



## Cynllun Diogelu Rhag Camfanteisio Ariannol Financial Exploitation Safeguarding Scheme



### Trading Standards Update – Scrutiny Committee - 18<sup>th</sup> December 2017

**The Progress and development of an initiative aimed at maintaining and improving citizen's quality of life at home, improving community resilience by reducing financial exploitation of vulnerable adults.**

#### 1.0. Backdrop/Context:

To assist the authority in carrying out its statutory obligations in relation to financial abuse, the team realigned part of their service offering in 2014 to reflect policy changes brought about by the Social Services and Wellbeing (Wales) Act 2014 (SSAWW).

The result was the creation of the Financial Exploitation Safeguarding Scheme (FESS), a multiagency initiative designed to detect and prevent the financial abuse of vulnerable persons.

FESS consolidated the team's portfolio of 11 practical financial safeguarding projects/initiatives into a single underlying financial safeguarding theme, subsequently creating a 'financial safeguarding network' that promotes the team's portfolio as a reciprocal voluntary participation scheme where private, third sector and local authority partners agree to work with Trading Standards to develop policies and procedures to identify, refer and support victims of financial abuse.

In return, partners receive access to a priority referral gateway, priority officer response, specialist training and access to specialist technical measures to support victims.

FESS has received numerous national awards and accolades<sup>1</sup> and has so far been replicated by 27 local authorities<sup>2</sup> nationwide.

FESS is further subject to a formal academic research project led by Carmarthenshire County Council Trading Standards in conjunction with Cardiff University<sup>3</sup>

### **1. Truecall Nuisance Telephone Call Blocking:**

The team initially purchased 100 devices using money confiscated from criminals under the Proceeds of Crime Act 2002 - Social Services have since provided additional funding to purchase a further 120 devices and the installation services of Care and Repair. The project is ongoing and Carmarthenshire nuisance call blockers have so far protected 67 vulnerable residents from nuisance/ scam telephone calls and blocked over 41,000 nuisance calls. (See appended infograph).<sup>4</sup>

### **2. National Trading Standards Board (NTSB) Scams Hub Intelligence Led Visits:**

As part of their national enforcement activities – Intelligence recovered by the NTSB in the form of victims lists or ‘suckers list’ are forwarded to local authority Trading Standards for safeguarding intervention.

The team prioritise this intelligence, cross referencing victims with Social Services and visiting/supporting victims with Police/Social Workers as appropriate.

The project is ongoing and the team have responded to intelligence relating to over 600 victims residing in Carmarthenshire (40 of whom were identified as vulnerable and in receipt of services from local authority social services teams).

### **3. NTSB Royal Mail Staff Training Program:**

National project coordinated by the NTSB in conjunction with Royal Mail to provide a formal training program to Post Office sorting offices in relation to Mass Mail Fraud

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<sup>1</sup> Municipal Journal Awards 2016 – Highly Commended - Innovation in Partnership, Municipal Journal Awards 2016 – Moneywise – Winner - Trading Standards and Environmental Health, Chartered Trading Standards Institute (CTSI) Conference 2016 – Winner - Best Local Authority Exhibitor, Wales Public Health Conference 2016 – Winner - Poster Competition, Association of Directors of Social Services (ADSS) Poster Competition 2015, 2017 – Shortlisted Poster Competition.

<sup>2</sup> Anglesey, Gwynedd, Conwy, Wrexham, Flintshire, Denbighshire, Powys, Swansea, Neath, Rhondda Cynon Taf, Monmouthshire, Gloucestershire, Worcestershire, Warwickshire, Hertfordshire, Nottinghamshire, Derbyshire, Essex, South Tyneside, Plymouth, Bury, Trafford, Sandwell, Islington, Hackney, East Sussex, Dudley.

<sup>3</sup> Trading Standards Financial Safeguarding Interventions – A social care perspective – Carmarthenshire Trading Standards – Research supervisor - Professor Mike Levi – Cardiff University School of Social Sciences (SOCSI) <https://www.cardiff.ac.uk/people/view/38041-levi-michael>

<sup>4</sup> Truecall infographic – Steve Smith – Director - Arona Ltd (Truecall) 03/11/2017

(MMF).

The team have delivered the formal training program to the Ammanford sorting office and will shortly be undertaking the program with the Llanelli and Carmarthen offices.

#### **4. Local Authority No Cold Calling Zones:**

Working in collaboration with Dyfed Powys Police, Mid and West Wales Fire and Rescue Service and CCC Housing Services, the service has set up 53 no cold calling zones (NCCZ's) and established the first no cold calling village in Carmarthenshire at Cilycwm.

Zones are implemented within areas where there is evidence of doorstep crime/distraction burglary, or where there is a high proportion of vulnerable residents. Residents are balloted and where a majority are in favor NCCZ's are implemented.

The initiative creates a criminal offence of calling on persons living in a zone and is punishable with a fine of up to £5000 and 2 years in imprisonment.

#### **5. Registered Handypersons and Gardeners Scheme:**

The team publish and advertise a free register of reputable traders who specialise in minor household and gardening work. The aim of the scheme is to ensure that consumers, in particular the elderly and vulnerable, are able to engage with confidently with the services of Handypersons and Gardeners.

Members of the scheme are required to sign an agreement promising to trade fairly and honestly and are regularly audited to ensure that they have up to date public liability insurance. Traders are further subject to a criminal record check.

We currently have 16 tradespersons registered with the initiative.

#### **6. Trading Standards Debt and Mental Health Interventions:**

The service has developed a programme for debt advisers, advocates, support workers and social workers to refer vulnerable persons who are experiencing debt and mental health issues.

The process involves the use of the Money Advice Liaison Group (MALG) and Royal College of Psychiatrists Debt and Mental Health Evidence Form (DMHEF).

Trading Standards can in some instances initiate criminal and/or civil enforcement action against such creditors, in particular, where practices are aggressive,

fraudulent, contravene the requirements of professional diligence or breach consumer credit licensing requirements.

The initiative has written off £23,000 of debt for vulnerable consumers where money should not have been lent due to vulnerability, or where the consumer has no realistic prospect of being able to repay the monies due to vulnerability.

#### **7. Don't Get Caught! Scams Awareness Campaign:**

72 Pop up Shops/ Scams awareness events have been delivered at local bank branches and at community events across the county. The campaign is based on a mock prize draw.

Such events aim to raise awareness of the issues surrounding financial abuse and provide an opportunity for officers to engage directly with the public, increase stakeholder engagement, promote financial safeguarding referrals and reinforce consumer protection messages.

#### **8. Vulnerable Consumer Advice and Advocacy:**

The service provides advice and advocacy services to vulnerable persons to enable them enforce consumer rights where they would otherwise be unable.

The service has a service level agreement with Citizens Advice Consumer Services (CACS) to ensure that vulnerable persons can still access specialist consumer advice and advocacy services.

We further maintain strong links with our local Citizens Advice Bureau (CAB), who refer vulnerable persons and criminal issues directly. (This is a reciprocal relationship and we utilise CAB services as part of our broader scheme where specialist support is required).

Assistance with letter writing, helping consumers understand complex contractual information or advice on taking a complaint through the civil courts or ombudsman services may also be provided.

This work encourages independence and participation to people who may otherwise be excluded from accessing justice and can also identify complex complaints/ issues that are not easily identifiable such as the improper sales of complex financial products or complex fraud.

#### **9. Moneywise Financial Education/Literacy Program:**

Money wise is a financial education/ literacy program created by Carmarthenshire Trading Standards in 2009.

Since then we have developed the program and been delivering bilingual lessons in local schools to children aged between 9 and 11 years, teaching them the basics of financial literacy and money management.

We have developed a bilingual web-based resource for Key Stage 2, covering themes such as employment and education, wages, income tax, budgeting, needs and wants, borrowing money and consumer rights.

The program has been well received by parents/schools and further embraced by the authority Education Department.

The program has been taken up by 69 schools out of 106 across the county.

#### **10. Financial Services, Private and Third Sector Safeguarding Protocols (FSP's):**

Financial Safeguarding Protocols (FSP's) have been in place since 2014 and have been agreed with all branches of Halifax, Barclays, Santander and the Citizens Advice Bureau in Carmarthenshire:

- £520,000 has been prevented from leaving residents bank accounts through the direct intervention of Trading Standards Officers.
- £482,647 has been identified as newly identified detriment i.e. money that would otherwise have gone undetected without Trading Standards intervention.
- £70,000 consumer redress - Money returned to consumer i.e. money returned to consumers through direct or assisted intervention of Trading Standards Officers.

Carmarthenshire FSP's pre-empt and compliment a recent initiative launched by the Police (The National Banking Protocol) where potential victims are identified by Bank staff and prioritised for a 999 emergency response.

It is our intention to promote FSP's with any organisation/ authority team (not only Banks) who comes into contact with vulnerable people, and who may be in a position to identify financial abuse.

We use our relationships with Social Services and our recently redefined Intelligence Sharing Protocol (ISP) with Dyfed Powys Police to respond and support victims referred through such channels.

#### **11. Independent Financial Adviser – Assured Advice Referral Scheme:**

The team have established links with 5 local 'regulated' independent financial advisers who have agreed to take free priority referrals of vulnerable victims and provide regulated advice on investment/pension/insurance fraud.

Referrals are made on the basis that regulated advice is assured by the Financial

Conduct Authority (FCA) and that consumers have recourse to the Financial Services Compensation Scheme (FSCS) for negligent/fraudulent advice.

## **2.0. The future:**

The FESS initiative provides a framework to assist the authority in building capacity to deal with the issues presented by financial abuse and helps assist the authority in meeting its obligations for early intervention, prevention and joint working strategies for the purposes of the Social Services and Wellbeing (Wales) Act 2014.

It should be further noted that much of the work undertaken by Carmarthenshire Trading Standards (not outlined in this report) may support further policy/compliance issues brought about by the Wellbeing of Future Generations Act 2015.

All of the initiatives described in this report are ongoing and the team continue to widen coverage and to develop new initiatives and ways of working as the scheme progresses. It is hoped that the formal research undertaken by the team will provide an empirical basis to support the wider value of the financial safeguarding work of the team in promoting social and economic wellbeing, increasing consumer resilience and contributing to improved health outcomes through the continued development of early intervention, prevention and joint working strategies.

We are looking forward to the future and to see how our work develops. The work of the department has already impressed at a national level and Carmarthenshire County Council should be recognized as one of the most proactive and forward thinking authorities in the UK when it comes to addressing the issues posed by the financial abuse of vulnerable people.