



A Review of Carmarthenshire County Council's Financial Exploitation and Safeguarding Scheme

FESS



**A report from the Task and Finish Group –
Environmental and Protection Scrutiny Committee**

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CHAIR'S FOREWORD

It gives me great pleasure to present this final report of the Task and Finish Group review on the Financial Exploitation and Safeguarding Scheme (FESS).



When the suggestion of undertaking a review of the Trading Standards Services' Financial Exploitation Safeguarding Scheme was raised at the Environmental and Public Protection Scrutiny Committee forward work programme development session in February 2019, it was embraced by all members of the Committee who subsequently commissioned a Task and Finish review in June 2019.

During this review, it became clear that any person, at any age can fall victim of financial exploitation and it is alarming and unsettling to know that fraud is on the increase. It was most disconcerting to learn that vulnerable people were being targeted, making them more likely to become a victim of fraud.

FESS, created and developed by Carmarthenshire Trading Standards, is an invaluable initiative which works to detect and prevent financial exploitation of vulnerable persons.

There is no doubt that reviewing the scheme and learning about the initiatives involved has been insightful. Each member of the group has come away with a profound knowledge of the different types of fraud, the safeguarding approach, the victim support, and the challenges that the team face.

I applaud Carmarthenshire Trading Standards for creating the Scheme and the initiatives as well as managing the workload with such limited resources.

The review took a little longer to complete than planned due to a necessary period of hiatus during the Covid-19 pandemic. However, during the pandemic, it was clear that the operation of the Scheme was instrumental in managing the unprecedented increase of fraud cases, which in itself speaks volumes about the necessity of supporting and investing in the promotion of the scheme for future years.

I would like to thank all those who took the time to meet with the Group, without whom it would have been difficult for the group to acquire the necessary insight of the scheme and its initiatives both from an operational and outcome perspective.

Finally, I would like to extend my sincere thanks to the officers from Trading Standards Services within the Communities Directorate for their hard work, advice and support, the Democratic Services Department, as well as to the members of the Task and Finish Group for their contribution to the review.

Councillor John James

Chair of the Task and Finish Group and

Chair of the Environmental and Public Protection and Scrutiny Committee

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SUMMARY OF THE REVIEW

At its informal Forward Work Programme Development Session held on the 22nd February, 2019 the Environmental & Public Protection Scrutiny Committee agreed in principal to undertake a review into the Carmarthenshire County Council Trading Standards fraud prevention initiative – The Financial Exploitation Safeguarding Scheme (FESS).

Recognising that prevention is better than cure and that fraud presents an increasingly significant local and national issue of particular concern to elderly and vulnerable residents living in Carmarthenshire at its meeting held on 10th June, 2019 the Committee approved the decision to review FESS and commissioned a Task and Finish Group (TFG) to undertake the review.

As FESS is a long-established fraud prevention initiative operated by the council, the TFG were keen to review whether the current operational service provision in running FESS was sufficiently robust, consistent, coordinated, provided measurable outcomes and presented value for money.

Scope and Aims:

The scope and aims of the review to explore whether the portfolio of crime prevention, victim support and education activities consolidated within the FESS initiative provide an effective local authority strategy to help combat fraud victimisation and promote corporate health and wellbeing objectives in the wake of the Social Services and Wellbeing Wales Act 2014 and the Wellbeing of Future Generations Act 2015.

The Group undertook the review to:

1. Assess the current training provision, integration of services, information sharing and strategy responses of key stakeholders and explore opportunities for improvement.
2. Explore whether current service provision is sufficiently robust, consistent, coordinated, non-duplicative, provides measurable outcomes and presents value for money.
3. Review current prevention strategies and the levels of support provided to fraud victims.
4. Research new ways to raise the profile of the service and to attain recognition of the specialist body of skills, knowledge and support Trading Standards provide to residents of Carmarthenshire.
5. Formulate recommendations for consideration by the Executive Board.

Given the unprecedented circumstances society has found itself due to the COVID 19 pandemic which struck whilst this review was being undertaken, we have further included a short review of how the FESS has responded to fraud issues posed by the pandemic.

1.0. CONTEXT AND BACKGROUND

It is beyond the scope of the review to provide a full context for fraud as it is a crime that manifests itself in many different ways and is understood differently by the wide variety of agencies responsible for enforcing fraud legislation and supporting/ protecting victims.

The review seeks to look specifically at the financial safeguarding work undertaken by Trading Standards Officers under the FESS initiative in Carmarthenshire in relation to preventing and supporting victims of doorstep crime, telephone, mass mail and email fraud.

The primary focus of FESS is to protect and support vulnerable adults, either identified as victims of financial exploitation or 'at risk' of becoming victims due to a lack of care and support as defined by the Social Services and Wellbeing (Wales) Act 2014. However, access to the scheme and specialist support is available to all members of the public as part of the Trading Standards wider statutory fraud, consumer protection and enforcement remit.

It is important to consider the language used to describe fraud. For the purposes of the review: *"Scams are fraud and fraud is financial exploitation /abuse."* Such semantic distinction may further help identify any barriers in relation to fraud enforcement, victim support and safeguarding.

1.1 FRAUD NATION WIDE

Fraud is recognised by the Home Office as a significant national threat with links to serious organised crime.¹ The National Fraud Indicator (2011) estimated that national losses to fraud are in the region of £38 billion, however this figure includes corporate and non-consumer type fraud.² The Crime Survey for England and Wales shows that there were an estimated 3.8 million incidents of fraud in the year ending March 2019, with evidence of a rising trend that is also seen in other data sources making fraud the most common form of crime in England and Wales.³

To bring fraud into the context of this review and within the local realm of local authority Trading Standards Services, the Office of Fair Trading (2006) estimated that every year 3.2 million UK residents lose £3.6 billion to scams⁴ and the National Trading Standards Scams Team estimate this figure to be now closer to £10 billion.⁵

As well as causing significant financial harm, the group recognised that fraud also impacts on health and wellbeing. 'Research has found that 45 per cent of fraud victims felt that the financial loss they experienced had an impact on their emotional wellbeing and 37 per cent reported a significant psychological or emotional impact.'⁶

¹ [Serious and Organised Crime: Home Office research priorities April 2018 to March 2021 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444444/serious-and-organised-crime-research-priorities-2018-2021.pdf)

² Annual Fraud indicator [http://www.homeoffice.gov.uk/publications/agencies-public-bodies/nfa/annual-fraud-indicator/](https://www.homeoffice.gov.uk/publications/agencies-public-bodies/nfa/annual-fraud-indicator/)

³ Nature of Fraud and Computer Misuse in England and Wales year ending March 2019 [Nature of fraud and computer misuse in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/natureoffraudandcomputermisuseinenglandandwales/2019-03-01)

⁴ Office of Fair Trading (2006) Research on impact of mass marketed scams - A summary of research into the impact of scams on UK consumers OFT883 – Retrieved from: <http://www.icfs.org.uk/~icfs.org.uk/images/pdfs/60.pdf>

⁵ National Trading Standards Scams Team (2016) Retrieved from: http://www.dementiaaction.org.uk/assets/0001/9328/Safeguarding_PWD_from_Scams_-_Louise_Baxter.ppt&rct=j&frm=1&q=&esrc=s&sa=U&ved=0ahUKewiTy8vLOdHLahVLXBoKHSEIDZQFgg8MAc&usq=AFQjCNFwCFYbCXXzI0ph1_Pc7_eMSQHZIA

⁶ MORE THAN JUST A NUMBER: IMPROVING THE POLICE RESPONSE TO VICTIMS OF FRAUD DECEMBER 2018 – THE Police Foundation

Overall responsibility for fraud enforcement and policy in general lies with the Police and UK Government, however the health and social care model of fraud prevention advocated by the FESS initiative means that fraud (where identified with financial abuse/exploitation) may be looked at through another lens and that policy in this area could also be viewed as a devolved matter.

1.2 FRAUD IN CARMARTHENSHIRE

Unfortunately, the way complaints data in relation to fraud is received by the authority and the difference in language used to relate to fraud by the various stakeholders means that it is difficult to obtain a true picture of the scale of fraud locally.

- **That no local authority fraud measure exists was of great concern to the group.**

Trading Standards typically receive complaints data from Citizens Advice Consumer Services and/or local reports from colleagues or partner organisations, however these may initially manifest themselves as a 3rd party referral or notification of a scam, a request for service where a person for example is receiving lots of nuisance or 'scam' calls or where an unknowing victim is identified via site visit or identified as unwitting victim of a fraudulent/ rogue trader and where fraud may commonly be misidentified as a civil matter.

Where Trading Standards receive referrals relating to financial exploitation directly or from partners these are recorded as FESS Referrals on the Trading Standards Information System APP. It should be noted that all FESS referrals recorded here relate to high-risk individuals assessed/identified as previous victims and/or as vulnerable 'at risk' individuals.

Fig 1. Carmarthenshire Trading Standards – FESS Referrals Carmarthenshire - 2019/20:

Date range	High Risk FESS Referrals
January to December 2019	60
January 2020 to date (03.03.20)	70
Totals	

Source: Carmarthenshire County Council – CIVICA APP – FESS

The total amount of fraud complaints made to the authority is likely to far exceed the figures provided in Fig 1. due to the way FESS referrals change and develop through ongoing intervention/ support. For example, an officer supporting someone locally complaining about receiving nuisance calls uncovered engagement with a known prize draw and vitamin supplement fraud that had been going on for 9 years resulting overall loss of £46K. That the consumer did not identify this with fraud and did not wish to complain highlights the problem and difficulty in providing a more conclusive picture of the scale of fraud reported to the authority other than that provided in Fig 1.

Fig 2. Dyfed Powys Police - Operation Signature's Referrals 2019/20:

Date range	Number of cases	High	Medium	Low	Unknown/NA
January to December 2019	439	47	106	283	3
January 2020 to date (03.03.20)	94	8	15	69	2
Totals	533	55	121	352	5

Source: Dyfed Powys Police – Operation Signature

Both FESS and Operation Signature figures provided the group with some insight and cause for concern when looked at in relation to research conducted by the Office of Fair Trading (2006) where it was suggested 'the majority of scams go unreported and that fewer than five per cent of people report them to the authorities.'⁷

If we were to conservatively make an estimate of unreported fraud on the figures reported to Trading Standards in 2019 of 60 high risk cases using the Office of Fair Trading (2006) estimate of a 5% reporting rate, this would equate to an estimate of 1140 unreported cases based on the Trading Standards figures alone and not factoring in the cases reported by Dyfed Powys Police.

Further to this, Age UK estimate that 53 per cent of people aged 65+ believe they have been targeted by fraudsters.⁸ In Carmarthenshire based on population data generated on 1st January 2019⁹ this would equate to some 23,766 people aged 65+ being targeted by fraudsters:

- Carmarthenshire Population as of 1st January 2019 = 187,568
- Carmarthenshire population aged 65> as of 1st January = 44,843
- 53% of 44,843 = 23,766

The Office of Fair Trading (2006) further found that 'up to 20 per cent of the UK population could be particularly vulnerable to scams, with previous victims consistently more likely to show interest in responding again'¹⁰

Whilst such estimates do not come anywhere near informing a comprehensive or detailed assessment of the scale of fraud within the County, when coupled with the reported figures from Dyfed Powys Police, national statistics, academic literature and Officers subjective experiences, it is reasonable to intuit the scale of fraud both locally and nationally to be significant and where a large number of older persons may also be targeted.

⁷ Office of Fair Trading (2006) Research on impact of mass marketed scams - A summary of research into the impact of scams on UK consumers OFT883 – Retrieved from: <http://www.icfs.org.uk/~icfs.org.uk/images/pdfs/60.pdf>

⁸ Age UK. (2015). Only the tip of the iceberg: Fraud against older people. Evidence review. Retrieved from <http://www.ageuk.org.uk/documents/en-gb/for-professionals/consumer-issues/age%20uk%20only%20the%20tip%20of%20the%20iceberg%20april%202015.pdf?dtrk=true>

⁹ [Demographic statistics Municipality of CARMARTHENSHIRE, population density, population, average age, families,\(urbistat.com\)](http://www.urbistat.com)

¹⁰ Office of Fair Trading. (2009). *The psychology of scams: Provoking and committing errors of judgment.* (OFT1070). Retrieved from http://webarchive.nationalarchives.gov.uk/20140402142426/http://www.oft.gov.uk/shared_oftr/reports/consumer-protection/oft1070.pdf

The Alzheimer's Society estimate the number of people in UK with dementia predicted to rise from 850,000 to 1.1 million by 2025¹¹ and studies have shown that certain types of fraud, for example telephone fraud, can be positively correlated with older age¹² and approximately 1 in 20 adults can be expected to experience some form of financial exploitation past the age of 60 with cognitive impairment, commonly associated with older age increase the likelihood of victimisation.¹³ To put this into a Welsh context, in 2008, 18 per cent of the population of Wales were over 65, by 2033 this is expected to rise to almost 26 per cent.¹⁴

- **With reported national average losses per victim amounting to £2952¹⁵ the group recognises the threat posed by fraud to be of very serious concern.**

1.3 FINANCIAL EXPLOITATION SAFEGUARDING SCHEME (FESS)

The Financial Exploitation Safeguarding Scheme (FESS) was created by Carmarthenshire Trading Standards in December 2014 and aimed to establish a multi-disciplinary safeguarding network of key professionals and stakeholders concerned with preventing fraud against vulnerable people by carers, family members, doorstep criminals, telephone, mail and email fraud.

By linking existing trading standards fraud prevention and financial safeguarding activities to the policy requirements of the Social Services and Wellbeing (Wales) Act 2014, the initiative sought to promote the comprehensive body of fraud prevention and support work undertaken by CTS through a local professional's network to deliver more joined up support for victims of 'financial exploitation.'

FESS consolidated nine established Carmarthenshire Trading Standards financial safeguarding projects and changed the language used to depict 'fraud' to provide a vehicle to more easily promote their fraud prevention and support portfolio among health and social care partners based on the underlying 'safeguarding' theme rather than promoting nine separate scam or fraud prevention projects.

¹¹ Alzheimer's Society (2015) 'Dementia 2015: Aiming higher to transform lives.' Alzheimer's Society, London

¹² Correlates of Susceptibility to Scams in Older Adults Without Dementia (2013) – James.B.D, Boyle P.A, Bennet D.A
<https://doi.org/10.1080/08946566.2013.821809>

¹³ Cognitive, social and neural determinants of diminished decision making and financial exploitation risk in aging and dementia: a review and new model (2016) – Spreng N.R Karlawish J, Marson D.C – Journal of Elder Abuse & Neglect, 28:4-5, 320-344.

¹⁴ National Assembly For Wales. (2011). *Key issues for the fourth assembly*. Cardiff: National Assembly for Wales.

¹⁵ National Trading Standards Scams Team (2016) Retrieved from:
http://www.dementiaaction.org.uk/assets/0001/9328/Safeguarding_PWD_from_Scams_-_Louise_Baxter.ppt&rct=j&frm=1&q=&esrc=s&sa=U&ved=0ahUKewiTy8vL0dHLAhVLXBoKHSEiDZ0QFgg8MAc&usq=AFQjCNFwCFYbCXXzI0ph1_Pc7_eMSQHZIA

1.4. FESS INITIATIVES

1) trueCall© Nuisance Call Blockers - Project Start 2013 – Present

127 free trueCall© nuisance call blocker devices have been installed in the homes of vulnerable people to prevent telephone fraud victimisation and/or as a palliative measure to give families respite at difficult times since 2013. The device works by intercepting all in-bound telephone calls, other than those from a pre-registered list of trusted telephone numbers. In addition, and in response to Covid-19 pandemic, Carmarthenshire Trading Standards have developed a system to monitor devices and generate alerts to officers when a service user is suspected of being exposed to fraudulent telephone calls. The section has recently received funding specifically for 500 additional trueCall© devices, which will be installed in residents' homes as part of a project to evaluate the efficacy of the monitoring programme over the next 12 months.

2) Debt and Mental Health Interventions - Project Start 2014 – Present

Trading Standards intervention where creditors do not take a consumer's mental health issues into account in debt situations. Using the Royal College of Psychiatrists/Money Advice Liaison Group Debt and Mental Health Evidence Form, Trading Standards have legal powers to intervene, support social care professionals and protect vulnerable persons from stress, anxiety and pressures of debt.

3) Vulnerable Consumer Advice Interventions/ Expert Advocacy – Project Start 2000 – Present

Expert advice and advocacy to vulnerable consumers, social care, advice and support for professionals to help vulnerable consumers access the criminal/civil justice system and identify potential policy issues.

4) No Cold Calling Zones – Project Start 2006 - Present

Trading Standards implement zones that prohibit cold calling in areas with high proportions of elderly or vulnerable persons. To date Trading Standards have implemented 56 zones in streets or housing complexes and one No Cold Calling Village (Cilycwm). All the zones have led to a reduction in incidents of doorstep crime / distraction burglary in those areas, thereby protecting vulnerable persons and enabling them to feel confident and safe in their homes. No Cold Calling Stickers can be obtained through request made via the Carmarthenshire County Council Contact Centre and are typically given out as part of an information pack at local events and when visiting service users in their homes.

Fig 3. No Cold calling Door Sticker/ Signage:



No Cold Calling Farms

Having identified a potential link between cold callers arriving at farms offering goods and services and subsequent thefts on farms, Trading Standards (working alongside Dyfed Powys Police Rural Crime Team) have extended the No Cold Calling Zone project to establish No Cold Calling Farms. Farmers who have been subject to cold calls and/or victims of burglaries have been encouraged to place a 'No Cold Caller' sign on their farm entrance. To date, 18 No Cold Calling Farms have been established and a further 80 farms are on a waiting list. Trading Standards have received £1050 from the Police and Crime Commissioner to help pay for signage.

Fig 4. No Cold Calling Farms Signage:



**5) Buy with Confidence Scheme – Registered Traders Scheme -
*Project Start 2006 – Present***

In response to concerns about 'rogue traders' which are often highlighted in the media. The scheme is a continuation of the Carmarthenshire Trading Standards Local Registered Traders Scheme providing consumers with a list of local businesses which have given their commitment to trading fairly. Every business listed has undergone a series of detailed checks by Trading Standards before being approved as a member of the scheme. There are currently 26 businesses registered with a further 32 currently going through the stringent application process.

www.buywithconfidence.gov.uk

Out of the 9 FESS interventions, 'Buy with Confidence' is currently the only chargeable initiative.

Fig 5. Buy With Confidence Scheme Logo



**6) Consumer Financial Education/Awareness Money Wise –
*Project Start 2009– Present***

We provide community-based education and resources including a digital online teaching package (Money Wise) to develop financial skills, raise consumer awareness and computer literacy to facilitate financial and social independence. Over 100 Key Stage 2 classes across 80 schools in the county have registered for Money Wise. (See Appendix A)

[Moneywise: Carmarthenshire County Council Trading Standards](#)

7) Banking Private and Third Sector Safeguarding Protocols – 2014 – Present

Safeguarding agreements that help identify vulnerable people in the community such as in Banks, shops, advice and community organisations as part of an early intervention and prevention strategy the perspective that financial abuse may be symptomatic of other underlying health or social issues. For a partner to become a scheme member, an agreement in the form of a set protocol is signed. The Scheme member is presented the signed and framed protocol to place on public display. The protocol currently has 20 organisations signed up including 11 banks.

8) Don't Get Caught Scam Awareness Campaign – 2014 – Present

Scams awareness campaign conducted as pop-up shops in local Banks and Community Events – Designed around prize draw mock-up to attract and engage with persons who like the idea of winning prizes (A common hook used in certain types of mass marketing scams).
(See Appendix B)

9) NTS Scams Hub – Intelligence Led Visits – 2014-present

National intelligence received from the NTS Scams Team is provided to the team a monthly basis. The information relates to residents who have been identified as engaging with known fraudsters where the NTS have seized information during their enforcement activities – We currently agree to only visit 12 persons per month due to resource issues.

1.5 LEGISLATION AND POLICIES

FESS has been recognised corporately as fulfilling a vital statutory support function for the purposes of compliance with the Social Services and Wellbeing (Wales) Act 2014 and the Wellbeing of Future Generations Act 2015. Promoting strategies of social and economic wellbeing, reducing poverty and preventing abuse and neglect and has been included within the following authority strategy/policy documents:

Carmarthenshire County Council Corporate Policy Documents:

- Integrated Community Strategy 2011 – 16
- Corporate Strategy 2015 - 20
- Corporate Improvement Plan for 2015 - 16
- Ageing Well Plan (Incorporating Strategy for Older People) 2015 – 18
- Local Authority Revised Gambling Policy 2016

In addition to local Policy, FESS works within national safeguarding policy framework in relation the All Wales Safeguarding Procedures and officers have powers to investigate case of financial exploitation under the Consumer Protection from Unfair Trading Regulations 2008 and Fraud Act 2006.

Policy Context - Social Services and Wellbeing (Wales) Act 2014

FESS promotes the health, wellbeing and independence of service users by working towards a joined-up approach to financial exploitation and contributing to a package of interventions that go beyond the offering of any one given department by:

- Providing new ways of working with other health/social care departments and private sector organisations to ensure that persons 'at risk' of financial abuse access and receive the necessary support where they do not necessarily meet the requirements for full social work interventions and support.

- Extending safeguarding principles into the private sector and increasing awareness of safeguarding policy and providing clear referral pathways for vulnerable people.
- Developing proactive detection strategies, mapping the demographics of vulnerable 'at risk' individuals to proactively facilitate targeted awareness campaigns and early intervention.
- Providing a valuable intelligence gateway and hub for the detection of criminality and information sharing that may provide valuable evidence of vulnerability/ safeguarding risk, apprehension and prosecution of offenders.

FESS brings with it private and 3rd sector involvement from high street banks and local advice and support services and is currently the subject of formal research with Cardiff University and has 36 local authority research partners across the UK who have signed up to promote their own local FESS initiatives.

Wellbeing of Future Generations Act 2015 and Carmarthenshire County Council Corporate Wellbeing Objectives

The task and Finish Group agreed that FESS coincided with the Council's Vision:

'Life is for living, let's start, live and age well in a healthy, safe and prosperous environment'

In addition, the work of FESS contributed to the following Carmarthenshire's Well-being Objectives from the County Council's Corporate Strategy 2018-23

(<https://www.carmarthenshire.gov.wales/media/1214849/corporate-strategy-2018-23.pdf>):

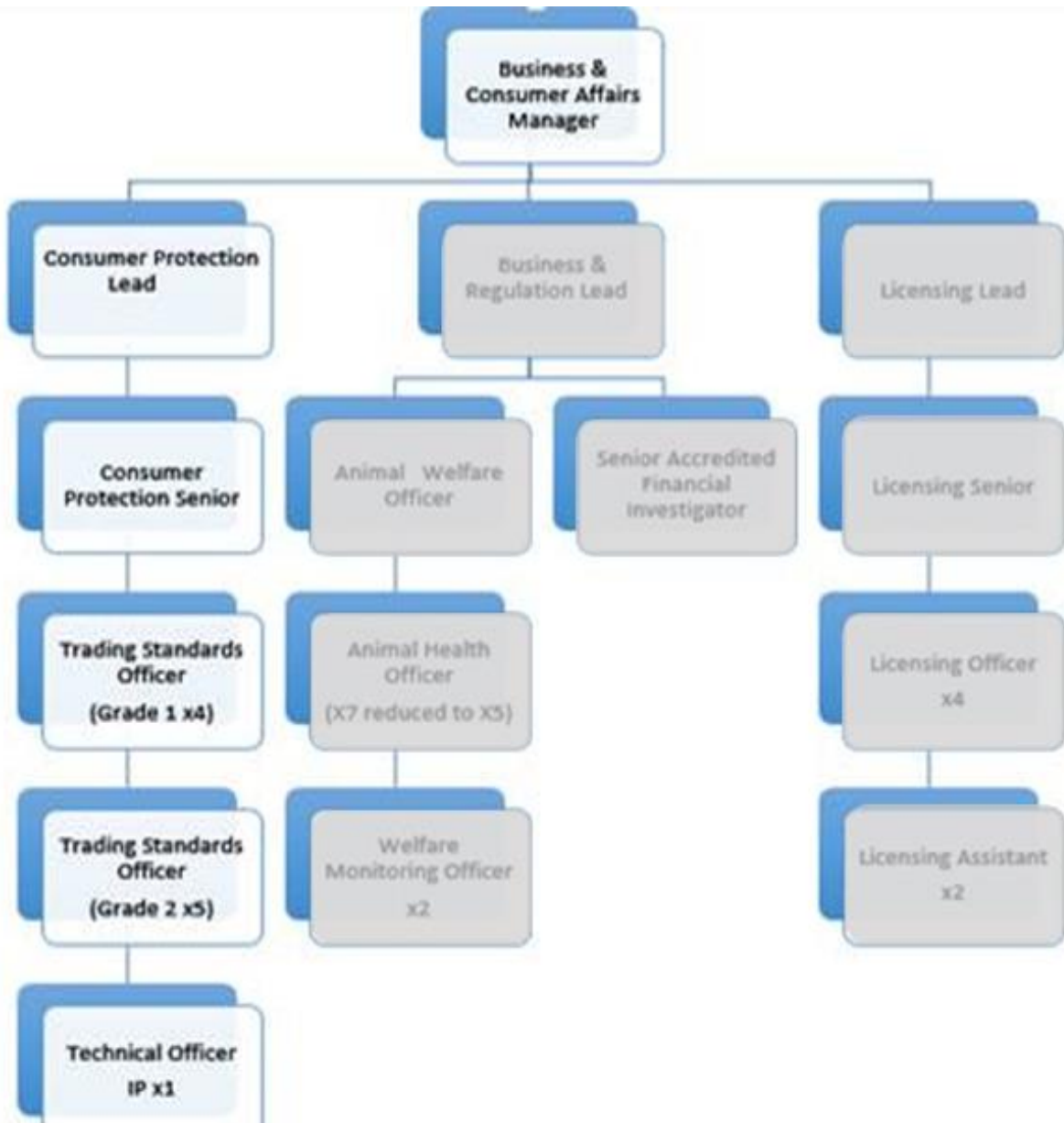


Start Well/Live	Age Well	Other
<p>Wellbeing Objective 1 Help to give every child the best start in life and improve their early life</p> <ul style="list-style-type: none"> • Moneywise • Don't Get Caught Scams Education • Consumer Advice Interventions/ Advocacy/ Education 	<p>Wellbeing Objective 9 Support good connections with friends, family and safer communities</p> <ul style="list-style-type: none"> • No Cold Calling Zones • trueCall • Don't Get Caught Scams Education 	<p>Wellbeing Objective 15 Building a Better Council and Making Better Use of Resources</p> <ul style="list-style-type: none"> • FESS • Private and 3rd Sector Safeguarding Protocols
<p>Wellbeing Objective 5 Tackle poverty by doing all we can to prevent it, help people into work and improve the lives of those living in poverty</p> <ul style="list-style-type: none"> • Moneywise • Debt and Mental Health Interventions • trueCall • No Cold Calling Zones • Consumer Advice Interventions/ Advocacy/ Education • Don't Get Caught Scams Education 	<p>Wellbeing Objective 10 Support the growing numbers of older people to maintaining dignity and independence in their later years</p> <ul style="list-style-type: none"> • No Cold Calling Zones • trueCall • Don't Get Caught Scams Education • Consumer Advice Interventions/ Advocacy/ Education <p>Wellbeing Objective 11 A Council wide approach to support Ageing Well in Carmarthenshire</p> <ul style="list-style-type: none"> • FESS • Private and 3rd Sector Safeguarding Protocols • Don't Get Caught Scams Education • Consumer Advice Interventions/ Advocacy/ Education 	

1.6 TRADING STANDARDS SERVICES

Carmarthenshire Trading Standards Services sits within the Department of Communities – Homes and Safer Communities – Business and Consumer Affairs division.

The team has an annual budget of £758,657 per annum which provides for the following departmental structure:



Trading Standards Officers are responsible for enforcing around 40 Acts of parliament and over 1,000 associated regulations, which impact on all aspects of daily life, from the safety of children's toys, to the honesty of property descriptions when buying a home. The Trading Standards department, have a statutory obligation to undertake work in relation to:

- Legal Metrology - (Weights and Measures)
- Petroleum/Explosives licensing
- Product Safety
- Intellectual Property
- Fair Trading Enforcement
- Fraud
- Underage Sales
- Advice and Guidance

1.7. FESS RESOURCES

The Trading Standards department does not have a dedicated FESS officer and the work currently accounts for approximately 1.5 Full Time Equivalent – This is worked out as a spread over 6 full time staff who in addition to their daily job carry out the work of FESS, equating to approximately a quarter of their time.

The cost attributed to FESS alone between December 2014 to November 2019 is as follows:

<p>Departmental Core Budget:</p> <p>£350,000 over 5 years = £70K PA</p>	<p>Additional Non - Core Funding:</p> <ul style="list-style-type: none"> • £39,400 trueCall©: Asset Confiscation - Proceeds of Crime Act (POCA) Grant Funding Social Services Intermediate Care Fund (ICF) • £10,000 Money Wise Website: Asset Confiscation - Proceeds of Crime Act (POCA) • £5000 FESS Website: Asset Confiscation - Proceeds of Crime Act (POCA) • £15,000 Marketing Materials x 5 years (£3,000 pa) Asset Confiscation - Proceeds of Crime Act (POCA)
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During the same period (December 2014 - November 2019), FESS realised the following consumer benefit/savings:

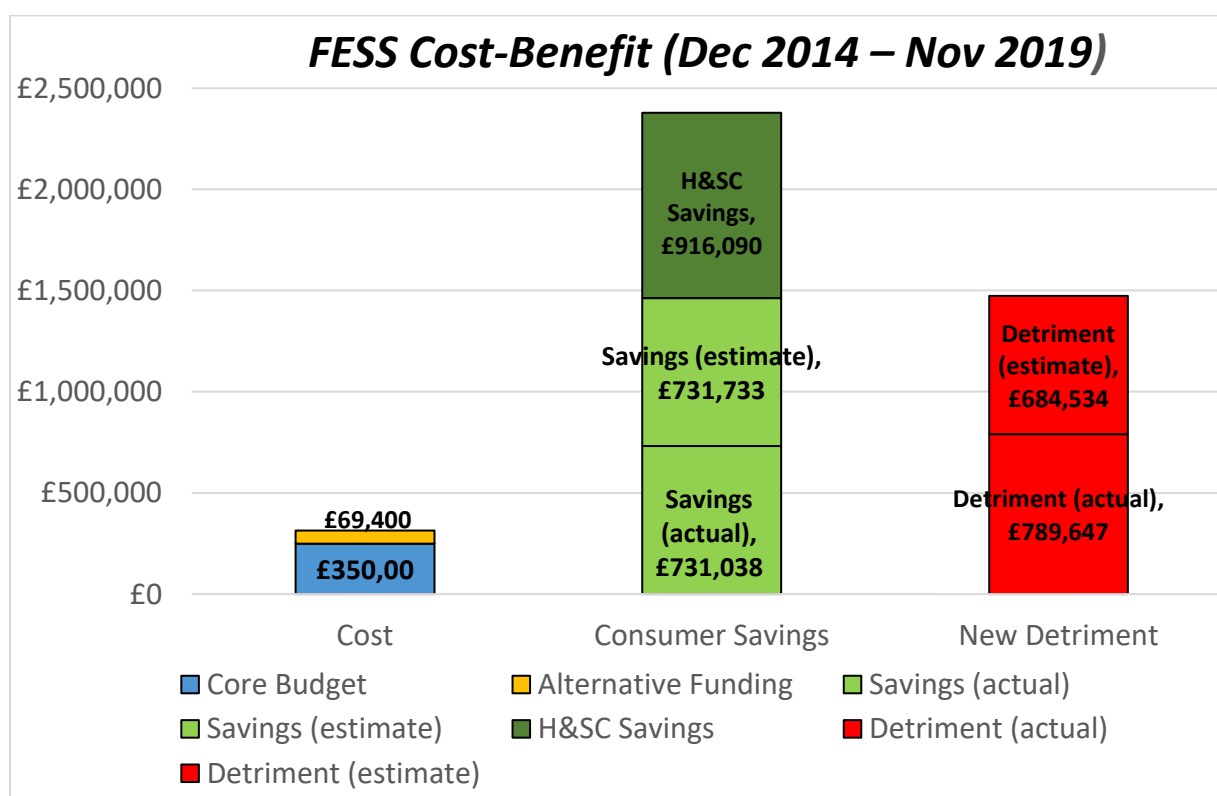
Prevention: <ul style="list-style-type: none"> • £578,455 FESS Safeguarding referrals • £456,928 NTS Scams Hub (estimate) • £274,805 trueCall© (estimate: 105 units) 	*Consumer losses not previously identified: <ul style="list-style-type: none"> • £789,647 FESS Safeguarding referrals • £684,534 NTS Scams Hub (estimate)
Redress: <ul style="list-style-type: none"> • £129,583 Consumer refunds • £23,000 Debt written off (DMHEF) 	
Total = £1,462,771	Total = £1,474,181

*Consumer losses not previously identified – During case investigations, it is often revealed that persons referred have previously been a victim and lost money that nobody knew about. These are financial losses that would have gone unrecorded had it not been for FESS Intervention.

The Estimated health and social care savings identified as a result of the trueCall© system amounts to estimated total saving of £916,090 for a project cost of £16,275 – a payback of 56 times the cost.

For a full break down of trueCall© Cost Saving Benefit Analysis please see Appendix C

The graph below summarises the cost benefits of FESS:



FESS is managed using multi-disciplinary officers and with the limited resources available, it has been essential to seek resources elsewhere.

Resources are not considered to be purely financial and FESS creates reciprocal joint working relationships between social care services, public protection and the private sector to extend the support offered to victims to reduce the financial and human resource burden on the respective teams in order that service users obtain specialist resource of respective teams where otherwise such support might have been precluded.

All partner agencies therefore provide intelligence that can assist Trading Standards with combating offences associated with financial exploitation, as well as providing advice, guidance and further support to those victims and potential victims affected.

Examples:

- Engaging with a Bank for the Bank to help support a victim and monitor a victims account. This may be reciprocated with the installation of trueCall© devices for vulnerable Bank customers to help prevent fraud victimisation and to prevent future losses to the bank where the bank has had to refund the victim under regulation.
- Identifying victims where financial exploitation has caused financial problem debts/ benefits etc. Referrals are made to The Citizens Advice Bureau – in exchange Citizens Advice have direct priority line communication with Trading Standards Officers and receive specialist training.
- Intervening where victims have Debt and Mental Health issues uses specialist regulatory powers of Trading Standards Officers. This may assist Social Workers and service users struggling with debt collection practices that may exacerbate vulnerability. Social Workers may provide specialist advice and support in relation mental health issues and/or wider client social support services/needs.

1.8 PROCEEDS OF CRIME

Trading Standards in Carmarthenshire take the lead in the authority in relation to asset confiscation under the Proceeds of Crime Act 2002 and have a dedicated Financial Investigation Unit comprising of 4 Officers who undertake asset confiscation not only for Carmarthenshire County Council Enforcement Teams but are also commissioned to undertake asset confiscation for other Local Authorities across the UK.

Assets/Money confiscated can be used to fund initiatives that aim to reduce the crime types from which the assets were generated by criminals.

Asset confiscation has been used to fund the following FESS initiatives in Carmarthenshire:

- **£39,400** trueCall©
- **£10,000** Moneywise
- **£5000** FESS Website:
- **£15,000** Marketing Materials x
5 years (£3,000 pa)

Asset confiscation has also contributed to initiatives to home Syrian Refugees in Carmarthenshire and also helped to fund Foodbanks in the county.

1.9 MEMBERSHIP OF FESS NETWORK AND ITS PROTOCOL

Local Authority Members of the scheme who agree to promote a scheme locally receive a comprehensive and regularly updated promotional resource pack, periodic research updates and access to a member directory enabling further stakeholder engagement and the location of fellow scheme members with whom to liaise in the support of victims via the website: <https://fess.carmarthenshire.gov.uk> currently, there are 36 local authority members across the UK.

For a partner to become a scheme member, an agreement in the form of a set protocol is signed. The Scheme member is presented the signed and framed protocol to place on public display. The protocol currently has 20 organisations signed up including 11 banks.

Scheme members who follow the protocol forms a process of due diligence which helps to minimise the number of complaints and increasing membership of the initiative is something the team would like to build on based on resource and pandemic.

1.10 FRAUD INTELLIGENCE

Trading Standards obtain fraud intelligence from a variety of source including but not limited to:

- Direct referral/ complaints from public
- Local Authority Hwbs/ Delta Wellbeing IAA
- Citizens Advice Consumer Services
- Local FESS Scheme Members – Private/ 3rd Sector
- Local Police
- Local Health and Social Care Services
- Proactive Online Monitoring – Facebook Marketplace/ ebay etc.

Trading Standards have strong links with Citizens Advice Bureau both locally via a reciprocal Service Level Agreement with all three Citizens Advice Offices in the county enabling quick access to a wide variety of important of face-to-face advice and advocacy services and robust intelligence sharing protocols.

Nationally, Citizens Advice Consumer Services provide a national contact centre for consumer advice enquiries and Trading Standards receive details of all enquiries as notifications of civil consumer law advice provided and criminal referrals where criminal consumer protection law has been breached. Carmarthenshire trading Standards have a service level with Citizens Advice Consumer Services to respond to all referrals within 5 days and arrangements are in place for warm transfer where vulnerable and criminal matters require urgent and immediate attention. Citizens Advice Consumer Services further refer suspected to fraud complaints to the Police reporting centre Action Fraud and are a well-respected and reliable partner for Trading Standards Services across the UK.

National Fraud Intelligence for the Police is received locally and sits mainly with the Police National Reporting Centre (Action Fraud) run by the City of London Police. As part of FESS's ongoing research, a survey was undertaken with 27 participating local authorities the findings indicating poor engagement with/ from relevant stakeholders nationally.

Trading Standards across the UK report that details in relation to fraud intelligence are not routinely forthcoming from Action Fraud or local Police and that local relationships with the police fluctuate across the UK. See Appendix D - Financial Exploitation Safeguarding Scheme (FESS) - Pilot Study - Trading Standards Integration 1.

1.11 PROMOTION AND AWARENESS RAISING

The FESS scheme aims to create closer working relationships between Trading Standards Services and local organisations to help identify and protect vulnerable persons who may be the victims of scams or other forms of financial abuse.

Currently, the promotion of FESS is very ad hoc, mainly due to limited resources. However, as there wasn't a co-ordinated approach or promoting structure in place, the Trading Standards department heavily relied upon word of mouth, talks/training and building relationships with partners to promote FESS for example Local Advice and Support Events i.e. 50+ forum, Pop Up Shops in Local Banks/ Building Societies, Shopping Centres etc, attending team meetings with social work teams for example the Community Team for Learning Disabilities, Adult Protection and Mental Health.

The initiative has also been promoted nationally and has received the following awards and recognition:

- Shortlisted – Poster Presentation - Association of Directors of Social Services Conference 2015
- Winner - Best Local Authority Exhibit - Chartered Trading Standards Institute Conference 2015
- Presentation - Older Persons Commissioner 2015
- Conference Presentation/ Workshop – Action on Elder Abuse – Cardiff City Hall 2016
- Presentation – Chief Executive - Care Inspectorate for Wales 2016
- Winner – Money Wise (Trading Standards and Environmental Health), The Municipal Journal Awards 2016
- Highly Commended (Innovation in Partnership) The Municipal Journal Awards 2016
- Shortlisted (Delivering Better Outcomes) The Municipal Journal Awards 2016

- Winner - Best Local Authority Exhibit (Chartered Trading Standards Institute - Conference 2016)
- Winner – Poster Presentation - The Welsh Public Health Conference 2016
- Invited to the Senedd, Cardiff Bay to speak with Assembly Ministers as part of Trading Standards Wales Position Statement 2017
- Winner – Chartered Trading Standards Institute – Hero Award – Outstanding Team – COVID - 19 Response 2020
- Inclusion - Financial Abuse Best Practice Exemplars – FESS and Delta Wellbeing – Older Persons Commissioner Research 2021.

1.12 COMMUNICATION

A plethora of organisations are available, including services within the Council that can provide advice and support to individuals and households in need throughout the County. A vast range of voluntary organisations such as Citizens Advice Bureau, Age Concern Cymru, and Shelter Cymru and other members of Advice and Support Carmarthenshire (ASC).

Advice and Support Carmarthenshire was originally created by Trading Standards and Citizens Advice Bureau in 2002 and re-launched in 2008 to provide a network/ forum enabling private sector/voluntary organisations to work collaboratively, share information and support people in an effective manner through referrals mechanisms.

- **The group noted that the Advice and Support in Carmarthenshire forum and directory had sadly since become redundant and that this was a great lost to the community.**

2.0 METHODOLOGY

Through a series of meetings, Task and Finish Group Members gathered information on the FESS initiative and undertook a comprehensive review covering areas including financial exploitation and the various projects that make up FESS.

The methodology applied incorporated various techniques which included a mixture of qualitative and quantitative methods, drawing upon data received from the Carmarthenshire County Council Trading Standards department and face to face discussions with partners and Dyfed Powys Police representatives.

Initially, it was planned that that the review would be completed in 8 meetings between September 2019 and April 2020. Unfortunately, in March 2020, further meetings were suspended with the production of the report being delayed due to the unprecedented impact of Covid-19 and resuming in February 2021.

3.0 KEY FINDINGS

In order to set the scene, Group Member received a comprehensive and interactive presentation detailing the history of FESS, which is outlined on pages 11-16 within this report.



3.1. DISCUSSIONS WITH PARTNER ORGANISATIONS

Trading Standards department deal with many organisations in relation to the individual FESS initiatives.

In order to enable Group Members to glean information in relation to the current awareness level of our partners with regard to the FESS initiative, integration of services and the effectiveness of the current information sharing processes, operational staff members from each partner organisation were invited to a meeting.

Each Member of the Group held a one-to-one discussion with a Partner, which provided a comfortable setting to get the most out of the session.

The discussions highlighted that whilst some stakeholders had good grasp of the FESS initiative there were some that would benefit from further information and interaction with the Trading Standards team.

3.2 TRUECALL© NUSIANCE CALL BLOCKER: PRESENTATION AND DEMONSTRATION

Group Members were provided with a practical demonstration of how the trueCall© system operated within households and a comprehensive and informative presentation was delivered by Mr Steve Smith, Director of trueCall© which included detailed costs and benefits of the project.

It was estimated that the project had already prevented 77 scams and made savings of £274,805. Over a 5-year life of the units they would have blocked 217,615 nuisance calls (of which 43,775 would have been scam phone calls), prevented 258 scams, saved vulnerable households £408,902 and led to a reduction of £435,188 in NHS and health and social care costs
[See Appendix C for a cost analysis.]

- **In light of the information received, group members could see significant value in the units and were encouraged by the figures and future financial savings that could be generated by further investment in the project.**



3.3 CASE STUDIES

Trading Standards Officers provided the Task and Finish Group with four consumer case studies, to provide an insight into some of the issues officers regularly come up against.

Officers explained the background of each case study and highlighted the identified issues and how the Trading Standards was able to assist the consumer with their issues within the standard Trading Standards Consumer Protection/ Enforcement remit and how Officers assisted consumers by undertaking social support work outside of their core remit using contacts and other known services developed through the FESS initiative.

In depth discussions took place between the Group Members and Officers in relation to the facts and investigation of the following cases:

Case Study 1: – Plumbing complaint (CACS)

	Issues identified	What TS Did
TS Remit	<ul style="list-style-type: none"> Referred as a vulnerable consumer requiring immediate assistance. Allegation that T mis-sold LPG gas installation. Potential breaches of criminal legislation (The Consumer Protection from Unfair Trading Regulations 2008). 	<ul style="list-style-type: none"> ✓ Investigated potential breaches of consumer protection legislation but none found. ✓ Negotiated a civil resolution to the consumer's complaint.
Outside TS Remit	<ul style="list-style-type: none"> C could not afford to buy more fuel due to financial issues. C's property required insulating / state of disrepair. Evidence of drug use and anti-social behaviour at the C's property - Concern for C's welfare. Gas cooker condemned and C could not afford to top-up her electricity. C suffered from several health conditions 	<ul style="list-style-type: none"> ✓ Referred C to Housing Options. ✓ Contacted the Police regarding the potential criminal behaviour. ✓ Supplied C with basic groceries and topped-up her electricity card. ✓ Referred C to the Citizens Advice Bureau (CAB) for debt advice and access to emergency funds. ✓ Referred C to NEST and Care & Repair. ✓ Referred C to Social Services.

Case Study 2: – Identity theft (Adult Safeguarding Team)

	Issues identified	What TS Did
TS Remit	<ul style="list-style-type: none"> Referred as a vulnerable consumer / victim of alleged fraud Potential harassment from debtors. Potential selling of counterfeit products (remit but no jurisdiction). 	<ul style="list-style-type: none"> ✓ Obtained Action Fraud Reference number and contacted a number of creditors on C's behalf ✓ Investigated potential harassment from debtors but none found. (Consumer Credit Act 1974).
Outside TS Remit	<ul style="list-style-type: none"> Various medical issues dealt with by district nurse. The investigation of certain Frauds – identity theft (Police). C required financial/debt advice (could seek advice from CAB). Fraudulent companies needed investigating (Companies House – but lack of administrative powers). 	<ul style="list-style-type: none"> ✓ Supported the C in contacting creditors to report the fraud. ✓ A TS Financial Investigator investigated fraudulent companies and passed their findings to the Police. ✓ TS sought the relevant forms from Companies House and supported the C in completing and returning these.

Case Study 3: – Contracted but potentially lacked capacity (Family member)

	Issues identified	What TS Did
TS Remit	<ul style="list-style-type: none"> Referred as a vulnerable consumer. Chronic financial exploitation/abuse victim. Potential breaches of consumer protection legislation (The Consumer Protection from Unfair Trading Regulations 2008). 	<ul style="list-style-type: none"> Investigated potential breaches of consumer protection legislation but none found. Contacted the T's home authority due to the large volume of complaints received regarding them.
Outside TS Remit	<ul style="list-style-type: none"> Potentially lacked capacity. Various health issues including memory loss. The complaint was impacting on the C's health and wellbeing. 	<ul style="list-style-type: none"> Conducted a welfare visit accompanied by the police. Arranged for the C to seek legal advice. Arranged for a Debt & Mental Health Evidence Form to be completed. Supported the C during negotiations with the T.

Case Study 4: – Substandard work (CACS)

	Issues identified	What TS Did
TS Remit	<ul style="list-style-type: none"> Referred as a vulnerable consumer (warm transfer) Repeat victim. Potential breaches of consumer protection legislation (The Consumer Protection from Unfair Trading Regulations 2008). 	<ul style="list-style-type: none"> Investigated potential breaches of consumer protection legislation which resulted in the successful prosecution of the T. Instructed a chartered surveyor to assess the quality of the work conducted.
Outside TS Remit	<ul style="list-style-type: none"> The C was living amongst boxes of furniture which posed a safety risk. Disabled and in need of care (sister initially provided this but was later unable to). The C had various health issues including being distressed and anxious. The C expressed suicidal thoughts on numerous occasions & attempted suicide 	<ul style="list-style-type: none"> Moved boxes to ensure a clear escape route. Contacted the C's Community Psychiatric Nurse, Social Services & Safeguarding on various occasions due to concerns about the C's welfare. Instructed Care & Repair on the C's behalf. Sign-posted to housing options Arranged for refuse collection from doorstep (as outside Social Services' remit)

The case studies presented proved very informative and prompted much discussion among the review panel and provided much insight and context to the work and motivation of Trading Standards Officers working on the FESS initiative.

- The group were heartened by the care and concern provided by officers to victims (in one instance Officers had actually used their own money to top up a vulnerable persons electricity meter) and the group were generally impressed by the level of care and willingness to go the extra mile evidenced by the case studies.

The exercise provided a catalyst for members of the review panel to attend live site visits with Officers.

3.4 MEETING WITH REPRESENTATIVES FROM DYFED-POWYS POLICE

In order to obtain wider view of the provision of fraud enforcement, prevention and support arrangements in the Carmarthenshire, it was important that the group obtain information on the matter from from the perspective of Dyfed Powys Police.

The Group invited Mr Dafydd Llywelyn, Police and Crime Commissioner, Chief Superintendent Steve Cockwell and Head of Crime Paul Callard, Manager – Economic Crime Team to its meeting on 5th March 2020 to discuss the subject of fraud.

The following Trading Standards Officers were also present:

Huw Lloyd (Lead Officer Fair Trading)
Heidi Neil (Senior Consumer Protection Officer).

In order to get the most from the meeting, the Group, prior to the meeting, provided the attendees with a brief on FESS and a series of questions.

During the discussions, the police representatives raised the following actions which would benefit the function and purpose of FESS going forward as well as improve communication between services:

- A planned monthly open-dialogue between LA's Trading Standards Departments within the DPP area and the Police– via conference call.
- Police Engagement Officers and the Enablement Police Teams (4 areas) to make themselves known to Local Councillors.
- Enable Trading Standards department to provide training to Police Officers.

The notes of the meeting are located at Appendix E.



3.5 DATA SHARING: WHAT ARE THE ISSUES?

It was acknowledged that whilst sharing information with other organisations is fundamental to good practice in safeguarding adults as long it is the right information, at the right time, with the right people, it was also highlighted as a challenging and difficult area of practice.

The areas of the police force and Local Authority Trading Standards are often not coterminal and may have different IT systems, thus making the sharing of information a complex practice.

However, the law does not prevent the sharing of sensitive, personal information between organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented. The difficulties seem to stem with the Data Controllers of the organisation.

3.6 WHAT WAS IDENTIFIED?

It is fair to say that there is a significant amount of work being undertaken by both the Police and Trading Standards to identify fraud, train others, reduce fraud, prevent fraud from happening and support victims of fraud. However, whilst the approaches and initiatives assembled are similar in some instances, they are operated independently.

During the meeting, both the Police representatives and Trading Standards recognised that in order to provide a more consistent and coordinated response to financial exploitation there should be an enhanced engagement with both Operation Signature and FESS in future.

In order to improve links between the Police and Trading Standards Departments, the Economic Crime Manager offered to facilitate a monthly conferencing call consisting of Dyfed Powys Police and all Local Authority Trading Standards within the DPP area.

- **The group were disappointed to note that at the time of publication/writing that conference call arrangements had not been forthcoming.**

In relation to the Action Fraud line, it was reported to Group Members that there had been issues with the Action Fraud line, whereby it was difficult for a victim to get through on the line and there was a delay in the service. Dyfed-Powys police having recognised this were keen to provide a more 'local' service for the people within the police area and were currently in discussions to create an improved service.

The meeting generated much discussion and debate and provided respective organisations with much insight into the work of the other – the meeting provided a valuable insight into the wider UK Government strategy response to fraud enforcement, prevention and support.

The Group was provided statistics for the Dyfed Powys region and indicated that much fraud data and referrals comes from the City of London Police contact Centre (Action Fraud) with whom they appreciate there had been some issues. (See Fig 2).

3.7 SITE VISITS

On the 25th November, 2019 two members of the group accompanied a Trading Standards Officer on a site visit to the home of a vulnerable consumer.

The consumer in question had engaged with a local contractor to replace her roof. However, as a result of poor workmanship the property had been left in squalor and the work was not compliant with Building Regulations. Furthermore, due to the state of the property the consumer was residing on site in a caravan with very little facilities.

The Councillors were briefed on the ongoing criminal investigation by Trading Standards and informed on the involvement of other organisations/partners that Trading Standards had engaged with to support the victim - Citizens Advice Bureau, Housing, Building Control, Nest etc.

During the visit the Councillors were able to gain an insight into the work and support mechanisms provided by Trading Standards and were also able to speak to the consumer and gain an insight into the impact the matter was having on them.

The group member was shocked by the state of the property, the conditions within which the vulnerable person was living in and how low and distressed the victim was because of the issues.

- **The group member was moved to tears stating: “I was lost for words when visiting the victim at her property, I felt so sorry for all the victim was going through with regards the works not being done at the property. I held back my tears which was hard throughout the visit. I showed compassion to the victim by giving them a hug and I thanked the victim for allowing us to visit her property. She was on my mind for the rest of the day and night.”**

3.7.1 MONEY WISE

Money Wise is a web-based bi-lingual financial education programme, developed by Trading Standards in 2009. The lessons cover themes such as qualifications and employment, payslips and income tax, budgeting, consumer credit and consumer rights.

On 3rd December 2019, members of the group attended a training session for 10 primary school teachers delivered by Trading Standards officers. The training included a guide for teachers on navigating the website, an overview of the activities for pupils, how those activities meet the Key Stage 2 curriculum, and suggestions for extension and differentiated activities.

The session and the resources were very well received by the teachers in attendance, who commented on how comprehensive the teacher guide is and how visual and engaging the resources. [Moneywise: Carmarthenshire County Council Trading Standards](#)

- **The group member was genuinely impressed by the Moneywise program and the enthusiasm with which teachers and students alike had embraced it.**

3.7.2 BUY WITH CONFIDENCE LAUNCH

Carmarthenshire Trading Standards signed up as a Local Authority partners to the national trader approval scheme, Buy with Confidence (BWC) in 2018. Prior to that, the section had run a local Registered Traders Scheme.

The BWC website lists local businesses that have been vetted by Trading Standards and approved. Businesses are only included once they've completed a series of stringent checks, including a visit by a qualified Trading Standards professional, and those working in and around people's homes will also be criminal record checked. The businesses are regularly monitored by Trading Standards to help ensure consumers continue to receive a quality service.

On 19th February 2020, the Trading Standards hosted the official launch of the scheme in Carmarthenshire. The event provided members with an opportunity to meet Buy With Confidence scheme members and stakeholders and partner organisations both internal and external to Carmarthenshire County Council.

- **The group considered the initiative to be an invaluable tool in the fight against rogue traders and were impressed by the enthusiasm of scheme members who were very positive about the relationship with Trading Standards and how the initiative helps drive up standards.**

Buy with Confidence initiative has continued to attract new members during the Pandemic. Trading Standards Officers in Carmarthenshire have been tasked with enforcement of the Health Protection (Coronavirus Restrictions) Regulation 2020 and the initiative has helped provide direct Covid -19 compliance advice to scheme members as well as providing a directory of trusted traders to undertake Covid-Safe Essential Services.

<https://www.buywithconfidence.gov.uk/>



3.8. COVID -19 AND FESS:

Sadly, the pandemic has provided opportunities for criminals to exploit persons who may be more exposed to fraudulent approaches due to lockdown/shielding and isolation from support networks.

The Office of National Statistics report that the (COVID-19) pandemic is likely to have had differential effects on trends in fraud offences as a result of lockdown restrictions. For example, data from Action Fraud showed a 27% increase in "online shopping and auctions" fraud in the latest year (to 77,670 offences), which could be accounted for by the increase in online shopping. The data also showed a 17% decrease in "other advance fee" fraud (to 26,080 offences), which could be attributed to a reduction in holiday fraud figures as fewer holidays were booked. However, it is too early to say whether this is evidence of a change to longer-term patterns.¹⁶

[COVID-19 related scams - news and resources | Action Fraud](#)

[COVID-19: Fraud | Europol \(europa.eu\)](#)

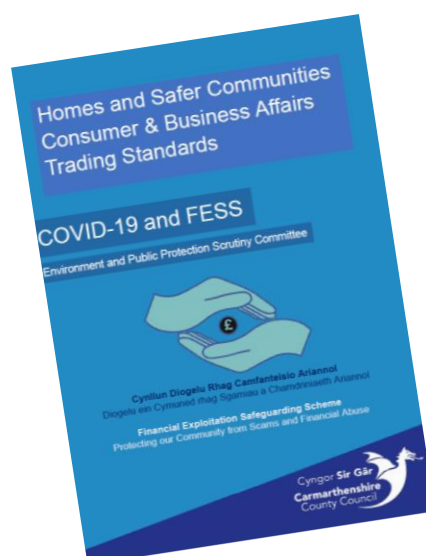
[Scams hit highest number on record in 2020 - but more than half of people who fall victim don't report them | UK News | Sky News](#)

[Fraud epidemic 'is now national security threat' - BBC News](#)

The FESS initiative quickly adapted to working at a distance and focusing on welfare calls, direct mail shots and providing enhanced support to our most vulnerable residents and as part of the review the group were provided with a comprehensive report/ presentation into the work the team undertook in response to the pandemic.

- **The group felt that the information contained within the FESS and COVID-19 report was so informative that it be presented to all members of the Environmental and Public Protection Scrutiny Committee and was added to the agenda for 3rd March 2021.**

The report on FESS and Covid-19 is located at Appendix F



¹⁶ Crime in England and Wales Year Ending September 2020 - [Crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

4.0 CONCLUSIONS

After all the evidence was collated the following conclusions were drawn:

The FESS initiative created by Carmarthenshire Trading Standards provides an invaluable service which protects the communities from scams and financial abuse, generates significant consumer savings and wider social and economic cost saving benefits for health and social care.

The initiative has received many awards since its implementation and been promoted with high level policy stakeholders and this provides testament to the value of the initiative within and to the authority.

FESS fulfils key requirements of the Social Services and Wellbeing (Wales) Act 2014 and contributes to the Councils vision and overall well-being objectives in compliance with Wellbeing of Future Generations Act 2015.

The current level of resources was a concern in terms of staff and the reliance on income derived from asset confiscation under the Proceeds of Crime Act 2002

There was clear evidence that the trueCall© project safeguards the elderly and vulnerable persons from becoming a victim of fraud and also provides wider social and economic cost saving benefits to health and social care services and that further investment into the trueCall© project (extending it to all elderly and vulnerable throughout Carmarthenshire) would be outweighed by the benefits.

Financial exploitation is a very significant issue particularly in the wake of the Pandemic and that it was key for agencies to tackle the issue by working together.

Since the scheme's introduction, the initiative has formed some good collaborative working practices between agencies in Carmarthenshire, however it was noted that this could be improved upon given more resources.

Given the resources available FESS provides a robust support structure which was corroborated through case studies and site visits to victims of fraud.

Since the scheme's introduction, the initiative has delivered a series of training sessions for community groups throughout the County, in order to raise awareness of financial exploitation and this could easily be strengthened by utilising alternative Council sources.

Group Members were explicit in their opinion that all Members of Carmarthenshire County Council should take positive steps to be Champions of FESS by actively promoting the scheme.

Overall, it was acknowledged that there are barriers hindering implementation both internally and externally, however, it was apparent to the group that it was essential to be able to share safeguarding information due to the potential risks of not sharing it:

Whilst currently the usual practice is to 'refer' identified victims, this is a reactive measure rather than preventative and it all Group Members appreciated that the proactive approach FESS takes in identifying and supporting victims of financial abuse and are very much of the mind that prevention is better than cure.

The meeting held with the representatives from Dyfed Powys Police was both interesting and informative. Through discussion it was revealed that the comparisons between the work that the Police undertake and the FESS initiatives were similar albeit the types of fraud investigated by the respective agencies could be more clearly defined.

It was recognised that there was a breakdown in communication links between the Police and Trading Standards that could in some instances cause duplication in methods and workload.

The collapse of the Advice and Support Carmarthenshire (ASC) network was deemed as unfortunate and through discussions between Group members and Trading Standards staff, it was established that a reinvestment into the network could prove to aid an exchange of information and assist to promote services.

It is fair to say that the Carmarthenshire Trading Standards have pioneered many significant projects over the years, many of which pre-empt policy and legislative developments by some 15 years and in some instances, the initiatives have gone on to contribute to the creation and development of new services and policy locally and nationally.

In addition to their core statutory duties, Trading Standards provide an invaluable authority service, which like a golden thread, touches upon all aspects of our lives and authority services. The team have proven themselves adaptable, versatile, creative and willing to innovate and encourage a culture of research and development to improve services and make things work better.

The group were unanimous in the view that the FESS initiative is sufficiently robust, consistent, coordinated, provides measurable outcomes and presents value for money and would deliver even greater social and economic cost saving benefits to the community through further investment and development.

5.0 RECOMMENDATIONS

Task and finish group have undertaken extensive research on the current Financial Exploitation and Safeguarding Scheme devised by Carmarthenshire County Council's Trading Standards department and as a result propose that the Executive Board approve the following seven recommendations:

Recommendation One

That Trading Standards continues with its FESS initiative which supports the Council's well-being objectives and in leading the local authority response to financial exploitation, prevention, detection, education and enforcement.

Associated Cost Implications

No Additional Costs

Implementation Long/Medium/Short Term

Short Term

Recommendation Two

That training packages in relation to financial exploitation and the FESS initiative are created and formally incorporated into the learning and development plan of all relevant authority employees and Councillors and that FESS be presented by way of an annual Members Seminar.

Associated cost implications

CCC Staff Resource

Implementation Long/Medium/Short Term

Short Term

Recommendation Three

Further links should be created between Trading Standards and the Marketing and Communications teams regarding the FESS initiative to ensure greater prominence is given to fraud prevention via the Council Web Site and social media platforms and explore alternative ways of reaching the digitally excluded.

Associated cost implications

CCC Staff Resource

Implementation Long/Medium/Short Term

Short Term

Recommendation Four

That the County Council gives the issue of financial exploitation greater prominence within the organisation by:

- a. Securing its inclusion in corporate strategy and policy documents in relation to fraud and financial abuse.
- b. Creating a Performance Measure to capture the scale and scope of fraud reported to the County by its consumers and businesses.

Associated cost implications

CCC Staff Resource

Implementation Long/Medium/Short Term

Short/Medium Term

Recommendation Five

That the County Council seeks to safeguard, increase and consider developing budget streams so that the FESS initiative can continue to be sustainable and protect consumers and businesses in Carmarthenshire from financial exploitation/harm.

Associated cost implications

Additional Staff Resource

Implementation Long/Medium/Short Term

Medium Term

Recommendation Six

That the former Advice and Support in Carmarthenshire (ASC Network) of key public, private and 3rd sector stakeholders for example Social Services, Dyfed Powys Police, Citizens Advice Bureau and other Private and 3rd Sector partners is resurrected and sufficiently resourced to promote financial safeguarding practice, advice and support.

Associated cost implications

CCC staff resource

Implementation Long/Medium/Short Term

Medium Term

In order to monitor the progress of the recommendations, an action plan will be devised and managed through the in house developed Performance Information Monitoring System. A progress report will be monitored by the Environmental and Protection Scrutiny Committee.

The outcomes of the recommendations will also be reported to the Executive Board and Council within the Corporate Strategy Performance Monitoring Report.

6.0 APPENDICES

- Appendix A Moneywise
- Appendix B Don't Get Caught Scam Awareness Campaign
- Appendix C trueCall© Cost Saving Benefit Analysis
- Appendix D Financial Exploitation Safeguarding Scheme (FESS) - Pilot Study -Trading Standards Integration 1
- Appendix E Notes of the Task and Finish Group meeting with Dyfed Powys Police Representatives 5th March 2020
- Appendix F Report on FESS and Covid-19

7.0 REFERENCES

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