

Title	Criminal exploitation and vulnerability in drug markets: A six-nation comparison of its recognition in international policy discourses and criminal justice systems
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Publication date	2026-03-22
Original Citation	Søgaard, T F, Andell, P, Coomber, R, Chomczyński, P, Bowden, M, Gundhus, H O I, Frąckowiak, P, Szykut, M, Tollin, K, Windle, J, Löfstrand, C H & Seal, M 2026, 'Criminal exploitation and vulnerability in drug markets: A six-nation comparison of its recognition in international policy discourses and criminal justice systems', European Journal of Criminology, pp. 1-22. https://doi.org/10.1177/14773708261427649
Type of publication	Article (Peer reviewed)
Link to publisher's version	10.1177/14773708261427649
Download date	2026-08-20 08:55:25
Item downloaded from	https://hdl.handle.net/10468/18663



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Criminal exploitation and vulnerability in drug markets: A six-nation comparison of its recognition in international policy discourses and criminal justice systems

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Abstract

In the UK, the recent “turn to vulnerability” in safeguarding and the criminal justice system has meant an increasing recognition that many children and vulnerable adults committing crimes, such as drug dealing, are in fact victims of criminal exploitation involving manipulation and coercion. This recognition is fairly recent, and the visibility of exploited children and adults is impacting how they are dealt with and safeguarded. In other parts of Europe there is also burgeoning recognition of Drug Market-related Criminal Exploitation (DMCE) manifesting in various forms. In most European states, DMCE is, however, as of yet, not as ‘visible’ or as accommodated by the criminal justice and safeguarding systems that process exploited children and adults, and still often see these as criminals first and exploited second. Drawing on an international research network, we provide the first assessment of DMCE as an internationally relevant concept and how DMCE victims are situated across various spaces. Data derives from a comparative research project conducted in Denmark, Republic of Ireland, Norway, Poland, Sweden and the UK supported by expert reflection on research evidence and analysis of criminal justice processing, policy documents and media reporting in each context. Findings show that DMCE is present in all contexts, that its degree of socio-legal visibility varies and that “offender” versus “victim” narratives continue to dominate the extent to which DMCE victims are accommodated as such.

Keywords

Drug markets; Criminal Exploitation; Policy framing; Criminal Justice; Europe; Vulnerability

Introduction

In Europe and elsewhere, illicit drug markets have long been characterised by unequal and sometimes exploitative relationships between those who organise and those who undertake subordinate tasks such as cultivating, transporting, storing, packing and retailing drugs. Research from European countries, including Ireland (Hourigan, 2011; Naughton et al., 2022; Sheehan et al., 2024), Sweden (Tollin et al., 2023), Poland (Pająk, 2020), Denmark (Søgaard et al., 2021), Norway (Lidén, 2022; Tyldum et al., 2015) and the United Kingdom (UK), show that exploited drug labourers are sometimes minors and vulnerable adults. The latter, includes individuals with drug dependency, disabilities, mental health issues and elderly people (Coomber and Moyle, 2018; Andell and Pitts, 2018; Moyle, 2019; Windle et al., 2020; McLean et al., 2020; Spicer, 2024). Seasoned criminals often exploit such groups to maximise profits and to shield themselves from prosecution.

Particularly in the UK, the exploitation and harm of children and other vulnerable people, involved in the supply of illegal drugs, has recently garnered much media attention and public concern. Key to this is the emergence of a new County Lines drug supply model, first formally recognised by the police in 2015 (NCA, 2015) but evident in research from around 2010 (Coomber and Moyle 2012). This supply model is said to have made exploitation a systemic feature of retail-level drug distribution (Moyle, 2019, Windle et al., 2020). In this context, there has been a shift in recent years in UK policy whereby concerns with County Lines drug supply has been increasingly linked with modern slavery (Koch, 2024). This has coincided with a shift in the policing of vulnerable drug supply-related labourers away from simple criminalisation towards protection and safeguarding (Firmin, 2020; Marshall et al., 2024).

Internationally, modern slavery has been on the humanitarian agenda since the early 2000s (Segrave et al., 2017) and being exploited for “use in illicit or criminal activities” was identified

as a form of human trafficking by UNODC (2009) and under EU Directive 2011/36/EU. In 2015, the British parliament passed a new Modern Slavery Act which according to Koch (2024) represented an unprecedented piece of legislation. On the one hand, the Modern Slavery Act creates a prosecution tool for slavery, servitude, and human trafficking offences, and on the other it provides a potential defence for certain offences, including for drug offences, that have been committed by victims of exploitation. While the passing of the Modern Slavery Act was initially based on a political concern with victims of human trafficking across national borders, especially victimised female sex workers, and trafficked minors, from the Global South and eastern Europe, the modern slavery agenda was later domesticated also to include locally based British nationals said to have been enslaved as drug labourers by adult domestic managers of Drug County lines (Koch, 2024). Within this modern slavery discourse, minors and other vulnerable drug labourers are reframed from being simply “criminals” to potential “victims” and “slaves”, who no longer ‘deserve’ punishment, but need help and safeguarding. The modern slavery discourse has been criticised for exacerbating traditional demonising depictions of seasoned drug suppliers (Coomber, 2006), by reframing these from “criminals” to “slave masters” (Koch, 2024) and hence disregarding that some gang members are themselves under-18 or not much older than the children they are accused of exploiting (Alexandrescu and Spicer, 2023). Though the term “County Lines drug supply” and the use of modern slavery discourses remain debated (Densley et al., 2023), the Modern Slavery Act is increasingly used as a defence to drug supply charges (Koch, 2024), and drug-involved youth, many of whom are British nationals, are increasingly referred to the National Referral Mechanism, tasked with identifying victims of criminal exploitation and providing social interventions appropriate to conferred victimhood. From 2013, UK national referrals have risen from 90 to 4,299 in 2023 (Home Office, 2024). Relatedly, there has been an increase in prosecutors’ use of human trafficking charges to deter and punish adults who recruit and exploit minors and other vulnerable people as drug labourers (Koch, 2024).

While the proliferation of the County Lines supply model might be unique to the UK, research into the exploitative features of this model, and especially the broadened understanding of the exploitation of victims, beyond the traditional focus on iconic human trafficking victims (i.e. vulnerable individuals from the Global South or Eastern Europe), to also include criminally exploited domestic citizens and permanent-residence-permits-holders, has in recent years spurred wider European interest. Not only does this broadened “exploitation lens” make new victims visible, but it also suggests that the problem of DMCE might be much bigger in European countries than hitherto acknowledged. As an indication of the growing European attentiveness to the problem of what might be termed “domestic exploitation for crime”, The EMCDDA and Europol (2024), have recently stated that criminal networks operating in the European drug market are increasingly recruiting and exploiting juveniles and vulnerable populations, and as such this problem should be a priority for governments and law enforcement agencies (EUDA, 2024).

Though exploitation of children and other vulnerable people for serious drug crimes is likely present, and seemingly on the rise, in many European countries, and despite broader European calls for stronger protections of domestic vulnerable groups against exploitation, as of yet, there is little to indicate a straightforward “policy transfer” (Newburn et al., 2018) of current UK problem framings and regulatory tactics across European boundaries. Rather, the way this problem is discursively framed in public and political debates and addressed by criminal justice systems differs. This article is the first to assess how potential victims of drug market-related criminal exploitation (DMCE) are situated discursively in public and political debates, and in criminal justice processing systems across various European spaces. We argue that a comparative approach is useful both for exploring the underpinning logics that might explain national variations in dominant framings of domestic DMCE-victimhood as policy-problems, and for critically examining how different problematisations condition the possibility for the

recognition of, and for provision of help to domestic DMCE-victims across European spaces. While it is beyond the scope of our study to conduct an exhaustive analysis, we aim to provide a basis that will inform and inspire future research into how national/local political economies, policy discourses, cultural dispositions and penal traditions shape country-specific approaches to the general and cross-European DMCE-problem.

We define DMCE as when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, deceive or entrap a person in(to) production- or supply-related drug crime. We delimit our focus only to include exploitation for drug crimes above the level of personal use and possession, such as drug production, sales, smuggling, transportation or storage of larger quantities. We acknowledge that DMCE can blend into or overlap with exploitation for other types of crime but focus only on exploitation for serious drug crime. We focus on drug crime, as this is a major source of income for organised crime groups (Reuter, 2014), and, when reaching a certain scale, also a very labour-intensive type of crime hence creating an ongoing incentive for the involvement and exploitation of minors and vulnerable adults as drug labourers. A crucial step in countering this situation, is to become reflexive of how different policy problematisations have implications for how the DMCE-problem is recognised and addressed. Data derives from a coordinated comparative research project undertaken in the Republic of Ireland, Norway, Poland, Sweden, Denmark and the UK. We provide an overview of research on DMCE in these countries and insights into how DMCE is framed as a policy problem, what laws are used to prosecute DMCE offenders, to what extent DMCE victimhood is acknowledged in legal frameworks and sentencing practices, and how DMCE is sought managed in the different countries. We discuss our overall findings and point to policy recommendations.

DMCE and the offender-victim overlap

Criminal exploitation poses dangers to individuals' physical, psychological, and social well-being, exposing them to emotional abuse, physical harm, and a criminal record, which for children can have long-term impacts on their development, education and employment (Baidawi et al., 2020). According to critical victimology, however, becoming a victim is dependent on more than simply experiencing harm and abuse. It also requires the social recognition of one's status as a victim (Strobl, 2004). In an international drug policy environment predicated on the criminalisation of drug supply, access to a victim status among people implicated in such offences, has traditionally been hindered by a normative dichotomisation of "victim" and "offender" identities (Marshall et al., 2024). With this culture of criminalisation, individuals violating drug laws are predominantly or solely seen as offenders. Furthermore, as noted by Moyle (2019) and Windle et al. (2020), a barrier to being ascribed victimhood for exploited drug offenders is that many do not comply with traditional conceptions of the "ideal victim", meaning someone passive, weak, innocent and with no pre-existing relations with perpetrators (Christie, 1986).

Research shows that exploited minors and other vulnerable people often have pre-existing relations with their exploiters (McLean et al., 2020). Some, initially, also actively and consensually go along with their recruiter, due to the prospects of profit, easy access to drugs or to pay off drug debt, only to be coerced at later stages. Others are groomed, coerced or forced to participate in serious drug crime (Coomber and Moyle, 2018), but nevertheless commonly reject the victim label, due to loyalty to their exploiter or because the victim label conflicts with their personal/masculine identity (Robinson et al., 2019). Furthermore, the boundary between exploiter and exploited is not always clear. Minors, who adult criminals recruit and exploit, are, sometimes themselves involved in recruiting other children into criminal exploitation networks (McLean et al., 2020; Tollin et al., 2023). To accommodate the complex

reality of DMCE, researchers have suggested that exploited minors and vulnerable adults might best be conceptualised as “awkward”, “complex” or “agentic” victims (McLean et al., 2020; Shaw, 2024).

The recognition of DMCE as a societal problem and of DMCE victimhood is a social, and sometimes contested process which occurs both at a micro-level, through interactions between potential victims and those with authority to affirm victim status (Marshall et al., 2024), but also – as we demonstrate in this article – at a macro-level through policy discourses and legal frameworks which, in part, structure the conditions of possibility for recognising (new) types of victims.

Analytical framework

Recognition is a form of social visibility (Coomber, 2024). To explore how the recognition, unrecognition or selected recognition of DMCE victimhood is shaped by policy discourses and legal frameworks across European spaces, we draw analytic inspiration from framing analysis. According to Rein and Schön (1993), “framing” can be defined as “a way of selecting, organising, interpreting, and making sense of a complex reality to provide guideposts for knowing, analysing, persuading, and acting” (p. 146). From this perspective, policies are not straightforward responses to pre-existing problems “out there”. Rather, the complementary processes of naming and framing make certain phenomena or groups visible as relevant policy problems, define what is seen as problematic about an issue/group, set a cause for action, while simultaneously silencing or rendering invisible other problems, aspects or (victim) groups. Since policy frames are embedded in culture(s), often representing taken-for-granted beliefs and assumptions (Thom and McGregor, 2020), certain frames can be more dominant in some national contexts rather than others. We use this perspective to explore how DMCE is identified and framed as particular but also different policy problems in various European contexts.

Methods

No prior studies have provided a comparative analysis of the place of DMCE in European criminal justice systems. One reason might be that DMCE practices may not always be defined as such or may be only recognised informally, with little explicit discussion of its parameters or characteristics in official documents.

The data presented in this article are derived from a coordinated comparative research project undertaken by an established international research network – the European Research Consortium on Criminal Exploitation (ERCCE) – with participating researchers working in the DMCE space in the UK, Ireland, Poland, Sweden, Norway, and Denmark. The same methodological approach was used in all countries. This approach drew inspiration from a prior comparative study investigating the recognition of “social drug supply” in international criminal justice systems (Coomber et al., 2018). Data collection drew on individual and team research stemming from the country in question, supported by expert reflection on research evidence and analysis of policy documents, sentencing- and media reporting. In each country, researchers were required to respond to a set of fixed questions regarding the recognition, presence and nature of DMCE in their context. This included providing an overview of country-specific research on DMCE; to what extent DMCE is identified as an issue of public concern; how DMCE is discursively framed as a policy problem; what laws are used to prosecute DMCE offenders; and to what extent DMCE victimhood is acknowledged in legal frameworks and sentencing practices. Finally, contributors were requested to comment on how DMCE is dealt with through multiagency collaboration, social services and diversion schemes. In operationalising the concept of DMCE, researchers were asked to include material (e.g. research, media reports, policy documents) that in English or in the respective national languages addressed or made use of the concepts “exploitation”, “grooming”, “debt bondage”,

“manipulation”, “recruitment”, “coercion” – or equivalent national language terms – in relation to supply-related drug crime, and/or focused on use of “intimidation”, “coercion” and “violence” as means of enrolling and/or entrapping a person in supply-related drug crime. Using a structured approach, a thematic synthesis was employed to code and group findings from each country’s research, leading to recurring patterns and differences identified.

The results section is organised according to themes instead of providing country profiles. The thematic structure was chosen, as this offers a more effective means of presenting broad European trends and tracking how evident and varied different countries’ accommodation of DMCE is. Collecting data in this way is not without its challenges and, we would highlight that this is an indicative rather than an exhaustive exercise. In some contexts, it is still unclear even to scholars interested in DMCE, how far policy and sentencing guidelines are adopted in practice. Our study is limited to the scope of our network, and because DMCE is likely to manifest differently we do not comment on the situation in other countries.

Results

The result section is divided into five sections: the *first* focuses on how DMCE is recognised in European research, the *second* on emerging research themes, the *third* how DMCE is framed as a policy problem across different countries, the *fourth* focuses on the legislative frameworks used to address the DMCE problem, including the extent to which DMCE victimhood is acknowledged in laws and sentencing practices, and the *fifth* outlines how DMCE is sought dealt with through multiagency collaboration and novel police approaches.

Recognition of DMCE in European research

National variation exists regarding research on DMCE. In some countries, broader crime

studies have briefly touched upon DMCE, whilst other countries have a significant amount of empirical research and have research that developed DMCE conceptually. Table 1 provides an overview of the situation in the countries reported on here.

TABLE 1

In the UK, DMCE is high on the research agenda. This includes studies exploring the links between changing criminal market structures and increases in DMCE (Coomber and Moyle, 2018; Andell, 2019, Windle et al., 2020), and studies exploring the recruitment techniques used by exploiters (Robinson et al., 2019; Windle et al., 2020; McLean et al., 2020), and offender-victim complexities (Moyle, 2019; McLean et al., 2020; Densley et al., 2023). This research shares a focus on DMCE as an embedded practice – driven by push factors (e.g. economic hardship, drug dependency, trauma, migration-related precarity) and pull factors (e.g. the excesses of consumerism, manipulation, coercion and debt bondage) –, and has drawn inspiration from research on human trafficking to develop DMCE as well as DMCE victimhood conceptually. While most studies focus on DMCE of children and youth, some studies also focus on DMCE of vulnerable adults (Gray, 2023; Spicer, 2024). More recently, UK research has started to focus on the challenges faced by criminal justice and welfare systems in addressing the DMCE problem, especially regarding identifying and protecting DMCE victims (Shaw, 2024; Marshall et al., 2024).

Denmark is one of the few other countries where research specifically focusing on DMCE has been conducted. In 2020, a trendspotter-study suggested that DMCE is on the rise due to the Danish gang landscape becoming more fragmented and the drug market more competitive (Søgaard et al., 2021). The issue of DMCE has also been touched upon in reports on unaccompanied minors and asylum-seekers (Københavns Kommune, 2017), in reports on

youth recruitment into gangs (Pedersen 2014), and by research on street cultures (Kalkan, 2018).

Research on DMCE is limited but emerging in Sweden. While studies exist on the involvement of children and youth in “organised crime”, this research mainly focuses on the role of personal incentives and street culture socialisation in facilitating crime involvement, rather than on DMCE (e.g. Gerell et al., 2020). A recent study, however, indicates that there is a high demand for children and youth in the Swedish drug economy, and that children are groomed or forced into drug distribution networks (Tollin et al., 2023). Research also indicates that the increase of gun violence in Sweden is related to an intensified exploitation of children (Angerbrandt et al., 2024).

While often not a primary focus, research on youth crime and drug markets in Ireland has uncovered DMCE. This research revealed that criminal networks often operate through extended kin relations (Naughton et al., 2022) and sometimes act as an alternative family, that vulnerable young people turn to, to have their basic needs met (Hourigan, 2011; Cambridge et al., 2022; Sheehan et al., 2024). Drug debts and violence can also play a central role when youth engage in drug markets (Bowden, 2019; McCreery et al., 2021), and studies point to the paradox that though many youth are ‘pushed’ into drug crime networks due to social marginalisation, many nevertheless draw a neoliberal discourse, and claim that their criminal involvement is based on an individual “choice” (Sheehan et al., 2024).

In Poland, there is little research on DMCE. While much research exists on youth crime and crime careers (e.g. Klaus et al., 2023), the issue of DMCE remains underexplored. Research by Kurzępa (2010), however, shows a link between prostitution and DMCE especially near the Western border, and research also indicates that minors, who live in deprived neighbourhoods are vulnerable to DMCE (Pękala et al., 2021).

In Norway, research on DMCE is limited. In fact, Skilbrei and Holmström (2021) argue that given traditional linkages between notions of exploitation, human trafficking policies and prostitution, there has been a tendency in Norway to overlook other forms of exploitation. Research that does include a focus on DMCE has, inspired by a traditional human trafficking policy lens, mainly focused on exploitation of foreign nationals, such as unaccompanied minors (e.g. Tyldum et al., 2015; Lidén, 2022). Inspired by international studies arguing for a broadened understating of DMCE that also includes a focus on national citizens, a recent report by Vollebæk (2024), however, indicates that exploitation of minors and youth for drug crime might be a bigger problem in Norway than hitherto assumed.

Emerging DMCE themes

DMCE and gender

Drug markets are often described as gender stratified and hierarchical. While acknowledging that women in drug markets also display (structured) agency, recent studies have begun to explore the gendered dimension of DMCE (Moyle, 2019; Robinson et al., 2019; McLean et al., 2020; Havard et al., 2023; Densley et al., 2023). Research from the UK and Sweden shows that women are commonly recruited as low-level drug labourers because they are believed to fly under the police radar, although women sometimes also have positions of power, and, some also contribute to the exploitation of others (Robinson et al., 2019; Spicer, 2024; Havard et al., 2023; Densley et al., 2023; Tollin et al., 2025). Vulnerable females are sometimes subject to gendered recruitment strategies, where male dealers create the impression of a romantic relationship (the “boyfriend model”), as means of manipulating them to work as drug runners or to use their flats to store or sell drugs (Moyle, 2019; Tollin et al., 2025). Exploited females are also exposed to gendered risks of victimisation, such as sexual abuse, rape, or being forced into sex work (Robinson et al., 2019; Havard et al., 2023).

Gendered dynamics also shape men's involvement in DMCE-relationships, and their perceptions of DMCE-victimhood. Barker et al. (2025), for instance, describe how young men's sense of disenfranchisement and emasculation, stemming from failures in the educational system and the labour market, can leave some open to DMCE recruitment, due to the allure of traditional macho characteristics associate with drug selling. Relatedly, experiences of economic hardship and men's sense of duty to fulfil male roles such as "the breadwinner", and being able "to provide for oneself", i.e. not be a burden to the family, can also be drivers into drug crime and DMCE (Marshall, 2022), as can a lack of responsible male role models, a search for male camaraderie, and younger boys' admiration of and desire to impress older male criminals. Given that the victim label is often associated with failed masculinity (Marshall, 2022), exploited young men often reject the victim identity, by stating that exploitation only happens to others (Robinson et al., 2019), and by emphasising that they made (rational) choices to let themselves be used by senior drug criminals to generate a personal income (Robinson et al., 2019), or to provide for others, such as family members (Marshall, 2022). A focus on gender, is hence useful for exploring the ways in which some men seek to claim the qualities of traditional masculinity, such as agency, control and autonomy, while being exploited by others. Lastly, research also indicates that young men's performance of street masculinity can be a barrier for being recognised as DMCE-victims by social workers and the criminal justice system (Shaw, 2024; Marshall et al., 2024).

DMCE and the digitalisation of society

Recently, researchers have started to explore intersections between DMCE and the increased digitalisation of society. Havard et al. (2023) and Andell (2023), for instance, describe how UK gangs use social media to seduce and recruit young girls as drug labourers. At times, gang members persuade females to film sexual acts or send nude photographs, which are later used

as collateral to coerce them into and to hold them hostage in drug trading (Storrod and Densley, 2017). Research from Denmark also shows that drug sales groups on social media sometimes also function as job billboards, where drug dealers post job adverts that they are seeking individuals willing to work as drug runners, to store drugs or to make their bank accounts available (Korshøj and Søgaard, 2024). Strikingly, and reflecting a general professionalisation of marketing techniques in retail drug markets (Søgaard and Salinas, 2025), many illegal job adverts imitate legal job adverts both in their language and aesthetics. Social media adverts for drug runners, are, for instance, often written in a friendly and welcoming tone and some criminal advertisers state that they are looking for a person, who is responsible, who wants a flexible job with a good salary, and who wants to be part of a great team with nice colleagues. Some adverts even state that only serious applications will be considered (Korshøj, 2025). While some job adverts are for long-time employment others are for one-off jobs. Seasoned criminals' increased use of illegal job adverts on popular youth social media, that aesthetically and linguistically imitates legal job adverts, can be seen as a new form of cyber grooming that might contribute to an increased normalisation and "gigification" of youth engagement in serious drug crime. At the more extreme end, Swedish newspapers have described how encrypted online forums are today key to the grooming and hiring of minors as contract killers by rival drug gangs in Sweden and in neighbouring Denmark (Barrett, 2024).

DMCE as societal concern: Degree and framing of the problem

Recognition of DMCE as an issue of public concern

While DMCE is likely to be present in most European countries, it varies to what extent DMCE is recognised as a problem of public concern. At one end of the continuum is the UK, where DMCE of minors has become a matter of massive public concern both via the publicity surrounding high-profile court cases (Shaw 2024), and because the intensive media interest in

this issue has made DMCE of minors “newsworthy” (Coomber and Moyle, 2018). At the other end of the continuum is Poland, where DMCE has caught little public attention. Here public debate is more concerned with how to prevent youth crime generally, and how to protect minors from sexual exploitation.

Like the situation in the UK prior to 2015, in Norway, public concerns about DMCE have largely focused on youth of foreign nationality, especially unaccompanied minors and asylum seekers, but DMCE is generally not an issue that has attracted much political or media attention. Only recently, and partly due to growing concerns that the Swedish ‘gang problem’ might spread to Norway, some professionals, involved in prevention of youth crime and violence, have started publicly to suggest that exploitation for (drug) crime of a broader category of youth, including Norwegian nationals, should be a political priority (Vollebæk, 2024).

In Ireland and Denmark, DMCE of a broad category of minors by criminal gangs and adult criminal entrepreneurs is an issue of growing public interest. In Sweden, where public shootings between rival gangs have become an issue of intense public concern, hardly a day goes by without media stories about criminal exploitation of children. The focus of these news stories is mainly on drug gang members’ recruitment of minors for violent and deadly attacks, and less so on exploitation of minors for drug crimes.

In most of the involved countries, public concerns mainly revolve around DMCE of minors and young people, though in the UK, and to a lesser extent in Denmark, public debates also focus on DMCE of vulnerable adults.

Framing youth involvement in serious drug crime as particular types of problems

Given that, in most of the countries, particularly minors and young people have figured centrally in public concerns about DMCE, national differences in the understanding of the DMCE-problem are also most evident when looking at how the problem of youth involvement in serious drug crime has been framed in public discourses. In the following, we outline four

key discursive framings and show how different framings often co-exist, but also how the prevalence and combination of specific frames vary.

In an international drug policy environment predicated on a culture of criminalisation, it is hardly surprising that in all of the participating countries public debates have traditionally been dominated by a *punishment-centred framing* that depicts individuals (including young people) involved in serious drug crime as offenders and rational deviants who deserve punishment, and with only themselves to blame for experienced harms while involved in crime (Densley et al., 2023). This type of framing is rooted in a binary understanding of “victim” and “offender” identities and fuelled by tough-on-crime-politics. For a long time, this framing dominated politics in the UK, Poland and Ireland, and in the past decades it has also grown in prominence in Sweden, Denmark and Norway. In Sweden, for instance, up until recently the media tended to depict young people involved in gang activities as cruel “child soldiers” who inflicted harm upon others (Löfstrand, 2025). From the early 2000s, Denmark also embarked on a more punitive path in terms of youth justice approaches and drug policies, with the intention of communicating to youth that “all actions have consequences” and that “youth need to think twice before committing crime” (Houborg et al., 2020; Henriksen et al., 2024). A similar move in youth justice is also evident in Sweden (Hedlund et al., 2024).

The second is a *welfare-oriented framing*, which emphasises that young peoples’ involvement in drug crime is caused and shaped by structural forces beyond their control, including socio-economic marginalisation, austerity politics and growing up in dysfunctional families. This framing has long been dominant in Nordic welfare states such as Norway, Sweden and Denmark (Egge and Gundhus, 2012) but has in recent years also gained traction in the UK, resulting in the emergence of concepts such as public health criminology (Marshall et al., 2024) and in concerns with contextual safeguarding of youth (Firmin, 2020).

The third discursive framing depicts youth involvement in serious drug crime as a result of

them being *victims of recruitment* by seasoned adult criminals. Within this framing, young people are constructed as naive, easily seducible, as lacking agency, as forced into crime by others, and hence as in need of what might be called “preventive protection” by authorities and social services. This framing is today dominant in Denmark and Sweden, prevalent in Norway, Ireland and the UK, and growing in importance in Poland. While this framing recognises that (some) minors are victims of DMCE, importantly it constructs this problem as predominantly a crime prevention problem. In Denmark, this framing, was for instance articulated in the most recent anti-gang-policy by the government, which emphasised the importance of early crime prevention and the responsibility of authorities and social services in safeguarding young people from the recruitment efforts of seasoned criminals, while at the same time pointing out that the youth who do engage in crime (e.g. become recruited) should face punitive consequences (Danish Government, 2023). Similarly, the Swedish government issued an anti-gang policy in 2023, which both emphasised prevention of exploitation of children and youth, and instituted a more punitive approach towards gang- and crime-involved youth (Government of Sweden, 2023). Besides exemplifying the co-existences and sometimes co-entanglement of different discursive framings (i.e. victims-of-recruitment and punishment-centred), the above illustrates how the (partial) recognition of DMCE-victimhood in some contexts is still underpinned and structured by a traditional victim-offender dichotomy.

The fourth framing identifies (some) young people involved in serious drug crime as *victims of human trafficking and harm*. This framing is today prevalent in the UK and has to a smaller extent spread to Ireland but is, largely absent in Sweden, Denmark, Poland and Norway aside from when the focus is narrowly on exploitation of foreign nationals from the Global South or Eastern Europe. As aforementioned, in the UK, the prevalent use of this framing has been fuelled by a broader modern slavery agenda, and it constructs DMCE of domestic minors as a (new) form of human trafficking. While this framing is also being concerned with the problem

of initial recruitment of youth into drug crime (like the victim-of-recruitment-framing), it stands out by including a key focus on the physical and psychological harms experienced by recruited and “enslaved” minors. This framing, for instance, borrows key concepts from psychology and public health, such as “child exploitation”, “vulnerability” and “trauma” (Moyle, 2019; Naughton et al., 2022; Densley et al., 2023), thus constructing recruited domestic youth as victims of inflicted harm, and as subjects who are in need of psychological support and safeguarding initiatives, similar to those customarily reserved for ‘traditional’ victims of human trafficking (e.g. vulnerable foreign nationals).

While it is difficult to determine the exact causal relations between discursive framings and national legislations, it is noteworthy, as will be outlined below, that national differences in the prevalence of framings that constructs domestic DMCE victims as respectively “victims of recruitment” or “victims of harm”, seem to correspond with the legislative framework, used in different countries to target DMCE, and the extent to which these provide legal opportunities for recognition of victimhood status.

Legislative frameworks and practices

All the participating countries have ratified the UN Palermo Protocol of 2000, which introduced a paradigm of prevention, victim protection, and prosecution efforts to combat human trafficking. In all the countries, except for the UK, human trafficking laws and protective measures, however, are in practice almost solely applied in cases involving vulnerable non-citizens from the Global South or Eastern Europe, why most countries only have very few officially registered yearly human trafficking cases involving minors and youth.

In several of the participating countries, however, growing public concerns with DMCE has in recent years resulted in legislative changes. Importantly, different countries seem to follow one of two paths. While some have started to apply existing human trafficking legislations to

new domains (i.e. to DMCE of domestic citizens), others have implemented new legislative statutes to address the problem of DMCE.

In the UK, recent representations of children involved in County lines as ‘deserving’ victims (of harm), rather than as deviant agents, has created an impetus for new legislative practices (Shaw, 2024), involving a growing use of the Modern Slavery Act in cases of suspected DMCE. As aforementioned, the British Modern Slavery Act of 2015 was initially meant to address the problem of human trafficking across national borders but has since also been used by defence lawyers and prosecutors in cases involving suspected DMCE of British nationals. While the former draw on the Modern Slavery Act to get alleged victims of DMCE-related harm acquitted from punishment, the later use human trafficking charges to deter and punish adult criminals, who are said to recruit and exploit minors and other vulnerable people as drug labourers (Koch, 2024).

In the past, prosecutors in Sweden have also tried to use human trafficking laws to target forced criminal involvement of Swedish nationals but failed to succeed in court. Instead, and possibly informed by discourses that frame the problem of youth involvement in serious drug crime as “preventive recruitment problem”, Sweden has followed a broader international trend where more countries are implementing anti-recruitment statutes. Internationally, use of anti-recruitment statutes, as means of deterring adults from recruiting minors to drug- and other serious crimes, is not a new phenomenon. While not criminalised at a federal level, many US states, for instance, have for years had so-called “anti-gang recruitment statutes” (Finelli, 2019). More recently, countries such as Australia (2017), Sweden (2023), Ireland (2024) and Denmark (2024) have issued legislative changes which constructs the act of recruiting a minor for crime as a new offence category, in effect making it an offence for an adult to compel, coerce, direct, deceive, induce, invite, pay, advice, transfer property to (e.g. a drug sales phone or a scale for weighing drugs) or aid individuals under the age of 18 in the commence of crime

(Government of Ireland, 2024; Hofverberg, 2023; Danish Ministry of Justice, 2024). Norway is currently considering imposing a similar legislative measure (Brekke, 2025). In the different countries, legal frameworks differ regarding which specific acts that count as a recruitment activity, for which types of crime (recruitment for all or only specific crimes), for whom (all adults or only certain adult recruiters) the new anti-recruitment statutes apply, and maximum penalties for recruitment offences also varies, ranging from 4 to 5 years of imprisonment.

While the UK Modern Slavery Act, includes a statutory defence, involving, social support, punishment reduction or complete exemption, for individuals, who have been identified by the court as victims of human trafficking harms, including DMCE, this is typically not the case with anti-recruitment statutes. In Denmark, for instance, attempts and acts to recruit a minor for crime is legally defined as an offence against the state, and not as an offence against the recruited child. The new anti-recruitment statute thus does not include legal options for exempting recruited/exploited minors from legal or extra-legal punishment. This is also the case in Ireland and Sweden where attempts to govern DMCE through anti-recruitment statutes reflects a governmental concern with deterring and punishing perpetrators of DMCE – i.e. preventing recruitment of minors – but does not include the same legal recognition of victimhood and experiences of harm by recruited minors, as enabled by the UK Modern Slavery Act. Following the broader European trend, the UK Government, however, currently also considers developing a specific criminal offence of child criminal exploitation (Gov.UK, 2025).

In all the participating countries, however, drug offenders under age 18 are generally sentenced more leniently. Individuals under the age of 18 are typically ascribed a status as “generally vulnerable”, why sentences for this group are often moderated and aimed at facilitating reform and social reintegration (Egge and Gundhus 2012). Like in Denmark, this can include being sentenced to mandatory participation in “improvement programmes”, where

young offenders are assigned a mentor and required to participate in a drug treatment program and abide to an evening home curfew (Henriksen et al., 2024). In Danish courts, prosecuted adults might also claim to be victims of DMCE, but such claims rarely carry much weight in sentences. Overall, however, the trend in many of the participating countries seems to be that deterrence-oriented anti-recruitment legislation is coupled with diversion approaches, the latter however taking an increasingly punitive form and reflecting a growing “adultification” of youth justice (Henriksen et al., 2024; Hedlund et al., 2024).

Multiagency collaboration and vulnerability policing

In countries where DMCE has been identified as a key issue of public concern, this has led to intensified police efforts aimed at targeting criminal networks believed to be responsible for DMCE. In these countries there is, however, also a sense that punitive police efforts cannot stand alone, and that multiagency collaboration is needed to safeguard minors and other vulnerable groups (Naughton et al., 2022; Andell, 2023; Danish Government, 2023; Coomber et al., 2025; Government of Sweden, 2023).

All the participating countries have legislations that obligate authorities to ensure the welfare and protection of individuals under the age of 18. Denmark, Norway and Sweden have a long history of national partnerships between police, social services and schools. In these countries, government policy papers emphasise that multiagency partnerships should play a key role in preventing youth recruitment into serious drug crime and gangs but does not include specific frameworks for how to deal with the issue of DMCE broadly (Danish Government, 2023; Government of Sweden, 2025). In Ireland, several projects have been established to deal with children who are exploited through gangs, including the Greentown Project (Naughton et al., 2022).

In the UK, concerns with County Lines networks have led to a call for better multiagency

collaboration (Andell, 2019). Here the most partnership work occurs through local Multi Agency Safeguarding Hub teams (MASH) and Multi Agency Child Exploitation teams (MACE). However, even widely used structures like MACE vary in their implementation and efficacy across localities. As a result, some young people are redirected to youth justice services locally due to the lack of a baseline national strategy (Coomber et al., 2025). Updated legislation, including the Children and Social Work Act 2017, has reformed multiagency child safeguarding frameworks with three statutory partners: local government, police, and health services. However, partnership approaches are not without challenges, with differing professionals sometimes not fully understanding each other's roles and responsibilities, and both thresholds and scope of criminal exploitation are still not universally agreed.

In the UK there is also a growing sense that there is a need for more public-health based police approaches (Densley et al., 2023). Predicated on concepts such as “public health policing” and “vulnerability policing” (Marshall et al., 2024) Violence Reduction Units across the UK often base their strategies on and promote trauma-informed practices aimed at addressing root causes, supporting young people away from crime, and diverting them from being merely criminalised. Police and safeguarding teams also direct suspected DMCE victims to the National Referral Mechanism (NRM) which identifies and refers potential victims of modern slavery to ensure appropriate support.

Despite progress, including incorporation of “harm principles” in policing, several challenges remain: Many victims do not come forward due to fear of retribution or distrust of authorities. Law enforcement and social services need more resources and education, hindering their ability to identify and help DMCE victims. Exploitative drug dealing networks continue to adapt their methods. Indications from the UK, for instance, suggest that the initial governmental focus on DMCE of minors, has led seasoned criminals to increasingly target vulnerable adults (Gray, 2023). This development is also likely to happen in other countries

where legislative and police measures predominantly focus on DMCE of children and young people.

Discussion

The comparative analysis of drug market-related criminal exploitation (DMCE) across the countries in our European Research Consortium on Criminal Exploitation (ERCCE) reveals both shared patterns and distinct national differences in how this issue is understood, addressed, and integrated into criminal justice policy and practice frameworks. Central to these findings is the growing recognition of the exploitative dynamics within drug markets, where vulnerable minors and adults are subjected to coercion, manipulation, and harm.

A significant finding is that we cannot overstate the role of public discourses in shaping how DMCE become ‘visible’ as a social problem and the policy responses chosen. A key theme across European contexts, for instance, is the tension between traditional punitive approaches and prevention-oriented and harm-reduction frameworks. For instance, the UK’s use of the Modern Slavery Act highlights a shift toward reframing exploited individuals, including national citizens, as victims deserving protection rather than punishment. In the UK, DMCE is thus increasingly reframed as a public health and human rights issue. In contrast, in countries such as Denmark and Sweden, which are dominated by prevention narratives, there is a risk that the framing of vulnerable groups as (potential) “victims of recruitment” in need of “preventive protection” may result in a delimited focus on prevention and deterrence (as means of avoiding initial recruitment), and in a (legal) unrecognition of the harms experienced by individuals who have become recruited into/entrapped in DMCE-relations. Consequently, a victim status and rights to protections may not always sufficiently be extended to all victims of DMCE, but primarily (or only) to those who are in the very early phases of crime involvement. Similarly, in countries still characterised by strong linkages between notions of exploitation and traditional

human trafficking perspectives/policies, there is a risk that a dominant focus on iconic human trafficking victims (i.e. vulnerable foreign nationals), can unintendedly contribute to the relative invisibility of other DMCE-victims, such as domestic citizens and permanent-residence-permits-holders. Such differences reflect broader variations in national policy priorities and cultural perceptions of victimhood and criminality.

The above suggests that one way to advance our understanding of DMCE as a contextually constructed policy problem, is to extend our perspective beyond a focus on differences between “ideal-” and real-life “complex victimhood” (Moyle, 2019; Robinson et al., 2019; Shaw, 2024; Marshall et al., 2024), and to also include questions such as – constructed as victims *of what?* As we illustrated, there are likely to be differences in the responses deemed proper, depending on what exploited individuals are seen as victims *of* – e.g. recruitment or inflicted harm.

Another finding is that regardless of the framework chosen, public discourses and legal frameworks generally struggle to accommodate the “offender-victim overlap”, where individuals coerced into drug markets may simultaneously be perpetrators and victims. This duality complicates their identification as victims within systems traditionally predicated on binary distinctions between offenders and victims.

Multiagency collaboration emerges as a critical mechanism for addressing DMCE, particularly in safeguarding vulnerable groups. Countries like Denmark, Norway, Sweden have developed formalised partnerships among police, social services, and schools to prevent crime generally, including recruitment in serious drug crime, and in the UK, safeguarding partnerships specifically dedicated to dealing with criminal exploitation and related victimhood have been established. Structures alone however are insufficient and the UK experience to date is that the effectiveness of these collaborations hinges on consistent implementation, clear role definitions, and adequate resource allocation.

Finally, a further finding relates to the adaptive nature of criminal networks, which evolve to

exploit gaps in legislative and enforcement frameworks. For example, as UK efforts to address DMCE among minors intensify, there are indications of increased exploitation of vulnerable adults. This highlights the need for dynamic, adaptive strategies that anticipate and respond to shifts in criminal behaviour. Relatedly, there is a need for more research on how DMCE blend into and overlap with sexual exploitation, and with exploitation for other types of crimes such as gun violence.

Conclusion

This study contributes to research on DMCE by providing a comparative analysis of how this issue is recognised and addressed across European countries. While progress has been made, challenges remain in achieving a balanced approach that prioritises the well-being of vulnerable individuals while addressing the structural drivers of exploitation. Key policy recommendations include the need for harmonised legal definitions and frameworks to ensure consistent recognition and protection of DMCE victims across Europe, but which are also broad enough to encompass political and cultural differences. Multiagency collaboration must be strengthened, and public health and harm-reduction approaches integrated into criminal justice responses. Lastly, there is need for more research into the DMCE-problem, and how ‘it’ becomes visible as a policy problem, in other European countries beyond those included in this study.

Funding

The authors received no financial support for the research and/or publication of this article.

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Table 1: European Research on DMCE.

Country	Key victims made visible in research	Extent of Research*
UK	Children and youth. Vulnerable adults. Foreign nationals. Vulnerable prisoners.	Much research – The last six years has seen a massive growth in research on DMCE. This research has mainly focussed on DMCE structures, dynamics, and criminal justice responses, including dilemmas related to official recognition of victimhood and its conceptual status.
Ireland	Children and youth. Young women.	Emergent – a small number of studies have utilised police and practitioner knowledge to describe recruitment patterns into criminal networks, and the nature drug markets in local communities.
Poland	Children and youth. Minors in care institutions.	No direct research – while no studies directly focus on DMCE, several studies indicate that DMCE exists and that youth, who lived in deprived neighbourhood or are part of crime-involved peer groups, are vulnerable to DMCE.
Denmark	Children and youth. Vulnerable adults. Foreign nationals.	Emergent – a small number of studies have focused directly on DMCE, including a trendspotter study aimed at mapping main national DMCE-patterns, and a qualitative study currently in progress. Several studies have briefly touched upon the issue.
Norway	Foreign nationals. Children and youth.	Emergent – a small number of studies have focussed directly on DMCE, including a survey-study of professionals aimed at mapping the prevalence of exploitation of minors for crime, and a study of professionals working with unaccompanied minors seeking asylum in Norway.
Sweden	Children and youth.	Emergent – while several studies exist on youth involvement in “organised crime”, a small number of studies have directly focussed on DMCE. A recent study indicates a high demand for children and youth in the Swedish drug economy.

*The criteria used to categorise the extent of research are: “No direct research”, means that no studies have DMCE as a central focus. “Emergent”, means 1-5 studies have DMCE as a central focus. “Much research”, means 10+ studies have DMCE as a central focus.