys: Mapping vulnerabilities of victims of trafficking from Vietnam to Europe. <https://www.ecpat.org.uk/precarious-journeys>
- 17 Home Office (2020). National Referral Mechanism Statistics. <https://www.gov.uk/government/collections/national-referral-mechanism-statistics>
- 18 Statistics Canada (2019). A snapshot of federal licensed cannabis producers, 2018. <https://www150.statcan.gc.ca/n1/daily-quotidien/190822/dq190822c-eng.htm>
- 19 Sturrock, R. and Holmes, L. (2015). Running the Risks: The links between gang involvement and young people going missing. Catch 22 and Missing People. <https://www.missingpeople.org.uk/runningtherisks>
- 20 The Children's Society (2019), Counting Lives. p29. <https://www.childrenssociety.org.uk/sites/default/files/counting-lives-report.pdf>
- 21 Children's Commissioner for England (2018). Annual report and accounts 2017-18. p16. <https://www.childrenscommissioner.gov.uk/wp-content/uploads/2018/07/CCO-Annual-Report-and-Accounts-2018.pdf>; National Crime Agency (2020). National Strategic Assessment of Serious and Organised Crime. p32. <https://www.nation-alcimeagency.gov.uk/who-we-are/publications/437-national-strate-gic-assessment-of-serious-and-organised-crime-2020/file>

- 22 Wedlock, E. and Molina, J. (2020). Sowing the Seeds: Children's experience of domestic abuse and criminality. Victims Commissioner. p11. https://s3-eu-west-2.amazonaws.com/victcomm2-prod-storage-119w3o4kq2z48/uploads/2020/03/Sowing-the-Seeds_final_web.pdf
- 23 See: UK Home Office (2020). National referral mechanism guidance: guidance for child first responders (version 2). https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/510091/NRM_-_guidance_for_child_first_responders_v2.0_EXT.PDF
- 24 Woods, N. (2018). Drug wars. Ebury Press
- 25 Children's Commissioner for England (2018). Annual report and accounts 2017-18. p16. <https://www.childrenscommissioner.gov.uk/wp-content/uploads/2018/07/CCO-Annual-Report-and-Accounts-2018.pdf>
- 26 National Crime Agency (2018). Drug Supply, Vulnerability and Harm. <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/257-county-lines-drug-supply-vulnerability-and-harm-2018/file>
- 27 Morgan, N., Shaw, O., Mailley, J. et al. (2020). Trends and drivers of homicide: Main findings. Home Office. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/870188/trends-and-drivers-of-homicide-main-findings-horr113.pdf
- 28 National Crime Agency (2018). Drug Supply, Vulnerability and Harm, <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/257-county-lines-drug-supply-vulnerability-and-harm-2018/file>

- 29 Black, C. (2020). Review of Drugs: Executive Summary. p13 <https://www.gov.uk/government/publications/review-of-drugs-phase-one-report>
- 30 Home Office (2020). Trends and Drivers of Homicide: Main Findings, Research Report 113. p.10. <https://www.gov.uk/government/publications/trends-and-drivers-of-homicide-main-findings>
- 31 Brighton and Hove Independent (2018). Former undercover policeman speaks out over Brighton drug crime. <https://www.brightonandhoveindependent.co.uk/news/crime/former-undercover-police-man-speaks-out-over-brightondrug-crime-1-8374881>
- 32 The Children's Society (2019). Counting Lives. p.48. <https://www.childrenssociety.org.uk/sites/default/files/counting-lives-report.pdf>
- 33 Walawalkar, A. (2019). Child Spies As Young As 15 At Risk Of 'Extreme Brutality'. EachOther 11 June. <https://eachother.org.uk/home-office-endangering-child-spies/>
- 34 Forde, E. and Deith, J. (2019) County lines: Girls under the radar in drug gangs. BBC News 15 October <https://www.bbc.co.uk/news/uk-50045739>
- 35 See: Rolles, S. (2009). After the War on Drugs: Blueprint for Regulation. Transform Drug Policy Foundation. <https://transformdrugs.org/wp-content/uploads/2018/10/Blueprint.pdf>
- 36 The Washington Office on Latin America (Undated). Photo Essays: The Human Cost of Drug Policies in the Americas, Kidnapped and Coerced. https://womenanddrugs.wola.org/photo_essay/kidnapped-and-coerced/

- 37 UNODC (2019). UN World Drug Report: Global Overview of Drug Demand and Supply. p32.
https://wdr.unodc.org/wdr2019/prelaunch/WDR19_Booklet_2_DRUG_DEMAND.pdf
- 38 Penal Reform International, Linklaters LLP and International Drug Policy Consortium (2020). Sentencing of women convicted of drug-related offences.
<https://www.penalreform.org/resource/sentencing-of-women-convicted-of-drug-related-offences/>
- 39 UNODC (2018). UN World Drug Report: Women and Drugs. p. 29.
https://www.unodc.org/wdr2018/prelaunch/WDR18_Booklet_5_WOM-EN.pdf
- 40 Piedad Caicedo, L. (2017). Mujeres en prisión por delitos de drogas: Espejo de las fisuras del desarrollo. p55.
https://www.humanas.org.co/alfa/dat_particular/ar/ar_93254_q_MujeresEnPrision.pdf
- 41 UNODC (2018), UN World Drug Report: Women and Drugs. p. 30.
https://www.unodc.org/wdr2018/prelaunch/WDR18_Booklet_5_WOMEN.pdf
- 42 UNODC (2018), UN World Drug Report: Women and Drugs. p36.
https://www.unodc.org/wdr2018/prelaunch/WDR18_Booklet_5_WOMEN.pdf
- 43 Penal Reform International, Linklaters LLP and International Drug Policy Consortium (2020). Sentencing of women convicted of drug-related offences. p7.
<https://www.penalreform.org/resource/sentencing-of-women-convicted-of-drug-related-offences/>

- 44 Washington Office on Latin America (2010). Drogas y cárceles en México. <https://vimeo.com/13218132>
- 45 Grierson, J. (2019). The end of the county line: how drug users are exploited by gangs. The Guardian 18 September.
<https://www.theguardian.com/uk-news/2019/sep/18/the-end-of-the-county-line-how-drug-users-are-exploited-by-gangs>
- 46 See: Wedlock, E. and Molina, J. (2020). Sowing the Seeds: Children's experience of domestic abuse and criminality. Victims Commissioner. <https://victimscommissioner.org.uk/published-reviews/sowing-the-seeds-childrens-experience-of-domestic-abuse-and-criminality/>
- 47 The Salvation Army, (2018). A few doors down: the links between substance misuse and modern slavery.
https://issuu.com/salvationarmyuk/docs/a_few_doors_down_-_the_links_between?e=5764755/63417485;
See also National Crime Agency (2019). National Strategic Assessment of Serious and Organised Crime. p18.
<https://nationalcrimeagency.gov.uk/who-we-are/publications/296-national-strategic-assessment-of-serious-organised-crime-2019/file>
- 48 National Crime Agency (2019). County Lines Drug Supply, Vulnerability and Harm 2018. Para 24.
<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/257-county-lines-drug-supply-vulnerability-and-harm-2018/file>
- 49 One25 (Undated). Zara's story. <https://one25.org.uk/stories/zara/#storyTitle>

- 50 NCA (2018). National Strategic Assessment of Serious and Organised Crime. p29, 31.
<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/173-national-strategic-assessment-of-serious-and-organised-crime-2018/file>
- 51 Stop the Traffik (2020). Research Case Study – Illustrating manipulation of substance needs as a control method and close links between exploitation, homelessness and the drug trade. Accessible here:
<https://www.stopthetraffik.org/resources/nhs-hotels-homelessness-modern-slavery-training/>
- 52 See: Transform Drug Policy Foundation. Regulating drugs. *<https://transformdrugs.org/regulating-drugs/>*
- 53 Clarkson, A. (2020). Inside the Middlesbrough clinic where heroin users get a ‘last chance’. BBC News.
<https://www.bbc.co.uk/news/uk-england-tees-51587092>; Transform Drug Policy Foundation (2019). Hitting Heroin and Crack Markets: Funding Heroin Assisted Treatment Through Increased Proceeds of Crime Act Money.
<https://transform-drugs.org/wp-content/uploads/2019/11/POCA-Funding-for-HAT.pdf>
- 54 Tharoor, A. (2017). Report: Global Drug Trafficking Market Worth Half a Trillion Dollars. Talking Drugs, 21 April.
<https://www.talkingdrugs.org/report-global-illegal-drug-trade-valued-at-around-half-a-trillion-dollars>;
Black, C. (2020). Review of Drugs: Executive Summary.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/868438/2SummaryPhaseOne+foreword200219.pdf

- 55 NCA (2016). National Strategic Assessment of Serious and Organised Crime. p32.
<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/353-national-strategic-assessment-of-serious-and-organised-crime-2016/file>; NCA (2018). National Strategic Assessment of Serious and Organised Crime. p11, 13. *<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/173-national-strategic-assessment-of-serious-and-organised-crime-2018/file>*; NCA (2020). National Strategic Assessment of Serious and Organised Crime. p10. *<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/437-national-strategic-assessment-of-serious-and-organised-crime-2020/file>*
- 56 NCA (2016). National Strategic Assessment of Serious and Organised Crime. p6, 32.
<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/353-national-strategic-assessment-of-serious-and-organised-crime-2016/file>

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CONTACTS.

Transform Drug Policy Foundation is a charity working to promote public health, social justice and human rights through drug policy reform. We believe the legal regulation of drugs is essential to achieving these goals.

We collaborate, engage and work with policymakers, charities and funders across the health, crime and social policy sectors. We also work directly with activists who support our aims and families who wish to change attitudes towards regulation in the UK.

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Anyone's Child is a campaign of Transform Drug Policy Foundation, working with families affected by the drug war, who call for the legal regulation of drugs.

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