

To: Communities, Housing and Planning Policy Board

On: 15 March 2022

Report by: Director of Communities and Housing Services

Heading: Financial Harm Strategy 2022 - 2025

1. Summary

- 1.1. Financial harm is the risk of experiencing, or the actual perpetration of, financial abuse by whatever means, including theft, fraud, forgery or exploitation. It can involve people being put under pressure in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.
 - 1.2. The methods used in the commission of financial harm are complex, varied and often extremely deceptive and manipulative. Many people who fall victim to financial harm are otherwise unknown to agencies and are not in other ways vulnerable or easily coerced.
 - 1.3. A Financial Harm Sub-Group has been established to ensure the engagement of key stakeholders in the protection of adults at risk of financial harm. The Financial Harm Sub-group reports to the Community Protection PREVENT Steering Group reflecting the broad community protection relevance of financial harm and the frequent links to organised criminality. Relevant updates are also provided to the Renfrewshire Adult Protection Committee on a quarterly basis. A full terms of reference and proposed Financial Harm Strategy are attached as appendix 1 for the approval of members of this Board.
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2. Recommendations

- 2.1 It is recommended that the members of the Communities, Housing and Planning Policy Board:
 - (i) approve the Council's Financial Harm Strategy 2022 – 2025 as detailed in appendix 1 to this report; and
 - (ii) note the Financial Harm Strategy action plan will be completed by the Financial Harm Sub-Group following approval of the strategy.
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3. Background

3.1 Financial crime and financial harm is increasing in the UK and in Scotland. Renfrewshire reflects this and has also identified an upward trend in the commission of financial harm across the region.

3.2 Whilst not an exhaustive list, the following modes of harm have all been experienced in Renfrewshire, demonstrating the complexity of perpetration, the broad nature of the opportunities pursued by perpetrators and as a result the wide spectrum of people who may fall victim to harm within our communities.

- Direct “mass-media marketing” scams (mail, email, text, phone calls)
- Rogue traders
- Indirect marketing scams e.g. fake competitions, website pop-ups
- Personal cold callers / Bogus workmen
- Befriending for the purpose of committing crime
- Inter-familial abuse of trust
- Premeditated targeting of individuals at their home address
- Opportunistic crime within residential areas, town centres and shopping centres
- Sextortion scams
- Falsely claiming to be a friend/associate to acquire sensitive information
- Misuse of funds by a known associate or proxy
- Computer/TV/Telephone maintenance scams
- Financial proxy withholding care home fees; not paying bills; and/or not releasing funds for necessary purchases
- “Cuckooing:” taking advantage of a person at risk of harm by taking over their house and abusing their hospitality; using intimidating behaviour to obtain money, food, or other items.

3.3 A Financial Harm Sub-Group, reporting to the Community Protection (Prevent) Steering Group has been established to ensure the engagement of key stakeholders in the protection of adults at risk of financial harm. The sub-group includes members from a range of relevant public and third sector agencies. Some of the key areas of focus for the sub-group will be to:

- Create a network to support the recognition of financial harm, its impact on the individual, community and local economies as well as actions which can be taken to respond to and prevent financial harm.
- Broker and provide operational and strategic advice around issues being faced by organisations and their staff on complex cases involving financial harm (via the network) essentially creating a community of expertise on which all organisations can draw.
- Develop private and third sectors’ understanding of which agencies can provide assistance in which circumstances, in order that concerns can be directed to those best placed to offer advice and assistance.
- Locate and share best practice across and between sectors, encouraging the replication of successful systems within the public, private and third sectors.

- Facilitate collaborative working, including communication, information sharing, good practice, training and activities with stakeholders.
- Inform any publicity campaigns and awareness programmes to ensure that consistency of message is achieved.

3.4 The draft Financial Harm Strategy aims to set out ways partner agencies and communities can work together to prevent financial harm; report it and support those affected. It details actions and work with a focus on the five “E’s” under which objectives are defined and managed.

- **Early Intervention and Prevention** – Optimising positive action at the first point of contact and ensuring facilities such as the Multi-Agency Community Safety Partnership Hub act as key conduit for all agencies to share information and agree early action
- **Education** – Raising awareness of financial harm and the associated risks through effective multi-agency communications and joint training
- **Enforcement** – Heightening awareness amongst enforcement agencies, robust information sharing, intelligence gathering around criminals and their methods and the development of trigger plans to maximise the disruption and apprehension of perpetrators
- **Engagement** – Ensure communities of Renfrewshire are informed about risks, feel safe and are equipped to identify and avoid financial harm
- **Engineering** – Identifying opportunities to safeguard by design for individuals and within organisations

3.5 During the first year of the strategy there will be a specific focus on considering the impact of COVID on local communities and their recovery. A financial harm strategy action plan will be completed by the Financial Harm Sub-Group following approval of the strategy.

Implications of the Report

1. **Financial** - none

2. **HR & Organisational Development** – none

3. **Community/Council Planning** –

- **Renfrewshire is Safe** - *Having a Financial Harm Strategy for Renfrewshire, will help protect people at risk of financial harm and will help raise awareness within our communities of the types of frauds & scams and other modes of harm to help prevent them fallen victim to financial harm.*

4. **Legal** – none

5. **Property/Assets** – none

6. **Information Technology** – none

7. Equality & Human Rights - The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.

8. Health & Safety – none

9. Procurement – none

10. Risk – none

11. Privacy Impact - none

12. COSLA Policy Position – none

13. Climate Change - none

List of Background Papers: None

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Renfrewshire Financial Harm Strategy 2022-2025

This Financial Harm Strategy ensures that partners and agencies work collaboratively and efficiently to tackle financial harm in all its guises and wherever it occurs throughout our communities.

About Financial Harm

Financial harm is the risk of experiencing, or the actual perpetration of, financial abuse by whatever means, including theft, fraud, forgery or exploitation. It can involve people being put under pressure in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Financial harm can happen anywhere and is not always perpetrated by strangers. It can be perpetrated by those that are close to the victim and encompass misuse of Power of Attorney, appointee ship, or guardianship; as well as denying access to funds – some perpetrators engage in fictitious romantic relationships to exert emotional control.

The methods used in the commission of financial harm are complex, varied and often extremely deceptive and manipulative. People at risk of financial harm are not restricted to sectors of the community who might already be supported by agencies. Indeed, many people who fall victim to financial harm are otherwise unknown to agencies and are not in other ways vulnerable or easily coerced, however many are older people living independently with savings or assets that have been built up over their working lifetime.

Financial crime and financial harm is increasing in the UK and in Scotland. Renfrewshire reflects this and has identified an upward trend in the commission of financial harm across the region.

Whilst not an exhaustive list, the following modes of harm have all been experienced in Renfrewshire, demonstrating the complexity of perpetration, the broad nature of the opportunities pursued by perpetrators and as a result the wide spectrum of people who may fall victim to harm within our communities.

- Direct “mass-media marketing” scams (mail, email, text, phone calls)
- Rogue traders
- Indirect marketing scams e.g. fake competitions, website pop-ups
- Personal cold callers / Bogus workmen
- Befriending for the purpose of committing crime
- Inter-familial abuse of trust
- Premeditated targeting of individuals at their home address
- Opportunistic crime within residential areas, town centres and shopping centres
- Sextortion scams
- Falsely claiming to be a friend/associate to acquire sensitive information
- Misuse of funds by a known associate or proxy
- Computer/TV/Telephone maintenance scams
- Financial proxy withholding care home fees; not paying bills; and/or not releasing funds for necessary purchases
- “Cuckooing:” taking advantage of a person at risk of harm by taking over their house and abusing their hospitality; using intimidating behaviour to obtain money, food, or other items.

Governance

“Our Renfrewshire” is the Community Plan for the ten-year period 2017-2027 and acts as Renfrewshire's Local Outcome Improvement Plan as required by the Community Empowerment (Scotland) Act 2015. This Financial Harm Strategy links directly to the outcomes and vision it sets out.

Community Plan Vision

“Working together to make Renfrewshire fairer, more inclusive place where all our people, communities and businesses thrive”

Community Plan Priorities

- Our Renfrewshire is thriving: Maximising economic growth, which is inclusive and sustainable
- Our Renfrewshire is well: Supporting the wellness and resilience of our citizens and communities
- Our Renfrewshire is fair: Addressing the inequalities which limit life chances
- Our Renfrewshire is safe: Protecting vulnerable people, and working together to manage the risk of harm

Aligned to this Community Plan vision is the vision of the Renfrewshire Adult Protection Committee:

“In Renfrewshire everyone is committed to keeping adults at risk of harm safe and protected.”

The broad outcome measures of the Renfrewshire Adult Protection Committee are:

- Adults in Renfrewshire are safer, and their wider needs are met as a result of our activity
- Stakeholders' needs are met, and they are engaged in Adult Support and Protection
- Our policies, procedures, and guidance support ASP practice
- Our leadership, governance and learning support staff to perform, keeping adults safe from harm

Focus

A Financial Harm Sub-Group has been established to ensure the engagement of key stakeholders in the protection of adults at risk of financial harm. Since July 2021, the Financial Harm Sub-group's governance forms part of the Community Protection PREVENT Steering Group reflecting the broad community protection relevance of financial harm and the links to organised criminality. Relevant updates are also provided to the Renfrewshire Adult Protection Committee on a quarterly basis and updates are also provided to the Community Protection Chief Officers Group and Member Officers Group: Public Protection when appropriate or requested

The purpose of the sub-group is to:

- Create a network to support the recognition of financial harm, its impact on the individual, community and local economies as well as actions which can be taken to respond to and prevent financial harm.
- Broker and provide operational and strategic advice around issues being faced by organisations and their staff on complex cases involving financial harm (via the network) essentially creating a community of expertise on which all organisations can draw.
- Develop private and third sectors' understanding of which agencies can provide assistance in which circumstances, in order that concerns can be directed to those best placed to offer advice and assistance.
- Locate and share best practice across and between sectors, encouraging the replication of successful systems within the public, private and third sectors.
- Highlight the potential connection between financial harm and other types of harm, raising the overall profile of adult harm in the financial sector and beyond.
- Monitor levels of public, private and third sector engagement, seeking to ensure that all stakeholders embed the 'pledge' in their policies and culture
- Provide a strategic platform to consider issues from public, private and third sectors to support organisations to find solutions to difficulties that arise between and within organisations
- Facilitate collaborative working, including Communication, Information Sharing, good practice, training and activities with stakeholders.
- Inform any publicity campaigns and awareness programmes to ensure that consistency of message is achieved.
- Liaise with influential groups that may be in a position to assist the development of the agenda.
- Identify and collate financial harm data available from stakeholders' databases
- Identify and collate available research and make recommendations to Scottish Government and academic institutions regarding issues that require a future research focus.
- Develop recommendations for public, private and third sector policy/procedures in response to issues arising, consulting with relevant bodies as required.
- Inform the development of a Scottish Government strategy for protecting adults at risk of financial harm through the above tasks.

The full role, remit and membership of the sub-group is attached as Appendix 1 to this strategy together with a copy of the current Action Plan which has been devised to enable all partners to focus and deploy resources to address a wide range of financial harms in Renfrewshire.

The Financial Harm Strategy in Renfrewshire has a focus on delivering under five 'Es' through which objectives are defined and managed.

The Five Es

- Early Intervention and Prevention
- Education
- Engagement
- Engineering
- Enforcement

Early Intervention and Prevention

Optimising positive action at the first point of contact and ensuring facilities such as the Multi-Agency Community Safety Partnership Hub act as a conduit through which agency action can be triggered. Ensuring partners can identify potential criminality and/or financial harm that should trigger an Adult Support & Protection referral and have the mechanisms to report it quickly.

What we want to achieve:

To prevent harm occurring. Perpetrators find it more difficult to carry out financial harm in Renfrewshire and are deterred from operating in the region

How we will achieve it:

- Clear role definition between partners to understand where roles both overlap and diverge.
- Effective information sharing between agencies and partners to ensure early identification of risk and promote confidence around reporting, enhancing safeguarding and preventing crime and non-criminal types of financial harm.
- Effective communication and engagement, empowering local communities to stay safe.
- Working with local social groups, support groups and forums which focus on the more vulnerable sectors of the community through which proactive messages and guidance can be disseminated.
- Remaining flexible and adapting quickly to changing trends, methods of offending or targeted victim profiles locally and nationally.
- Using analytical tools, intelligence, environmental scanning and information sharing to predict where harm may occur and take action to lower the likelihood of people falling victim.
- Using trigger plans in the Banking Protocol, public services, utility providers and local retailers to take action where criminality or harm is suspected.

What we want to achieve

Where harm does occur, respond effectively and efficiently

How we will achieve it

- Robust protocols adopted in each agency to take decisive action at the first point of contact, ensure risks are identified, relevant information is captured, and safeguarding implemented. Inquiries are undertaken under the Adult Support and Protection Act as soon as a risk of harm is brought to the attention of the local authority.
- All partners can/will make Adult Protection referrals when they believe the criteria to be met.
- The Community Safety Partnership Hub will collate potential concerns, identify risk and repeat victims and refer via Adult Protection procedures.

What we want to achieve

Support victims who are harmed

How we will achieve it

- Documented care plan put in place to reduce the fear of crime or harm, improve well-being and reduce the likelihood of repeat victimisation.
- Proactive engagement with other service providers (telephone providers, housing, banks etc.) to trigger the implementation of supportive measures to protect victims and prevent offending.
- Support for victims offered through non-criminal processes, including Adult Support and Protection and investigations by Office of Public Guardian (Scotland)

What we want to achieve

Perpetrators in prison who have committed or who are at risk of committing offences involving financial harm take part in programmes aimed at reducing the likelihood of reoffending.

How we will achieve it

- Work in close partnership with the Scottish Prison Service to identify relevant perpetrators and related risk.
- Share intelligence about modes of offending and known risks involving the perpetrator, their families or the wider community (this intelligence sharing will go beyond perpetrators in prison if they are harmers or at risk of committing offences).

Education

Raising awareness of financial harm and the associated risks through effective multi-agency communication and joint training.

What we want to achieve

Staff within agencies are aware of how financial harm is perpetrated. Staff are aware of associated risks and can identify potential victims and the early indicators of harm.

How we will achieve it

- Implementation of an effective communications strategy to raise awareness amongst staff in all key agencies and partner organisations which includes the early identification of potential risks and indicators of harm.
- Internal communications strategy supported by dissemination of audience-relevant messages through team briefings
- Participation in joint-agency training focused on the risks and impact of financial harm
- Participation from relevant private sector organisations in joint training
- Awareness amongst agencies of available technologies which can reduce the risk of internet and telephone scams, and securing access to those technologies for vulnerable people

What we want to achieve

Staff within agencies know how and where to raise concerns and are confident in doing so quickly

How we will achieve it

- Joint training and internal communication strategies will include policy and procedure around notification of concerns
- Clearly understood lines of reporting will be evident within each agency
- Each agency will implement guidance on taking immediate steps to safeguard, support and prevent crime where potential risks are identified.

Engagement

Providing support and information to vulnerable people, community groups and their families through a number of traditional and innovative channels, making best use of technology, social media and awareness campaigns.

What we want to achieve

Maximise the reach of information and awareness within local communities through a high-profile launch of the financial harm strategy with a focus on keeping people safe across Renfrewshire

How we will achieve it

- Effective use of social media and agency websites.
- Poster campaign in places frequented by vulnerable people, public offices and local retailers.
- Raise awareness through elected members and community councils

What we want to achieve

Raise awareness amongst local communities about the methods used to commit financial harm, key prevention methods and what victims can expect from agencies when a crime does occur, as well as what victims can expect when they are victims of financial harm that is not a criminal act.

Ensure people within Renfrewshire are informed about risks, feel safe and are best placed to avoid harm

How we will achieve it

- Work with social groups, support groups and forums associated with or attended by vulnerable sectors of the community through which proactive messages and guidance can be disseminated.
- Optimise reach through posters and leaflets in GP waiting rooms, hospitals, public buildings, citizens' advice offices, banks, day centres, garden centres, supermarkets and other retailers.
- Encourage partners and utility providers to include relevant messages in correspondence and billing information.
- Pop-up themed public engagement activity at key locations to offer advice, share information and discuss concerns

What we want to achieve

Support victims who have been harmed or who may be at risk of being harmed

How we will achieve it

- Early recognition of risk and the impact that financial harm has on individuals and their families.
- Decisive action taken to report harm or the risk of harm through recognised multi-agency channels.
- Early intervention to safeguard where appropriate.
- Identify named point of contact for the individual.
- Early review of each case to determine the most appropriate lead agency and trigger an appropriate response to ensure long-term well-being.

Engineering

Identifying opportunities to safeguard by design for individuals and within organisations

What we want to achieve

Safeguarding by design

How we will achieve it

- Review of building security at identified locations.
- Consideration of low-cost security measures such as door chains and peep-holes within dwellings occupied by vulnerable people.
- Distribution of relevant leaflets and guidance booklets/toolkits amongst vulnerable people and groups.
- Enhancing awareness amongst agencies of available technologies which can reduce the risk of internet and telephone scams and securing access to those technologies for vulnerable people.
- Promoting best use of pre-agreed passwords which should be used by genuine callers from banks, utility companies and telecommunications companies etc. to reduce the likelihood of vulnerable people falling victim to scams.
- Reviewing ATM security and waiting area/kiosk security within banks, building societies and other outlets to prevent and detect crime.
- Establishing robust triggers within partner agencies' electronic systems to identify possible cases of financial harm early on (e.g., debts attached to an individual with a financial proxy managing their funds).

Enforcement

Heightening awareness amongst enforcement agencies, robust information sharing, intelligence gathering around criminals and their methods and development of trigger plans to maximise the disruption and apprehension of perpetrators.

What we want to achieve

Create a toxic operating environment for perpetrators in Renfrewshire

How we will achieve it

- Robust training and awareness within agencies to maintain heightened readiness amongst staff.
- Effective sharing, gathering and distribution of intelligence relating to known criminals and organised gangs who may seek to operate within Renfrewshire.
- A united partnership approach, with decisive investigative action at the first point of contact where a crime is suspected to have been attempted or has been committed.
- Best use of modern investigative technologies, locally and nationally to optimise the identification of perpetrators.
- Best use of joint investigations where more than one agency can offer expertise and resource in the investigation of financial harm and in the support of victims.
- Enhanced information sharing and agreed protocols with store security and radio-link operatives where suspicious activity is observed or anticipated.
- Best use of joint working agreements and protocols with banks, building societies, benefits agencies, the Office of Public Guardian (Scotland), and other service providers to optimise early reporting, evidence collation and the identification of perpetrators.

What we want to achieve

Perpetrators are brought swiftly to justice

How we will achieve it

- Instances of financial harm are treated as high priority.
- Investigations are expedited efficiently and are overseen by a named supervisory officer.
- Best use of legislative provisions around bail conditions, curfew and investigative liberation in support of victims, and where circumstances permit, ensure perpetrators appear before the court from police custody.
- Liaison with the Procurator Fiscal to ensure that the consequence of harm within the community is reflected in sanctions and disposals for perpetrators at every stage of the justice process. (Perhaps wouldn't qualify as "justice" but something here around taking efficient steps to identify and remove financial proxies who are financially harming victims)

Monitoring and reporting progress

The Financial Harm Sub-Group will monitor outcomes on an ongoing basis with each partner reporting progress at the quarterly meetings. An annual review of the strategy will be undertaken by the Financial Harm Sub-Group enabling the opportunity to review progress and incorporate any emerging issues.

Reports outlining progress achieved against the agreed Action Plan will be submitted to the Community Protection Prevent Steering Group & Adult Protection Committee detailing progress on actions and the positive outcomes achieved.

The annual progress report will also highlight areas where progress has not been achieved and the appropriate measures that will be undertaken agreed by the Financial Harm Sub-Group to ensure completion of actions. The report will also highlight emerging/new financial harm identified to be incorporated into an updated Financial Harm Action Plan for the next year.

Partners will ensure that annual progress is reported widely across their reporting structures and is widely accessible on a wide range of media channels such as websites highlighting the positive outcomes being achieved within Renfrewshire and raising awareness of potential new or emerging financial harm. To ensure wider communication of Financial Harm key messages will be highlighted in the relevant partners Service Plans.

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Appendix 2 – Renfrewshire Financial Harm Terms of Reference



Renfrewshire Financial Harm Sub-group Terms of Reference

Introduction

There is a need to ensure the engagement of key stakeholders in the protection of adults at risk of financial harm. The majority of organisations with a role are not bound by the terms of Adult Support and Protection legislation (ASPA) and also the regulation of financial services is a reserved matter for the UK Government.

Previous work has identified that to respond to the growing threat of financial harm there is a need to influence the policies of a range of organisations, including financial services and companies that are recognised as being key stakeholders in the protection of adults who are exposed to the risk of financial harm. This also extends to those providing broader services within the private and third sectors.

The Renfrewshire Financial Harm Working Group was previously operating under the auspices of the Renfrewshire Adult Protection Committee (RAPC). Since July 2021, the Financial Harm Sub-group's governance forms part of the Community Protection PREVENT Steering Group rather than RAPC, reflecting the broader public protection relevance of financial harm. Relevant updates will continue to come to RAPC on a quarterly basis.

Links with other public protection bodies that have an interest in this work are being developed, and cohesive work will continue to develop these over time.

The Financial Harm Sub-Group reports to the Community Protection PREVENT Steering Group and provides updates to the Community Protection Chief Officers Group and Member Officers Group: Public Protection when appropriate or requested

The following terms of reference set out the intended function, constitution and membership of the sub-group.

Purpose

- Create a network to support the recognition of financial harm, its impact on the individual, community and local economies as well as actions which can be taken to respond to and prevent financial harm.
- Broker and provide operational and strategic advice around issues being faced by organisations and their staff on complex cases involving financial harm (via the network) essentially creating a community of expertise on which all organisations can draw.

- Develop the private and third sectors' understanding of which agencies can provide assistance in which circumstances, in order that concerns can be directed to those best placed to offer advice and assistance.
- Locate and share best practice across and between sectors, encouraging the replication of successful systems within the private, public and third sectors.
- Highlight the potential connection between financial harm and other types of harm, raising the overall profile of adult harm in the financial sector and beyond.
- Monitor levels of public, private and third sector engagement, seeking to ensure that all stakeholders embed the 'pledge' in their policies and culture
- Provide a strategic platform to consider issues from public, private and third sectors to support organisations to find solutions to difficulties that arise between and within organisations
- Facilitate collaborative working, including Communication, Information Sharing, good practice, training and activities with stakeholders.
- Inform any publicity campaigns and awareness programmes to ensure that consistency of message is achieved.
- Liaise with influential groups that may be in a position to assist the development of the agenda.
- Identify and collate financial harm data available from stakeholders' databases
- Identify and collate available research and make recommendations to Scottish Government and academic institutions regarding issues that require a future research focus.
- Develop recommendations for public, private and third sector policy/procedures in response to issues arising, consulting with relevant bodies as required.
- Inform the development of a Scottish Government strategy for protecting adults at risk of financial harm through the above tasks.

Membership

The sub-group will comprise representatives from a range of key stakeholder organisations and be chaired by the Resilience and Deployment Manager or by the Serious Organised Crime & Trading Standards Manager

In order to avoid an unnecessarily large number of agencies, membership will be restricted to those with a representative function:

Title	Organisation	Membership Rationale
Resilience and Deployment Manager	Public Protection	Representing the interests of Community Protection
Adult Protection Committee Lead Officer	RAPC	Providing strategic input
Trading Standards	Public Protection	Providing strategic input for Trading Standards
NHS Greater Glasgow and Clyde Health Board	NHS Health Board	Representing strategic health care interests and training agenda
Social Work Representation	Renfrewshire Health and Social Care Partnership	Representing frontline experience in working with adults at risk of harm
Local Chief Inspector/ Detective Sergeant	Police Scotland and Renfrewshire Inverclyde Safer Communities	Representing interests of Police Scotland
Policy Officer or Senior Manager	Relevant local third sector agencies	Representing voluntary sector interests, including Citizens Advice Bureau

Policy Officer or Senior Manager	Relevant financial institutions and credit unions	Representing financial institution and credit union interests
Policy Officer or Senior Manager	Renfrewshire Community Planning Partnership	Representing strategic Council and Community Planning agenda
Police Officer or Senior Manager	Postal Service	Representing Postal Service interests
Refuge Worker & IDAA	Woman's Aid	Representing Victims of Domestic Abuse

As necessity arises other specialists may be co-opted onto the strategy group for specific or general purposes e.g., Office of Public Guardian Scotland, Crown Office and Procurator Fiscal Service. This will be a matter for core members of the group to determine. Members may invite representatives from other organisations to share relevant information.

Accountability/Responsibilities

The sub-group will report to the Community Protection PREVENT Steering Group and provide regular updates on progress to the Renfrewshire Adult Protection Committee. The sub-group will submit a written report annually on levels of private/public sector collaboration, achievements against targets set out in the strategy, forecasts for forthcoming years and any issues relating to statutory, organisational or operational difficulties. The sub-group will advise on and promote relevant policy and strategy as well as articulating issues and concerns raised in the adult protection community and broader financial harm prevention community with all stakeholders.

The sub-group will maintain a close working relationship with the Community Protection PREVENT Steering Group and Adult Protection Committee and will disseminate any relevant guidance.

Working Methods

The quorum for the sub-group and any decisions will be 5 core members from different agencies. The sub-group will meet a maximum of 6 times per annum. Minutes will be kept of meetings and circulated to stakeholders within three weeks following each meeting.

The Chair of the sub-group will be the Resilience & Deployment Manager or Serious and Organised Crime & Trading Standards Manager. Secretariat functions will be provided by the Community Safety Partnership.

Specialist Advisors

When considered appropriate the sub-group will request the support of specialist advisors.

Review

On an annual basis the sub-group will review the relevance and value of its work with the Community Protection PREVENT Steering Group and the Renfrewshire Adult Protection Committee. This will include reviewing membership, remit and responsibilities

(Terms of Reference adapted from the National Financial Harm Group's Terms of Reference Guidance for local groups)

Appendix 3 – Action Plan

Date of last update:		6th September 2021				NOT PROTECTIVELY MARKED	
Renfrewshire Financial Harm Sub-Group							
Action Plan							
The Financial Harm Strategy in Renfrewshire will focus on five ‘Es’ under which objectives are defined and managed.							
1	Early Intervention and Prevention	Optimising positive action at the first point of contact and ensuring facilities such as the Multi-Agency Safeguarding Hub act as a conduit through which agency action can be triggered. Ensuring partners can identify potential criminality and/or financial harm that should trigger an Adult Support & Protection referral and have mechanisms to report it quickly.					
Objective Number	Objective	Action	How to achieve	Lead Assigned to	Progress notes	Due date	Status
1.1	To prevent harm occurring. Perpetrators find it more difficult to carry out financial harm in Renfrewshire and are deterred from operating in the region	a) Clear role definition between partners to understand where roles both overlap and diverge.					
		b) Effective information sharing within agencies and partners to ensure early identification of risk and promote confidence around reporting, enhance safeguarding and prevent crime and non-criminal types of financial harm.					
		c) Through effective communication and engagement, empower local communities to stay safe.					
		d) Identify local social groups, support groups and forums which focus on the more vulnerable sectors of the community through which proactive messages and guidance can be disseminated.					

		e) Remain flexible and adapt quickly to changing trends, methods of offending or targeted victim profiles locally and nationally.					
		f) Use analytical tools, intelligence, environmental scanning and information sharing to predict where harm may occur and take action to lower the likelihood of people falling victim.					
		g) Trigger plans in the Banking Protocol, public services, utility providers and local retailers to take action where criminality or harm is suspected.					
1.2	Where harm does occur, respond effectively and efficiently	a) Robust protocols adopted in each agency to take decisive action at the first point of contact, ensure risks are identified, relevant information is captured, and safeguarding implemented. Inquiries are undertaken under the Adult Support and Protection Act as soon as a risk of harm is brought to the attention of the local authority.					
		b) All partners can/will make Adult Protection referrals when they believe the criteria to be met.					
		c) The Community Safety Partnership Hub will collate potential concerns, identify risk and repeat victims and refer via Adult Protection procedures.					
1.3	Support victims who are harmed	a) Documented care plan put in place to reduce the fear of crime or harm, improve well-being and reduce the likelihood of repeat victimisation.					
		b) Proactive engagement with other service providers (telephone providers, housing, banks etc.) to trigger the implementation of supportive measures to protect victims and prevent offending.					
		c) Support for victims offered through non-criminal processes, including Adult Support and Protection and investigations by Office of Public Guardian (Scotland)					

1.4	Perpetrators in prison who have committed or who are at risk of committing offences involving financial harm take part in programmes aimed at reducing the likelihood of reoffending.	a) Work in close partnership with the Scottish Prison Service to identify relevant perpetrators and related risk. b) Share intelligence about modes of offending and known risks involving the perpetrator, their families or the wider community (this intelligence sharing should go beyond perpetrators in prison if they are harmers or at risk of committing offences.					
2	Education	Raising awareness of financial harm and the associated risks through effective internal multi-agency communication and joint training.					
Objective Number	Objective	Action	How to achieve	Lead Assigned to	Progress notes	Due date	Status
2.1	Staff within agencies are aware of how financial harm is perpetrated. Staff are aware of associated risks and can identify potential victims and the early indicators of harm.	a) Implementation of an effective internal communication strategy to raise awareness amongst staff in all key agencies and partner organisations which includes the early identification of potential risks and indicators of harm.					
		b) Internal communication strategy supported by dissemination of audience-relevant messages through team briefings					
		c) Participation in joint-agency training focused on the risks and impact of financial harm					
		d) Participation from relevant private sector organisations in joint training					
		e) Awareness amongst agencies of available technologies which can reduce the risk of internet and telephone scams, and securing access to those technologies for vulnerable people					
2.2	Staff within agencies know how and where to raise concerns and	a) Joint training and internal communication strategies will include policy and procedure around notification of concerns					

	are confident in doing so quickly	b) Clearly understood lines of reporting will be evident within each agency					
		c) Each agency will implement guidance on taking immediate steps to safeguard, support and prevent crime where potential risks are identified.					
3	Engagement	Providing support and information to vulnerable people, community groups and their families through a number of traditional and innovative channels, making best use of technology, social media and awareness campaigns.					
Objective Number	Objective	Action	How to achieve	Lead Assigned to	Progress notes	Due date	Status
3.1	Maximise the reach of information and awareness within local communities through a high-profile launch of the financial harm strategy with a focus on keeping people safe across Renfrewshire	a) Effective use of social media and agency websites.					
		b) Poster campaign in places frequented by vulnerable people, public offices and local retailers.					
		c) Raise awareness through elected members and community councils					
3.2	Raise awareness amongst local communities about the methods used to commit financial harm, key prevention methods and what victims can expect from agencies when a crime does occur, as well as what victims can expect when they are victims of financial harm that is not a criminal act.	a) Identify social groups, support groups and forums associated with or attended by vulnerable sectors of the community through which proactive messages and guidance can be disseminated.					
		b) Optimise reach through posters and leaflets in GP waiting rooms, hospitals, public buildings, citizens' advice offices, banks, day centres, garden centres, supermarkets and other retailers.					
		c) Encourage partners and utility providers to include relevant messages in correspondence and billing information.					
		d) Pop-up themed public engagement activity at key locations to offer advice, share information and discuss concerns					

3.3	Support victims who have been harmed or who may be at risk of being harmed	a) Early recognition of risk and the impact that financial harm has on individuals and their families.					
		b) Decisive action taken to report harm or the risk of harm through recognised multi-agency channels.					
		c) Early intervention to safeguard where appropriate.					
		d) Identify named point of contact for the individual.					
		e) Early review of each case to determine the most appropriate lead agency and trigger an appropriate response to ensure long-term well-being.					
4	Engineering	Identifying opportunities to safeguard by design for individuals and within organisations					
Objective Number	Objective	Action	How to achieve	Lead Assigned to	Progress notes	Due date	Status
4.1	Safeguarding by design	a) Review of building security at identified locations.					
		b) Consideration of low-cost security measures such as door chains and peep-holes within dwellings occupied by vulnerable people.					
		c) Distribution of relevant leaflets and guidance booklets/toolkits amongst vulnerable people and groups.					
		d) Awareness amongst agencies of available technologies which can reduce the risk of internet and telephone scams and securing access to those technologies for vulnerable people.					
		e) Promote best use of pre-agreed passwords which should be used by genuine callers from banks, utility companies and telecommunications companies etc. to reduce the likelihood of vulnerable people falling victim to scams.					

		f) Review of ATM security and waiting area/kiosk security within banks, building societies and other outlets to prevent and detect crime.					
		g) Establish robust triggers within partner agencies' electronic systems to identify possible cases of financial harm early on (e.g., debts attached to an individual with a financial proxy managing their funds).					
5	Enforcement	Heightening awareness amongst enforcement agencies, robust information sharing, intelligence gathering around criminals and their methods and development of trigger plans to maximise the disruption and apprehension of perpetrators.					
Objective Number	Objective	Action	How to achieve	Lead Assigned to	Progress notes	Due date	Status
5.1	Create a toxic operating environment for perpetrators in Renfrewshire	a) Robust training and awareness within agencies to maintain heightened readiness amongst staff.					
		b) Effective sharing, gathering and distribution of intelligence relating to known criminals and organised gangs who may seek to operate within Renfrewshire.					
		c) A united partnership approach, with decisive investigative action at the first point of contact where a crime is suspected to have been attempted or has been committed.					
		d) Best use of modern investigative technologies, locally and nationally to optimise the identification of perpetrators.					
		e) Best use of joint investigations where more than one agency can offer expertise and resource in the investigation of financial harm and in the support of victims.					
		f) Enhanced information sharing and agreed protocols with store security and radio-link operatives where suspicious activity is observed or anticipated.					

		g) Best use of joint working agreements and protocols with banks, building societies, benefits agencies, the Office of Public Guardian (Scotland), and other service providers to optimise early reporting, evidence collation and the identification of perpetrators.					
5.2	Perpetrators are brought swiftly to justice	a) Instances of financial harm are treated as high priority.					
		b) Investigations are expedited efficiently and are overseen by a named supervisory officer.					
		c) Best use of legislative provisions around bail conditions, curfew and investigative liberation in support of victims, and where circumstances permit, ensure perpetrators appear before the court from police custody.					
		d) Liaison with the Procurator Fiscal to ensure that the consequence of harm within the community is reflected in sanctions and disposals for perpetrators at every stage of the justice process. (Perhaps wouldn't qualify as "justice" but something here around taking efficient steps to identify and remove financial proxies who are financially harming victims)					