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| **Doorstep Crime Project Report 2014/15** |
| National Tasking Group |
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| **Ruth Andrews** |
| **March 2015** |

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**EXECUTIVE SUMMARY:**

1. This report provides an update on the developments in tackling doorstep crime during the financial year 2014/15 and of the work carried out by the Doorstep Crime Project Team tasked by the National Tasking Group and hosted at North Yorkshire Trading Standards Service.
2. The report also reflects the impact of the unprecedented financial constraints facing local authorities, specifically in relation to tackling doorstep crime, and the resulting lack of uniformity in service provision and “postcode lottery” facing victims of doorstep crime.
3. The national survey of trading standards services for 2014/15 has illustrated reductions in the number of local authorities who are able to give high priority to enforcement, intelligence and prevention of doorstep crime, with increases in the number of authorities now giving medium and low priority to these areas. The most marked reductions are in relation to prevention work. (Section 3)
4. The results also illustrate the amount of resource local authorities are able to allocate to tackling doorstep crime, with over **60%** of authorities allocating 10% or less of their total budget. This equates to **60%** of authorities having one or less full time equivalent posts dealing with doorstep crime.
5. The survey has shown that the number of reports of doorstep crime to trading standards for 2014/15 is **17,265**, a marginal increase on the number of reports for 2012/13 and 2013/14.
6. Reporting levels are now believed to be between **1% and 10%**, with only 18% of authorities stating their reporting levels are over 10%.
7. The average amount of financial detriment per consumer is now estimated at **£1,280**, with a total amount of financial detriment per year to consumers of **£22.1m - £2.21bn**.
8. The levels of prosecution of offenders remain unchanged, with an average number of prosecutions of **one defendant per local authority**. Just **15-25%** of authorities are responsible for prosecuting two or more defendants each year.
9. **72%** of authorities are still failing to measure their performance in relation to tackling doorstep crime, with over **85%** of authorities having no targets in relation to reducing the amount of doorstep crime in their areas, increasing reporting and awareness, and safeguarding of victims.
10. There has also been a fall in the amount of data recorded by local authorities in relation to doorstep crime incidents.
11. The work of the project team has now provided evidence in a number of areas, which can be used to influence and lobby government departments and partners.

This includes: an initial indication of the views of the legitimate trade sector on doorstep crime and the impact on their businesses and victims (section 17); evidence of the involvement of Organised Crime Groups in doorstep crime offending and the impact of this level of offending on victims (section 10); the current police response to doorstep crime and victims (section 13); the involvement of doorstep crime Organised Crime Groups in modern day slavery (sections 10 & 13); the opportunities for joint-working with the health sector (section 6); and the need for an Older Person’s Minister and Commissioner, to oversee, amongst many other issues, efforts to protect vulnerable older adults from financial abuse (section 6).

1. The report also highlights the impact of the Care Act 2014 on local authorities and the opportunities this presents for trading standards services, working in partnership with adult services, including in demonstrating the cost savings available where effective safeguarding of vulnerable victims of doorstep crime takes place. (Section 8)
2. For the first time, the report provides detailed evidence of the victim typology for doorstep crime, including the impact of this crime type on victims. (Section 9)
3. The national survey results demonstrate there has been significant increase (**41%**) in the number of intelligence submissions by trading standards concerning doorstep crime. However, concerns remain regarding the quality of the intelligence and the ability currently to identify and tackle those Organised Crime Groups engaged in doorstep crime.
4. The need for local, regional and national intelligence development remains, which should in turn lead to an increase in the number of referrals for tasking being made on a regional and national level, including to Scambuster teams.
5. Three key work areas undertaken by the project team offer options for the development of intelligence relating to Organised Crime Groups engaged in doorstep crime, being: regional trials of intelligence and incident development; analysis of the data held by the National Crime Agency; and requests to regional and local intelligence officers to identify those Organised Crime Groups causing the most harm and detriment in their localities. (Section 10)
6. The national survey results also show reductions in the number of local authorities engaging with the third sector in relation to increasing awareness and reporting of doorstep crime and safeguarding of victims.
7. There are significant moves within the financial sector to improve both engagement with trading standards and also to protect their vulnerable customers. (Section 12)
8. Academic research is now underway to obtain evidence from convicted doorstep crime offenders regarding their tactics, how they identify victims and share this information with others, the scale and extent of their offending etc. The research is also including interviews with victims of modern day slavery, who have been forced to carry out labour during doorstep crime offending. (Section 14)
9. The project team at North Yorkshire Trading Standards have now completed their project for the National Tasking Group, examining the current landscape of doorstep crime. The national survey has shown **91%** of local authorities believe the project has added value.
10. The conclusions reached by the project team are that there needs to be a regional or national response to doorstep crime, to address the impact of the current financial situation facing local authorities and the accompanying lack of uniformity in doorstep crime enforcement and varying levels of service delivery to victims. (Section 19)
11. A number of recommendations are made by the project team to improve current efforts to tackle doorstep crime and engagement with partners. (Section 20)

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7. **Background and Introduction:**
	1. Following the initial six-month project conducted by North Yorkshire Trading Standards Doorstep Crime Project team on behalf of the National Tasking Group (NTG) between October 2013 and March 2014, the team was further tasked by the NTG in May 2014 to deliver an additional twelve month project.
	2. The second phase of the project was to take forward some of the recommendations identified in the initial project report submitted in March 2014.
	3. For 2014/15, Doorstep Crime (DSC) remained a priority identified in the control strategy of the National Trading Standards Board (NTS) and was also a priority identified by the Consumer Protection Partnership (CPP), with a working group of all relevant partners to be set up from April 2014.
	4. A number of funding options were proposed to the NTG by the project team in March 2014. These included: a continuation of the existing project team to work with the third sector and other partners, produce good practice guidance materials for the profession, to conduct some further analysis of the existing intelligence held, and to introduce improvements in data and intelligence recording by the profession; a fully operational development and investigations team to operate throughout England and Wales investigating DSC offending and to develop partnership working; and two smaller alternatives to a fully operational team with varying resource levels.
	5. The NTG decided in April 2014 to pursue the first of these options, namely a continuation of the existing project team, consisting of three full-time staff and some limited part-time support. This brought with it the limitations identified by the project team in their initial report in March 2014, namely: an insufficient resource to produce significant improvements in the uniformity of service provision to DSC victims nationally, most notably in relation to enforcement and intelligence development; and the inability to produce any significant reduction in crimes taking place, including no increase in the number of prosecutions being brought by Local Authorities (LAs) and the identification of Organised Crime Groups (OCGs).
	6. This report should therefore be considered in the context of the limitations identified by the project team, prior to the commencement of the second phase of the project in May 2014.
	7. It should also be considered in the context of the unprecedented financial situation facing all LAs.
8. **The 2014/15 National Tasking Group Doorstep Crime Project Team Action Plan:**
	1. The project team formulated an action plan in May 2014, in consultation with the NTS programme office and the NTG.
	2. A number of key work areas were identified as follows:
9. To develop data recording by trading standards in relation to DSC and an annual reporting requirement to establish levels of DSC nationally and the response by LAs.
10. To work with the CPP DSC working group, including in relation to National Consumer Week in November 2014.
11. To engage with relevant government departments to raise the profile and awareness of DSC and to explore funding opportunities and joint-working opportunities.
12. To continue the implementation of the Victim Impact Survey, including analysis of the results.
13. To undertake intelligence development work with the National Trading Standards Intelligence Team (NTSIT), specifically in relation to OCGs, and including National Fraud Intelligence Bureau (NFIB) DSC data and National Crime Agency (NCA) scored OCGs.
14. To undertake a three-month trial in the Yorkshire & Humber region in relation to DSC reports, intelligence development and enforcement.
15. To work with the third sector to raise awareness and reporting of DSC and identify joint-working and safeguarding opportunities. To include holding a stakeholder’s conference in relation to DSC, in advance of National Consumer Week.
16. To work with the financial sector to improve their response to safeguarding vulnerable consumers and enforcement opportunities.
17. To examine the existing police response to DSC and victims, including by carrying out a survey of forces in relation to their response.
18. To explore the cost-savings relating to effective safeguarding of DSC victims.
19. To commission academic research by a criminologist to include interviews with offenders, interviews with released victims of slavery / enforced labour, interviews with repeat victims, and situational analysis to identify prevention opportunities.
20. To deliver training to the Scambuster teams and undertake peer review of their DSC investigations.
21. To issue best practice guidance to the profession and complete the production of a training DVD.
22. To provide support for householder surveys by LAs / regions.
	1. Unfortunately, due to some staffing issues experienced by the project team between October 2014 and February 2015, some of the above targets could not be met.
	2. However, the remainder of this report summarises the achievements of the project team and makes recommendations for future work to be sponsored by the NTG and NTS to tackle doorstep crime and improve the trading standards response.
23. **Performance against the baseline established in 2013/14:**
	1. Following the success of the national trading standards DSC survey conducted in Winter 2013/14, which achieved a **95%** response rate, a further survey was issued by the project team to the profession in February 2015.
	2. The purpose of this second survey was to measure levels of DSC for the full year of 2013/14 (the previous survey had only looked at first six months), and the first ten months of 2014/15 (up to 31/1/15).
	3. The initial project report from March 2014 recommended that a national reporting requirement be introduced for the profession, to inform the NTG, NTS and the profession of the current landscape of DSC and any changes since the previous survey.
	4. The 2014/15 survey has examined in detail levels of DSC, priorities and resources allocated by LAs, data recording by LAs, tasking and referrals, awareness of OCGs, partnership working, performance targets, and the value, if any, added by the national DSC project.
	5. It should be noted from the outset that the response levels to the survey were lower than in 2013/14. The project team has had to chase responses from LAs to ensure the response levels were sufficient to allow comparisons to be made with the 2013/14 data. A final response level of **77%** was achieved, with one hundred and twenty-eight LAs responding. Interestingly, some LAs commented that they did not have the resource to complete the survey, due to budget cuts.
	6. The response rate by regions was as follows:

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| **CENTSA** | **100%** |
| **NW** | **95%** |
| **NE** | **92%** |
| **Y & H** | **91%** |
| **SW** | **86%** |
| **SE** | **83%** |
| **EE** | **82%** |
| **WHOTS** | **82%** |
| **E MIDS** | **62.5%** |
| **LOTSA** | **36%** |

* 1. **Number of incidents:**
		1. In 2013/14, the survey established that around 17,000 reports of DSC were made to LAs each year.
		2. In this year’s survey **32%** of LAs stated they are not currently monitoring the number of incidents reported to them (34% in 2013/14).
		3. **30%** of LAs have also stated they are unable to provide any data regarding the number of DSC incidents reported to them (32% in 2013/14).
		4. In addition, for those LAs who are monitoring the levels of incidents reported and provide data regarding the numbers, **94%** of LAs are unable to differentiate between crimes, crimes prevented by intervention, and simple intelligence reports, for example sightings of offenders or cold calls in zones (also 94% in 2013/14).
		5. These statistics are quite worrying as it indicates that a third of LAs are unaware of the levels of DSC in their areas and that existing databases remain ineffective as a means to monitor the DSC landscape and any changes year on year.
		6. Those LAs who have been able to provide figures regarding the number of incidents in their area identified **7,914** reports to 78 LAs in 2013/14, and **7,477** reports to 86 LAs in the first ten months of 2014/15 (suggesting a total of **8,972** for the year end (7,477/10 x 12)).
		7. For 2013/14 the figures show an average number of reports per LA of **101.5** (7,914/78). So for 166 LAs the total would be **16,849** reports (101.5 x 166).
		8. For 2014/15, the figures show an average number of reports per LA of **104** (8,972/86). So for 166 LAs the total would be **17,264** reports (104 x 166). This suggests there has been only a very marginal increase in the number of reports to trading standards between 2013/14 and 2014/15.
		9. Reporting levels of DSC incidents are known to be very low, as outlined in the report to NTG in March 2014. This is for a number of reasons, each explored in more detail in the 2014 report. For the purposes of that report, estimated reporting levels of 10-20% were used, following discussions with the profession in national meetings held in the first six months of the project.
		10. The results of this year’s survey show that **88%** of LAs still have no data regarding reporting levels in their areas (compared to 89% in 2013/14).
		11. Despite the absence of such figures, LAs were asked to estimate the reporting levels for incidents within their LA area. **38%** of LAs estimated that reporting levels in their areas were at 0-5%. **44%** estimated their reporting levels were at 5-10%. Just **15%** of LAs estimating their reporting levels were between 10-20%. Only **3%** estimated at over 20%.
		12. The most concerning issue about such reporting levels is the number of victims who still do not tell anyone about their DSC experience, resulting in a failure to detect and prosecute the offenders and to ensure the victims are adequately safeguarded. This should raise serious concerns for the profession in relation to the 90%+ of victims who never report. It should also be taken into account when LAs, the NTG and NTS are considering their response and resource allocation to increasing reporting and prevention work.
		13. Based on the estimated levels of reporting above, this suggests the true levels of incidents that could have been reported to trading standards in 2014/15 are as follows:
* If **10%** of incidents are reported to trading standards, the true number of incidents that could be reported is **172,640**.

(17,264/10 x 100)

* If **5%** of incidents are reported to trading standards, the true number of incidents that could be reported is **345,280**.

(17,264/5 x 100)

* If **2.5%** of incidents are reported to trading standards, the true number of incidents that could be reported is **690,560**.

(17,264/2.5 x 100)

* If **1%** of incidents are reported to trading standards, the true number of incidents that could be reported is **1,726,400**.
	+ 1. These figures do not take into account those incidents that are reported or could be reported to the police or Action Fraud.
	1. **Priorities**
		1. LAs were also asked what priorities they allocated to the areas of enforcement, intelligence and prevention.
		2. The results show a **23% reduction** in the number of LAs stating they give a high priority to DSC enforcement, from 80% in 2013/14 to **62%**.
		3. They also show a **29% reduction** in the number of LAs stating they give a high priority to DSC intelligence, from 63% in 2013/14 to **45%**, and a **57% reduction** in the number of LAs stating they give high priority to DSC prevention, from 58% in 2013/14 to **25%**.

**LA’s giving high priority to enforcement, intelligence and prevention**

* + 1. However, the results also showed increases in the number of LAs stating they give a medium priority to DSC enforcement, intelligence and prevention.
		2. In relation to enforcement, there was an **88% increase**, from 17% in 2013/14 to **32%**. For intelligence, there was a **48% increase**, from 33% in 2013/14 to **49%**. For prevention, there was a **64% increase**, from 28% in 2013/14 to **46%**.

**LA’s giving medium priority to enforcement, intelligence and prevention**

* + 1. The results also showed increases in the number of LAs stating they give low priority to enforcement and prevention. In relation to enforcement there was a **100% increase** from 3% of LAs in 2013/14 to **6%**. For prevention, there was a **114% increase** from 14% in 2013/14 to **30%**. There was a minimal increase in the number of LAs saying they give a low priority to DSC intelligence from 5% in 2013/14 to **7%**.

**LAs giving low priority to enforcement, intelligence and prevention**

* + 1. LAs were then asked to indicate what other areas of work they were giving priority to, over DSC. The following table shows the results:
		2. LAs were also asked what priority they would like to allocate to DSC, if resources allowed. Over 90% of LAs stated they would allocate high priority to all three areas. **96%** of LAsstated they would allocate high priority to enforcement, **95%** to intelligence and **93%** to prevention.
		3. There is, therefore, widespread recognition from LAs that DSC is an area of work that should be receiving a high priority, but the ability to deliver high levels of service are severely limited by resources and competing priorities, including those which are income-generating.
	1. **Resource allocation:**
		1. LAs were asked to outline what resources they are currently able to allocate to tackling DSC. **60%** of LAs stated they are allocating **10% or less** of their budget to tackling DSC (a 13% increase from 53% in 2013/14). **29%** of LAs stated they are allocating 11-20% of their budget (a 19% decrease from 36% in 2013/14). Only **12%** of LAs stated they are allocating 21% or more of their budget to tackling DSC (11% in 2014).

**Percentage of overall LA budget allocated to tackling DSC:**

* + 1. In terms of what this equates to in Full Time Equivalent (FTE) posts within each service, **60%** of LAs stated they allocate **1 or less FTEs** to tackling DSC**. 32%** of LAs stated they allocate 2-4 FTEs. Only **8%** of LAs stated they are allocating5 or more FTEs to tackling DSC.
		2. The ability of LAs to effectively deal with DSC enforcement, intelligence and prevention is extremely limited for those allocating 10% or less of their budget and 1 or less FTEs. It is very concerning that this applies to 60**%** of LAs.
		3. The unprecedented financial constraints facing LAs has created, and is maintaining, the lack of uniformity across the country and also the postcode lottery for victims and potential victims of DSC.

**3.9a The project team recommends that recognition is given to the fact that the financial constraints facing LAs has created, and is maintaining, a lack of uniformity in enforcement and a postcode lottery for victims of DSC, and that this is acknowledged and considered further by the NTG and NTS, in conjunction with the comments in 14.3.6.**

**3.9b The project team specifically recommends that the NTG and NTS give full consideration to the option of funding a national team or regional teams to investigate DSC offending and carry out enforcement and intelligence development work, and that such a resource needs to be over and above the resource currently provided by the Scambuster teams.**

* 1. **Amount of financial detriment to consumers from DSC:**
		1. Attempts were made by the project team to establish both the total amount of financial detriment to consumers from DSC and the average detriment per consumer in March 2014.
		2. LAs were asked in the 2015 survey about their ability to measure the levels of financial detriment. **75%** stated they were unable to measure it.
		3. For those LAs who stated they could measure it, the amounts varied from £500 to £30,000 per consumer. Removing those very high amounts identified by LAs who have identified serious repeat victims who have lost tens of thousands or hundreds of thousands of pounds to DSC, the average detriment from those **26%** of LAs who have attempted to measure it is **£1,160** **per victim**. Including the high detriment figures, which more accurately reflects the reality of DSC investigations, the average detriment figure is **£1,406**. The average of these two figures is **£1,280**.
		4. The figure of £1,280 is fairly close to the figure of £1,000 identified by the project team in the first phase of the project and their report in March 2014. However, it must be recognised that there are some serious limitations to correctly establishing the true amount of detriment.
		5. Firstly, the way in which data is currently recorded by LAs. If the Citizens Advice Consumer Service (CACS) takes a call from a family member of a victim who reports that their relative has paid £2,000 for roofing work, the detriment figure recorded by CACS is £2,000. However, if the LA then conducts an investigation and establishes that the family member is in fact a repeat victim who has paid over £50,000 to offenders it is unlikely that they will alter their database to change the detriment figure to £50,000. In addition, if a financial investigation is then conducted and multiple victims are identified across the country, the LA is unlikely to enter each individual victim onto their database and include their individual detriment figures, particularly for victims outside of their LA boundaries. Further, the only data available nationally, without having to ask each LA individually, is the CACS data.
		6. Secondly, the low reporting levels for DSC means the vast majority of victims never report to trading standards, the police or Action Fraud. In many cases, the worst repeat victims are the least likely to report, unless the offending is identified by a third party. This means that a vast amount of financial detriment remains unreported / unidentified.
		7. These issues are further compounded by the lack of ability to measure the amount of reports and the associated financial detriment to victims made to other agencies, most notably the police.
		8. Examination of sample data from the National Fraud Intelligence Bureau (NFIB) suggests the average detriment per victim for reports to Action Fraud are between £2,500 and £4,500, giving an average of **£3,500**.
		9. Based on the figures provided in paragraph 3.7.8 above, the total financial detriment resulting from DSC can be estimated as at least **£22.1m** (£1,280 x 17,264 incidents).
		10. If calculations are then made to take into account the low reporting levels identified in paragraph 3.7.11 above, the following levels of financial detriment can be estimated:
* If reporting levels are 10%, the resulting financial detriment can be estimated at **£221m** (17,264/10 x 100 x £1280).
* If reporting levels are 5%, the resulting financial detriment can be estimated at **£442m** (17,264/5 x 100 x £1,280).
* If reporting levels are 2.5%, the resulting financial detriment can be estimated at **£884m** (17,264/2.5 x 100 x £1,280).
* If reporting levels are 1%, the resulting financial detriment can be estimated at **£2.21bn** (17,264/1 x 100 x £1,280).
	+ 1. So it can now be estimated that the total financial detriment to consumers from DSC is **between £22.1m and £2.21bn**.
		2. Using the average detriment figures from the NFIB reports, the estimates would be between **£60.4m and £6.04bn**.
	1. **Prosecutions:**
		1. The levels of resource allocated to tackling DSC are reflected in the national picture for numbers of prosecutions undertaken by LAs, which remain disappointingly low.
		2. The survey required LAs to indicate who prosecutes their DSC cases. **21%** stated that they prosecute in-house within their service. **83%** stated their cases are prosecuted by Council legal services. Only **7%** of LAs have obtained access to the CPS for prosecutions as a result of joint-working with police forces. In addition, only two LAs have been able to establish an MOU with the CPS regarding the prosecution of their cases.
		3. In the 2013/14 survey, **58%** of LAs said they did not bring any prosecutions (averaged over the three years of 2011/12 – 2013/14), were unable to provide any figures in relation to prosecutions or completely skipped the question. Just **twenty-two LAs** had taken two or more prosecutions (**13%** of LAs). The average number of prosecutions per LA per year in England and Wales was just under one (**0.96**).
		4. In this year’s survey **55%** of LAs said they did not bring any prosecutions, were unable to provide any figures in relation to prosecutions or skipped the question. Just **thirty-two** LAs had taken two or more prosecutions in 2013/14(**25%** of responding LAs, **19%** of all LAs). **Twenty-five** LAs had taken two or more prosecutions in 2014/15 (**20%** of responding LAs, **15%** of all LAs).
		5. The average number of prosecutions per LA in England and Wales has remained at **1 prosecution per LA per year** (1.07 in 2013/14 and 0.95 in 2014/15).
		6. The ability to measure the number of prosecutions taking place each year is hindered by the Sanctions Information Database and the inability to pull off just those prosecutions relating to DSC offenders.
		7. This year’s survey asked LAs an additional question regarding the offence types used in prosecutions of DSC offenders. The results are illustrated in the following table:
		8. It is really encouraging to see that **73%** of LAs prosecuting have used section 2 Fraud Act 2006 offences. However, the results suggest there is much room for improvement in relation to use of fraudulent trading offences, conspiracy to defraud and money laundering offences, with most authorities using offences under the Consumer Protection from Unfair Trading Regulations 2008.
		9. LAs have also been asked about the actions they take when dealing with DSC offenders. **71%** stated they have DSC offenders arrested. Of those who do secure arrests, only **34%** charge offenders in custody and **just 17%** utilise the opportunities to remand offenders in custody prior to trial. As a result, the advantages of putting in place bail conditions to reduce the chances of further offending on bail, restrict contact with victims and prevent cold-calling are lost, as are the opportunities to identify further offending on bail and the advantages presented by remanding in custody, prior to sentence, and achieving increased sentences for offenders.
		10. Most concerning in relation to the prosecution figures is the overall lack of prosecutions taking place and the fact that the vast majority are being undertaken by between **15-25%** **of the profession**. This contributes to the current lack of uniformity and the ability of offenders to cross LA and force borders to avoid detection and prosecution. It also reflects the postcode lottery that exists for victims, including in seeing offenders brought to justice for the offending against them and for compensation to be obtained on their behalf through confiscation under the Proceeds of Crime Act 2002.
	2. **Areas of work undertaken:**
		1. The following table shows the survey results for the areas of work currently undertaken by LAs in relation to DSC:

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| **ACTIVITY** | **2013/14** | **2014/15** |
| **Criminal investigations**  | **94%** | **91%** |
| **Rapid responses to incidents**  | **87%** | **86%** |
| **Use of traditional media (local newspapers etc)**  | **81%** | **84%** |
| **Window/door stickers for consumers to display**  | **85%** | **84%** |
| **Prosecutions**  | **86%** | **80%** |
| **Proactive enforcement work (eg Op Rogue Trader)**  | **88%** | **82%** |
| **Safeguarding of victims (including safeguarding referrals to other agencies)**  | **66%** | **80%** |
| **Monitoring of doorstep crime incidents**  |  | **72%** |
| **Training to partner agencies**  | **68%** | **59%** |
| **Educational talks to public**  | **75%** | **64%** |
| **Trusted trader schemes**  |  | **61%** |
| **Follow up/reassurance visits to victims after incident**  | **64%** | **56%** |
| **Training to voluntary organisations**  | **68%** | **48%** |
| **Financial investigations (to assist criminal cases)**  | **49%** | **52%** |
| **No Cold Calling Zones**  | **60%** | **50%** |
| **Proceeds of Crime Act confiscation cases**  | **46%** | **46%** |
| **Twitter**  | **26%** | **42%** |
| **Articles in local publications**  |  | **38%** |
| **Proceeds of Crime Act cash seizures**  | **32%** | **38%** |
| **Facebook**  | **21%** | **38%** |
| **Money laundering investigations**  |  | **31%** |
| **A webpage on doorstep crime on your authority's corporate website**  | **37%** | **35%** |
| **Community messaging (eg Ringmaster)**  | **35%** | **34%** |
| **Population profiling / mapping to identify high risk areas for prioritisation of resources**  |  | **32%** |
| **Training to financial sector**  |  | **28%** |
| **Multi-agency work (eg: MASH, seconded police officers)**  |  | **27%** |
| **Dedicated rapid response telephone number**  | **21%** | **23%** |
| **Provision of posters to raise awareness**  |  | **23%** |
| **Cold Calling Control Zones**  | **15%** | **20%** |
| **Local financial sector protocols**  | **38%** | **19%** |
| **Use of community champions / volunteers**  |  | **16%** |
| **Use of Superstickers**  |  | **14%** |
| **Adverts/publicity material in libraries**  | **19%** | **17%** |
| **Out of hours response to incidents/victims**  | **11%** | **10%** |
| **Proactive work with the traveller community**  |  | **9%** |
| **Adverts on plasma screens in doctors surgeries, post offices or hospital waiting areas**  | **3%** | **4%** |
| **A dedicated doorstep crime website**  | **2%** | **2%** |
| **Adverts on public transport**  | **3%** | **2%** |

* + 1. The most significant increases can be seen for safeguarding of victims, use of social media and Proceeds of Crime Act use.
		2. Reductions can be seen in relation to many of the prevention strands of work, which mirrors the responses to the questions about resource allocation and priorities.
		3. There is still an unexplained disparity between the number of LAs stating they are investigating criminal offences (**91%**) and the number prosecuting offenders (**80%**).
		4. **50%** of LAs indicated that they do have a minimum standard of response when receiving a DSC report (compared to 59% in 2013/14).
	1. **Measuring performance:**
		1. The project team’s report to the NTG in March 2014 stressed the importance of LAs being able to demonstrate their effectiveness and performance, to assist them to maintain resources to continue to tackle DSC and also to argue the case for increased resources.
		2. It is therefore worrying that there has been a reduction in the number of LAs who have performance targets in relation to DSC. The percentage of LAs has fallen to **28%** from 44% in 2013/14.
		3. Suggestions were made by the project team in their report, at the national conference in April 2014 and at regional meetings with DSC working groups about three key objectives for tackling DSC. These were to reduce DSC, namely the number of crimes / incidents taking place, to increase reporting and raise awareness, and to safeguard victims. LAs were therefore asked whether they had any specific targets in relation to those three areas. **94%** had no targets around reducing crime, **89%** had no targets around increasing reporting and awareness, and **88%** had no targets around safeguarding of victims.
		4. The project team are concerned that the profession and individual LAs remain in a position where they are unable to demonstrate the effectiveness and importance of their actions in relation to tackling DSC.
		5. The advantages of having performance targets in relation to crime reduction, increased reporting and safeguarding of victims are to enable LAs to demonstrate the effectiveness of their efforts to tackle DSC. If a LA can show that their enforcement, disruption and prosecution efforts have led to an overall reduction in the number of crimes taking place within their area, this evidence can be used to help argue for maintenance of existing resource levels. The same can be said for being able to produce evidence to show that resources allocated to talks to the voluntary sector, partner agencies and financial sector and other prevention initiatives such as setting up No Cold Call Zones has led to increased reporting of DSC incidents and the identification of vulnerable victims who require safeguarding interventions. Being able to then also demonstrate that safeguarding interventions and efforts to reduce the loneliness and isolation of victims have improved their quality of life and ability to remain living independently in their own homes safely also fits with the Care Act agenda and helps to deliver the outcomes of adult services. Good practice guidance has been issued by the project team in relation to the area of performance measures.

**3.13a The project team recommends that the NTG continues with the annual national survey as a means of measuring performance for tackling doorstep crime.**

1. **Data recording by trading standards:**
	1. **Data recording:**
		1. The following table shows the survey results for data recording by LAs in relation to DSC incidents:
		2. There has been little improvement in relation to the amount and quality of the data collected by individual LAs to enable them to accurately reflect issues such as the scale of DSC within their areas, their typical victim typology, the number of referrals being made by banks and police forces, and the number of victims being taken to banks and other financial institutions.
		3. What the results do indicate is that there is still a lack of uniformity within the profession regarding what data is recorded and, more importantly, is reportable on. The consequences of this are that the profession and individual LAs are in a weak position to argue for continued and additional resources, particularly at a national level. In addition, it impedes the ability of the profession as a whole to demonstrate the scale of the problem and the specific issues associated with DSC and the victims involved.
	2. Good practice guidance is being issued regarding simple measures that can be put in place within LAs to enable them to report on key data such as their local victim typology, the scale of the DSC problem locally, identifying trends in offending, for example geographical areas or spikes in offending at certain times, interaction with the financial sector and the police etc.
	3. Recording of such data will help the profession and individual LAs understand the issues they face in relation to DSC and what resources may be needed to effectively tackle DSC. It will also assist in demonstrating the performance of LAs in crime reduction, increasing reporting and safeguarding of victims and provide evidence to support efforts to improve engagement with the financial sector and the response of police forces to this crime type.
	4. The results of the Victim Impact Survey, outlined in section 9. of this report, also assist LAs to demonstrate many of the issues surrounding victims of DSC and a victim typology.
	5. Representations have been made by the project team to the CACS regarding coding of DSC complaints. These include removing the current classifications of “Doorstep Invited” and “Doorstep Uninvited”, and the introduction of one “Doorstep Crime” code, using the definition of DSC set by the project team in their initial report in 2014. This would enable more accurate monitoring of DSC complaints made to CACS (although it would still require figures from individual LAs, as the majority of reports of DSC come from sources other than CACS). At present, the CACS data with the existing coding contains a large percentage of reports which are not DSC as defined by the project team. For example, complaints about local established and legitimate builders who have carried out work at consumer’s homes and not realised they should have issued a cancellation notice.
2. **The Consumer Protection Partnership:**
	1. The CPP Priorities Report 2013/14, issued in November 2013, identified DSC as a Markets and Practices priority and stated that a strategy to address DSC would be developed from April 2014.
	2. As a result, the DSC project team included within their action plan a target relating to joint-working with the CPP and membership of their working group.
	3. The team have attended all the working group meetings, providing a summary of the findings of the March 2014 report as a starting point in relation to assessing the scale and nature of the problem. The team also undertook joint-working with partners in relation to National Consumer Week in November 2014.
	4. The strategy agreed by the working group focussed on five key priorities as follows:
3. Engagement with the third sector.
4. Data development.
5. Engagement with the financial sector.
6. Delivering a successful National Consumer Week.
7. Enforcement.
	1. Many of the detailed actions identified within the key priorities above already formed part of the action plan of the project team and also the Convention of Scottish Local Authorities (COSLA). In addition, National Consumer Week was run by the Trading Standards Institute (TSI) and widely supported by partners, including Citizen’s Advice.
	2. The final report on the outcomes of National Consumer Week are still awaited from TSI and Citizen’s Advice and will be available following the final CPP DSC working group in April 2015.
	3. Members of the CPP DSC working group requested the project team to provide sanitised case studies that could be made available to them for the purposes of raising awareness, delivering training sessions for staff and to use for press purposes. Examples are being prepared by the project team as part of the good practice guidance.
8. **Government engagement:**
	1. **The Department for Business, Innovations and Skills (BIS):**
		1. The project team has directly engaged BIS as a result of membership of the CPP DSC working group.
		2. The CPP Priorities Report 2015 published in January 2015 highlights the current position in relation to DSC:

<https://www.gov.uk/government/publications/consumer-protection-partnership-priorities-2014-to-2015>

* + 1. National Consumer Week was also supported by the Minister for Consumer Affairs.

**6.1a The project team recommends that the findings of the national survey and of this report are shared with the Minister for Consumer Affairs, after the May 2015 election, to highlight the current restrictions on LAs to effectively deal with tackling DSC, most notably in relation to enforcement and prosecutions.**

* 1. **Home Office:**
		1. **The Strategic Centre for Organised Crime**

The project team have engaged directly with the Strategic Centre for Organised Crime, to discuss the involvement of OCGs in DSC offending and to increase awareness and understanding regarding the scale of the problem and the current response by all agencies to tackling DSC.

* + 1. The Government’s Serious and Organised Crime Strategy (<https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/248645/Serious_and_Organised_Crime_Strategy.pdf> ) contains four key themes for dealing with organised crime groups, which can be applied directly to tackling DSC:
* **PURSUE:** Prosecuting and disrupting serious and organised crime
* **PREVENT:** Preventing people from engaging in serious and organised crime
* **PROTECT:** Increasing protection against serious and organised crime
* **PREPARE:** Reducing the impact of serious and organised crime
	+ 1. Each of the above themes has a specific project team allocated, to improve efforts by all agencies to undertake work in relation to that theme for OCGs they encounter.
		2. The Protect team at the Strategic Centre have expressed an interest in the work being undertaken by the project team, particularly the Victim Impact Survey and efforts to protect vulnerable adults from DSC and other forms of financial abuse. They attended the Stakeholder’s conference in October 2014 and have also been involved in other initiatives attended by the project team including the Financial Conduct Authority’s work on vulnerable consumers (see 12.10 below) and the British Standards Institution’s work on a Code of Practice for dealing with vulnerable adults (see 12.12 below).
		3. **The Police response and crime recording**

As a result of the survey conducted with police forces by the project team (see Section 13. below) further work could now be progressed with the Home Office in relation to the lack of uniformity in service delivery to vulnerable victims of DSC and to offending, as well as the lack of a crime recording code for DSC.

**6.2a The project team recommends that the findings of this project report and the survey of police forces are shared with the Home Office minister with responsibility for policing, after the May 2015 election.**

* + 1. **College of Policing**

The results of the Police survey, outlined in Section 13. below, suggest that further work needs to be completed to ensure a basic level of knowledge and understanding of DSC for all relevant police staff.

**6.2b The project team recommends that contact be made with the College of Policing, to discuss the possibility of providing some content for training materials. This could be solely in relation to DSC, or could also be provided in relation to other forms of financial abuse of vulnerable adults, for example scam mail. It could fit with any existing safeguarding training that is provided to officers.**

* + 1. **Modern Day Slavery**

As a result of the intelligence linking DSC OCGs to slavery and forced labour issues the project team recommends engagement with the Modern Day Slavery team at the Home Office. They were involved in the initial discussions which took place with the Strategic Centre for Organised Crime at the Home Office in September 2014. However, the findings of the academic research in relation to slavery / forced labour (see section 14.4 below) will provide evidence of the nature and extent of the problem.

**6.2c The project team recommends that the findings of this report by shared with the Modern Day Slavery team at the Home Office and that this work should commence following the completion of interviews with victims of slavery / forced labour and the publication of the associated academic research report.**

* 1. **Department of Health:**
		1. The project team met with the Deputy Director for Prevention, Housing and Dementia in the Social Care, Local Government and Care Partnerships Directorate of the Department of Health in February 2015.
		2. The Directorate has the lead for work-streams in relation to Loneliness & Isolation and also Dementia.
		3. A number of areas of work were discussed including the possibility of delivering training to the health sector and to GPs in relation to DSC and safeguarding vulnerable victims. A request has since been received from Health Education England for the project team to engage with their Expert Advisory Group. Due to the timing of the meeting (30th March) it is not possible for the project team to attend and present.
		4. However, the opportunity has been passed to the Programme Office with the recommendation that either they attend to discuss the possibility of training delivery, or the opportunity is made available to the National Trading Standards Scams Team (NTSST) to widen the discussions to other frauds and scams and financial abuse of vulnerable adults.

**6.3a The project team recommends that the NTSST engages with Health Education England to create training materials for delivery to the health sector regarding DSC, scams and the financial abuse of vulnerable adults.**

* + 1. Discussions also took place in relation to the possibility of training delivery to GPs and contacts have now been obtained at the Royal College of GPs.
		2. Contacts were also obtained for the Department of Work and Pensions Later Life Engagement Team and the Health and Policing Lead in the Safeguarding and Vulnerable People Unit at the Home Office.

**6.3b The project team recommends that contact is made with the Department of Work and Pensions Later Life Engagement Team and the Health and Policing Lead in the Safeguarding and Vulnerable Adults Unit at the Home Office to explore the options for joint-working.**

* 1. **Minister for Older People:**
		1. In January 2015 the project team met with Paul Burstow MP, to discuss the campaign for an Older Person’s Minister at Cabinet level and an Older People’s Commissioner, to ensure older people are better represented in Government and in policies.
		2. The findings of the project were shared by the project team and case studies of DSC victims were also provided.

**6.4a The project team recommends that contact is made with the appropriate Minister of the new government, following the May 2015 election, to present the findings of this report and to make representations regarding the nature and extent of DSC and other financial abuse of vulnerable adults, and the need to co-ordinate the work of various departments in protecting vulnerable adults from financial abuse. This could include a recommendation that a Task Force or Strategic Board of relevant departments and agencies be established, to look at co-ordinating efforts to tackle financial abuse of vulnerable adults.**

**6.4b The project team recommends that the NTG / NTS petition the Government and provide evidence to support arguments to establish a Minister for Older People and an Older Person’s Commissioner, following the May 2015 election.**

1. **The Citizen’s Advice Consumer Service (CACS) and database:**
	1. In October 2014 the project team delivered twenty-two training sessions to the CACS advice line staff based in Cwmbran, Weston-Super-Mare and Barrow-in-Furness. COSLA agreed to deliver the training to the staff in Stornaway and CACS staff agreed to deliver the training to their Maidstone staff, due to some internal issues.
	2. The purpose of the training was to increase their awareness about the scale and seriousness of DSC, to ensure they were able to identify it and correctly classify it from reports made to them, and to sign-post cases and reporters to the relevant agencies, including primarily trading standards. Advice was given regarding specific enquiries to be made when receiving reports, for example, whether the offender/s were expected to return, whether any safeguarding issues were identified, whether any forensic opportunities exist, for example whether paperwork had been left or CCTV evidence could be secured, and whether any intervention opportunities exist, for example to prevent payment being made or to secure arrests.
	3. The training also provided an opportunity to discuss issues experienced by the staff including when attempting to make urgent referrals to LAs regarding DSC incidents and vulnerable consumers, the lack of engagement experienced by the staff due to the lack of trading standards training they receive, and the lack of feedback from LAs regarding outcomes of interventions and investigations, which also contributes to the continued engagement and motivation of the staff.
	4. The following feedback was received in relation to the training:
2. How would people have rated their knowledge of DSC prior to the training (scale of 1 – 10, with full knowledge being a 10 and 1 being no knowledge)?
3. Did they find the sessions useful for their day job?

***Yes, very – good insight and knowledge.***

1. Did they find the sessions interesting?

***Yes. Extremely useful not only for DSC but also it gave the team an insight to what trading standards do and the relationship TSS have with the police.***

1. How would they rate their knowledge of DSC after the training (scale of 1-10 as above)?

***8-9***

1. How has the training helped since they received it?

***More aware of the full extent of crime that occurs at the doorstep, not just failure to give paperwork and overcharging.***

1. Would they like the opportunity to have similar sessions from other NTSB project teams, eg: e-crime and scam?

***Yes, very much so.***

1. Any other comments?
* ***I would like to see these sessions run more frequently.***
* ***It would be also nice to receive a report from TSS, say every 6 months, with information on DSC cases we have referred which have resulted in the trader being arrested / the consumer being refunded.***
* ***Great insight and in-depth information about past cases and ways in that CACH can help try and offer as much information as possible to TSS.***
* ***The meeting was extremely helpful to advisers as it offered a lot of information in regards to rogue, itinerant and doorstep traders.***
* ***Good use of material.***
* ***Good level of details both from TSS view as well as consumer’s / victim’s.***
* ***The use of case studies made the realisation of how the T works and how the victims can be affected.***
* ***Good use of Q&A at the end of sessions and due to the group size being small this gave the advisers the opportunity to chat about protocols – referrals and previous cases.***
* ***The sessions were very well organised. Her Powerpoint presentation contained enough detail to keep the audience engaged visually but the core value of the presentation was the insight Ruth could share from her own personal experiences as an officer. She knew her subject matter in great depth and was happy to answer any questions.***
* ***She had prepared poignant case studies to relay and these helped the advisors relate to the impact doorstep crime can have on a vulnerable individuals and their families. These case studies also helped advisors understand what can happen with the intelligence they collect and the part they play in the bigger picture.***
* ***The sessions also helped to restore faith in the Trading Standards Service. Many advisors had experienced attempting to urgently refer doorstep crime cases to trading standards in the past, to find that nobody answered the call or that the officers had been dismissive of referrals. Ruth explained her current role and responsibilities within North Yorkshire Trading Standards, and also the wider role she plays in tackling doorstep crime issues throughout the Trading Standards service. By discussing her role and the role the advisors play with passion, she reinvigorated the advisors sense of value in what they do. It also helped advisors gain a fundamental understanding of the enforcement process, in a way that relates directly to the work they do.***
* ***Overall the session was informative, with the right level of detail for the information to be of value to the advisors.***

Feedback from Kate Hobson, Consumer Subject Matter expert, Citizen’s Advice:

***“I learnt a lot about doorstep crime from the sessions. In particular, the scale of doorstep crime, the concept of grooming in relation to doorstep crime, how there are three types of doorstep crime, the short time frame CCTV evidence might be available and the value of fingerprint evidence from flyers and how to preserve it.***

***The use of the word ‘offender’ rather than trader set the scene for the session and was powerful in terms of advisers recognising the harm being caused to consumers and then linking it to the contacts they handle. Combined with the examples of recent notifications to NYTS, this demonstrated to advisers how their actions might be contributing to further harm, or to consumers not receiving the assistance that might be available to them locally. Conversely, advisers complained that some TS gave negative feedback when CACS had referred doorstep issues. Ruth’s request to be made aware of such examples seemed to instil confidence in advisers present to trust their instinct. Her ability to explain why TS levels of handling doorstep crime might differ helped advisers understand what the reasons behind this are.”***

**7.4a The project team recommends that LAs review their protocols with the CACS to ensure they are able to meet the minimum response levels detailed in the protocol and to ensure they are meeting the urgent safeguarding response needs of vulnerable adults who are at risk when these are reported to them by the CACS.**

**7.4b The project team recommends that, periodically, LAs provide feedback to the CACS advice line staff regarding successful DSC prosecutions and interventions which have directly resulted from a CACS referral.**

* 1. Discussions also took place regarding the issuing of advice to LAs regarding the minimum standards for their DSC protocols with CACS and regarding the content of the current script used by CACS staff when receiving a DSC report. These are areas which will be addressed in the good practice guidance issued by the project team.
	2. The opportunity to place an article in the magazine issued to all Bureaux and Citizen’s Advice staff was also discussed. An article is currently being prepared by the project team.

**7.7 The project team recommend that further training be provided to the CACS advice line staff by the NTS E-crime Team and the NTSST.**

1. **The Care Act 2014 and safeguarding:**
	1. Safeguarding is working with adults with care and support needs to keep them safe from abuse or neglect.
	2. The Care Act introduces a new definition of an “adult at risk” to replace the previous term of “vulnerable adults”. An “adult at risk” is defined as:

i. an adult who has needs for care and support,

ii. is experiencing, or is at risk of, abuse or neglect, and

iii. as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.

*Section 42(1), Care Act 2014*

* 1. There are seven key forms of abuse and neglect, which include financial abuse. “Financial abuse” is specifically defined as including:
1. having money or other property stolen,
2. being defrauded,
3. being put under pressure in relation to money or other property, and
4. having money or other property misused.

*Section 42(3), Care Act 2014*

* 1. If a Local Authority suspects an adult is at risk, they must make, or cause to be made, whatever enquiries necessary to enable them to decide whether any action should be taken and, if so, what and by whom. *Section 42(2), Care Act 2014*
	2. Such enquiries may lead to a number of outcomes, including prosecution. In other cases a needs assessment or review of an existing care and support plan may be required. This will be dependent on the circumstances of each case and each individual.
	3. As well as defining “adults at risk” and placing the duty on local authorities to act, the Act also sets out a clear legal framework for how local authorities and others in the health and care system should work together to protect adults at risk of abuse or neglect. This is the first time there has been a legal framework for safeguarding adults, although many partners have worked together in the past.
	4. The Care Act also now requires local authorities to set up a Safeguarding Adults Board. This must include the local authority, the NHS and the police.
	5. The Board should meet regularly to discuss and act upon local safeguarding issues. They should also develop shared plans for safeguarding and how best to protect adults in vulnerable situations. The plan must be published and annual reports should be published on progress.
	6. If there have been failures in safeguarding the Board must arrange a Safeguarding Adults Review in serious cases (previously known as a Serious Case Review). This review examines the actions or inactions of the authorities involved, to determine what went wrong so that all organisations can improve.
	7. The Board can request information from any organisation or individual regarding their involvement with an individual and the information must be shared with the Board. This will include trading standards services.
	8. These changes should be taken into account by LAs when deciding on their priorities and resource allocation going forwards.
	9. **National survey results:**
		1. The most notable improvements identified by this year’s survey are in relation to safeguarding of vulnerable victims.
		2. There are significant increases in the percentage of LAs who are now making safeguarding referrals, up to **87%** of LAs from 64% in 2013/14. In light of the introduction of the Care Act 2014 and the independence strategy, this improvement is very important and encouraging.
		3. There has also been an increase in the percentage of LAs who are sharing data with health and adult services, up to **61%** from 38% in 2013/14.
		4. However, there has been a slight reduction in the number of LAs proactively trying to identify potential victims, from 43% in 2013/14 to **37%**. Again, perhaps this is an indication of the reduction in resources being allocated to prevention work.
		5. Most worryingly, there has also been a reduction in the number of LAs recording whether they have made a safeguarding alert, from 46% in 2013/14 to **39%**. Authorities need to be aware of the importance of recording their actions in relation to safeguarding, as a result of the consequences of safeguarding failings being identified and the duty to provide evidence to an Adult Safeguarding Review, should this be necessary.
	10. **Cost savings to LAs and others from effective safeguarding:**
		1. A comprehensive breakdown of the costs of social care for older adults in private care, in LA care and in hospital care, as well as for care services provided at the older adult’s home, are detailed in the Personal Social Services Research Unit report “Unit Costs of Health and Social Care 2014”, published by the University of Kent

[**http://www.pssru.ac.uk/project-pages/unit-costs/2014/**](http://www.pssru.ac.uk/project-pages/unit-costs/2014/)

* + 1. This information can be used to calculate the health and social care cost savings which result from effective safeguarding and early interventions and referrals of vulnerable adults who have been DSC victims or who have been identified during prevention activities.
		2. The sharing of case studies of DSC victims who have been effectively safeguarded following DSC incidents by trading standards should take place with colleagues in adult social services. Such case studies can help LAs demonstrate the need for their service and also, more importantly, the savings to the LA which can result by assisting to maintain the vulnerable adults ability to pay for their own care, by maintaining their own financial security, and reducing the likelihood of the vulnerable adult having care and support needs.

**8.13a The project team recommends that the NTG / NTS commission academic research to examine the cost savings to LAs which can be achieved effectively safeguarding vulnerable adults from DSC and other forms of financial abuse. Funding could be sought from the Department of Health for such research.**

* 1. **TSI Safeguarding Adults Toolkit:**
		1. TSI have recently commenced a piece of work to prepare a Safeguarding Adults Toolkit for trading standards staff. A workgroup has been established and the first meeting has been held. The project team are members of the workgroup. The intention is to produce a “one minute guide” for officers regarding safeguarding and resources to assist with safeguarding at a local level, including signposting recommendations and details of useful resources.
		2. It is planned to make the resources available to the profession at the TSI conference at Bournemouth in June / July 2015.
1. **Impact on victims and changing victim behaviour:**
	1. Between January 2014 and December 2014 a number of LAs have participated in the victim impact survey introduced by the project team. This has consisted of comprehensive surveys being conducted with newly identified victims of DSC. The national survey results show that over a third of LAs took part in the survey and, of those, over a third intend to continue using the surveys beyond March 2015.
	2. The results have been collated by the project team and have now been made available to the profession in the form of info-graphics, which can also be used in presentations, local publications etc and be shared with partners. The results have been taken from one hundred and twenty-one completed surveys with victims.
	3. The results have evidenced a number of important issues in relation to victims, their circumstances, reporting levels etc, as follows:
		1. Under a third of victims have reported via the CACS. The importance of this statistic is the illustration that many reports of DSC are made directly into LAs from other agencies and partners and that, therefore, using the CACS data as a measure of DSC levels is inadequate.
		2. The nature of the incidents can be summarised as follows:
2. Misleading or false statements/claims **63%**
3. Failure to give paperwork **58%**
4. Overcharge for goods/services **52%**
5. Poor quality goods or services **44%**
6. Unnecessary goods or services supplied **38%**
7. Failure to provide business details **36%**
8. High pressure sales **28%**
9. Aggressive behaviour/blackmail **14%**
10. Taken to bank/post office **10%**
11. Faulty goods or services **9%**
12. Distraction burglary or theft **2.5%**
	* 1. A breakdown of trade-type for the incidents is as follows:
13. Roofing/fascias/soffits **43%**
14. Gardening services **18%**
15. Block paving/driveways **10%**
16. Power washing **8%**
17. Weather-proofing/damp-proofing **8%**
18. General property repairs **8%**
19. Other **8%**
20. Double glazing **5%**
21. Tarmaccing **5%**
22. Energy saving - other **4%**
23. Furniture **3%**
24. Insulation (cavity wall/loft) **3%**
25. Security **2.5%**
26. Food products (Fish, etc) **2%**
27. Solar panels **2%**
28. Electrical goods/repairs **1%**
29. Mobility aids **1%**
	* 1. **7%** of victims surveyed were already known to LAs as a repeat victim. This raises concerns about previous efforts to target harden and safeguard the victim and indicates efforts to change the victim’s behaviour have failed.
		2. **65%** of victims were aged 75 and over, with the largest group (**over 20%**) being aged 80-84.
		3. The gender split of victims was **54%** female and **46%** male.
		4. The majority of victims lived in semi-detached houses (**33.6%**), bungalows (**31.9%**) and detached houses (**24%**). This highlights the need to focus prevention efforts on these housing types and illustrates that offenders are focussing their efforts on privately-owned housing as opposed to extra care / sheltered housing or warden controlled properties. This should assist LAs with planning prevention activities and highlights some of the differences to other crime types, for example scam mail.
		5. **57%** of victims lived alone. This highlights the importance of addressing loneliness and isolation issues for victims for prevention purposes.
		6. In relation to property adaptations, **55%** of victims already had a doorstep sticker, perhaps suggesting that some offenders may use such stickers as a means of identifying vulnerable residents. This highlights the need to ensure that stickers are given out to all residents in specific areas where vulnerable adults are identified, to prevent individual victims being specifically identified.
		7. **43%** of victims had a handrail / grab rail, ramp to their door, or a key safe for use by carers. Again this suggests that some offenders may use these items as a means of identifying vulnerable residents. Further work needs to be done with adult services regarding the siting of such items in future.
		8. **28%** of victims had a neglected garden, raising the same concerns as those above and also providing prevention opportunities through engagement with local third sector providers who may offer garden clearing services.
		9. **70%** of victims opened the door to officers attending to complete the survey. Whilst prior appointments may have been made in many cases, this highlights concerns about the ability to change behaviour of vulnerable adults and prevent them opening the door to cold-callers.
		10. With regards to the health of victims:
30. **63%** had a physical impairment, for example mobility issues.
31. **43.5%** had a long standing illness such as cancer, diabetes or heart disease.
32. **39%** had sensory impairment.
33. **13%** had a mental health condition such as depression.
34. **13%** had a cognitive impairment such as dementia.
35. **38%** of victims have falls, with **23%** of those being unable to get themselves up after having a fall.
	* 1. Only **14%** of victims had some form of formal care provision, with family members and partners providing the majority of the care. **16%** of victims stated they would like more care.
		2. Over **40%** of victims take four of more medications a day. In terms of visiting victims, these are important considerations for officers when planning visits and avoiding times when a victim may be in pain as they are due painkillers, or are drowsy from medication.
		3. **34%** of victims had experienced bereavement in the past two years. The interviews conducted with offenders by Brian Steele in 2001 highlighted that offenders do monitor obituary columns for those who have just lost their life partner.
		4. **36.5%** of victims had experience low mood or depression in the last 6 months. Much of this can be associated with loneliness and isolation.
		5. In terms of managing daily tasks:
36. **20%** of victims said they could not manage their shopping
37. **24%** could not manage cleaning their home
38. **12%** could not manage their finances
39. **22%** could not get to and from medical appointments
40. **17.5%** could not put their rubbish out
41. **30%** could not manage looking after their home and garden
42. **27%** could not manage looking after their pets, for example, walking their dog.
	* 1. All of these issues provide opportunities for intervention with partners, for example safeguarding referrals, signposting to other services such as assisted bin collections and to third sector providers.
		2. **26%** said they, or those close to them, were concerned about their memories, but only **12%** had received a formal capacity test. This is in line with national figures showing only **44%** of people with dementia receive a formal diagnosis.
		3. **41%** of victims rely on public transport (**87%** on buses, **35%** of trains, and **31.5 %** on taxis). This provides awareness raising opportunities through providers. It also provides opportunities for closer working with, and promotion of, community transport providers.
		4. In an emergency, **74%** of victims would call a family member, **48%** the police, **47.5%** a neighbour, **33%** a friend and **25%** a doctor. This highlights the need for continued awareness raising efforts amongst these groups.
		5. **17%** of victims leave their homes once a week or less, again highlighting the issues of loneliness and isolation.
43. **89%** of victims leave home to go shopping
44. **79%** go to medical appointments
45. **76%** go to a financial institution
46. **57%** go to the hairdressers
47. **39%** go to social activities such as lunch clubs, bingo, day centres etc
48. **25%** go to a place of worship
	* 1. Again, this highlights partnership working opportunities to raise awareness and increase reporting. It also highlights the importance of working with financial institutions.
		2. In relation to the hobbies undertaken by victims:
49. **73%** watch television
50. **71%** read books or magazines
51. **58%** read newspapers

This highlights again the loneliness and isolation of some victims, but also the awareness raising opportunities provided by using local media and libraries.

* + 1. **37%** of victims who did not undertake hobbies said they did not do so due to mobility issues (**72%**), health reasons (**58%**), being unable to get to them (**28%**), apathy (**26%**), or a lack of confidence (**16%**). Again this highlights opportunities for partnership working to help reduce the loneliness and isolation of victims, for example through use of community transport providers.
		2. **14%** of victims said they did not have many people they can trust completely. **10%** said they did not have enough people they felt close to. **10%** said they did not have plenty of people they could rely on when they had problems. **32%** of victims said they sometimes experience a general sense of emptiness. **39%** said they miss having people around and **9%** of victims said they felt rejected.
		3. **41%** of victims said they felt lonely, with **26%** feeling lonely every day.
		4. **16%** of victims have contact with someone outside their home once a week or less. **46%** of victims have contact with their neighbours once a week or less. **21%** have contact by telephone with family and friends once a week or less.

These indicators also highlight why some victims are vulnerable to doorstep crime and to not reporting.

* + 1. On a scale of 1 – 10, with 10 being the worst possible impact, **50%** of victims said the impact of the crime on them was between 6 and 10.
		2. In addition, **23%** of victims said the incident had affected their health. **50%** said they had suffered financial detriment. **38%** said it had reduced their confidence generally. **26%** said it had left them feeling down or depressed. **12%** said they had been left feeling afraid at home. **13%** of victims said they felt more afraid of crime as a result of the incident.

These statistics highlight the need to ensure victims are effectively safeguarded and target-hardened, both in the short-term and also in the longer term.

* + 1. **13%** of victims had not told anyone about the incident.
		2. Those that had told someone about the incident had told family (**75%**), friends (**49%**) and neighbours (**48%**).
		3. Those that had not told anyone said they felt embarrassed or ashamed (**44%**), that it was a private matter (**25%**), or they didn’t feel the need to tell anyone (**25%**).
		4. When asked how they felt about the offenders during the incident victims said:
1. They were friendly **69%**
2. They were polite **60%**
3. They were trustworthy **45%**
	* 1. The statistics for negative feelings were much lower, with only **18%** feeling the offenders were forceful, **16%** feeling suspicious, **12%** feeling they were untrustworthy and **8%** feeling the offenders were aggressive.
		2. When asked how they felt during the offending victims said:
4. Pressurised **46%**
5. Comfortable **41%**
6. In control **30%**
7. Depressed or anxious **17%**
8. Helpless **15%**
9. Confused **14%**
10. Resigned **11%**
	* 1. When asked how they felt about the offenders after the incident victims said:
11. Defrauded / Conned **60%**
12. Better able to deal with such incidents in future **56%**
13. Misled **54%**
14. Angry **51%**
15. Disappointed **35%**
16. Upset **29%**
17. Frustrated **25%**
	* 1. In terms of past and future behaviour, **56%** of victims said they had dealt with doorstep callers prior to the recent incident, **25%** had received doorstep callers in the last 6 months, and **18%** said they would deal with doorstep callers in future.
		2. These figures highlight that many victims are receiving regular doorstep callers and that, in some cases, the efforts of trading standards have not changed their future behaviour.
		3. When asked how victims would identify traders in future **71%** said they would ask for recommendations, **54%** would ask family or friends to assist, and **35%** would use some form of trader guide, for example, Trustmark.
		4. When asked who they would tell in future if they were cold called **61%** said they would tell trading standards, **54%** said friends and family, **38%** said the police and **31%** said a neighbour. Sadly, **16%** said they would tell no-one.
		5. **23%** of victims said they felt they had been the victim of a scam or fraud in the past. This highlights the need for officers attending incidents to discuss all forms of financial fraud to which the victim may be targeted, for example scam mail and investment frauds, not solely doorstep crime.
		6. **75%** of victims had some form of security measures in their home, including window locks, door chains / bars, alarm systems and spyholes. **32%** of those who did not have such measures said they would like them.
		7. **73%** of victims had a panic alarm, **37%** a monitored alarm system, **23%** a falls alarm and **20%** an emergency call system. **21%** of victims who did not have such systems said they would like them.
		8. **97%** of victims said they felt safe in their homes during the day, and **94%** felt safe at night.
		9. When asked what would help them to feel safer, most requested further security devices and wanted a greater police presence.
		10. When asked how trading standards could help them feel safer, victims said:
18. **To continue our work**
19. **More No Cold Call Zones**
20. **To effectively deal with offenders**
21. **To be present and contactable**
	* 1. When asked how trading standards had helped them deal with the incident, victims said:
22. **To be able to give a statement and hope for compensation later**
23. **Nice to have someone who was interested**
24. **Would be nice to have someone prosecuted**
25. **Nice to have someone who cares**
26. **Excellent support**
27. **Gave us more confidence**
28. **Very attentive and very reassuring**
29. **Stopped the trader taking my money**
30. **Nice to have someone to talk to**
31. **Approachable and patient**
32. **They believed me and are investigating**
33. **Been kind and caring and never blamed me**
34. **Feel more safe and secure**
	* 1. **88%** of victims said trading standards had helped them feel safer and more confident.
		2. When asked what else trading standards could do to help them the most common responses were to **help them get their money back** and to **take enforcement action against the traders**.
		3. **83%** of victims said they also receive unwanted telephone calls and **84%** of victims said they receive unwanted mail.
	1. Templates for revisits of victims have now been devised as part of the good practice guidance for the profession. This is to enable LAs to examine whether the health and wellbeing of victims has improved as a result of trading standards interventions and also to determine whether victims are feeling safer and more confident and have been able to continue to live independently. This will assist in monitoring the effectiveness and impact of safeguarding interventions with victims for the purpose of measuring performance.

**9.4a The project team recommends that LAs consider using the Victim Impact survey, including surveys conducted on revisits, as a measure of their performance in safeguarding interventions and also improving the well-being and independence of victims. This will also assist in demonstrating the cost-savings of effective safeguarding interventions.**

1. **Intelligence development & Organised Crime Group mapping:**
	1. **Intelligence / 5 x 5 x 5 submissions**
		1. In this year’s survey **41%** of LAs stated they are unable to provide any data regarding the number of 5 x 5 x 5 intelligence submissions they have made in relation to DSC (compared to 49% in 2013/14).
		2. For those LAs who could provide figures, the results showed **4,057** intelligence reports had been submitted in 2013/14. This indicates that, if all LAs had replied to the survey, the figures would have been over **5,250 (5,261).** The results also showed **4,738** intelligence reports had been submitted in the first ten months of 2014/15. This suggests the total for 2014/15 will be **5,686**. The results indicated that if all LAs had replied to the survey, the figures would be approaching **7,400** intelligence reports for the full year **(7,374).**
		3. There has therefore been a significant increase in the number of intelligence submissions regarding DSC.
		4. **76%** of LAs stated they are receiving DSC intelligence from their Regional Intelligence Analyst (RIA).
		5. In 2013/14, 15% of LAs stated they had obtained intelligence regarding forced labour / slavery issues in relation to DSC. This figure has increased to **19%** in 2014/15.
		6. **70%** of LAs stated they had found no evidence of how offenders had identified their victims (compared to 76% in 2013/14).
		7. **81%** of LAs are involved in a regional DSC working group of some sort.
	2. **Referrals by LAs to regional and national tasking**
		1. In the 2013/14 survey, 26% of LAs were unable to report on how many referrals they had made of DSC cases through regional tasking. On average, of those who were able to report 86% of LAs made no referrals to regional tasking.
		2. In this year’s survey, on average **85%** of LAs made no referrals of cases to regional tasking.
		3. In addition, this year’s survey shows that **92%** of LAs have made no referrals of cases to national tasking.
		4. The project team therefore remain concerned about the ability of LAs, most notably those 60% of LAs who are only able to allocate 1 or less FTEs to DSC work, to be able to develop cases sufficiently to identify the full extent of the offending and OCGs who need to be tasked regionally or nationally.
	3. **OCG mapping and awareness**
		1. The survey results show that **94%** of LAs had not had any OCGs scored in the past year on the scoring matrix. As access to the scoring matrix has only previously been available locally through forces or Regional Organised Crime Units (ROCUs) who facilitated scoring, this is perhaps not surprising.
		2. As the NTSIT now have direct access to the scoring matrix, this should assist those LAs who wish to put the offenders through the matrix. This should also assist those LAs or Scambuster teams gain access to resources from other agencies.
		3. In addition, **59%** of LAs stated they are unaware of the OCGs who are of interest to their local force, regional forces and Regional Organised Crime Unit.
		4. These results are very concerning. LAs should ensure they are fully familiar with the OCGs who are impacting on their area and also which other agencies already have on-going investigations in relation to those offenders or hold relevant intelligence.
		5. This is perhaps a further indication of the low level of intelligence enquiries and investigations being conducted at LA level and the failure to identify additional offending / the full extent of offending.
	4. As a result of the findings of the first project report to NTG in March 2014, the project team identified three main categories of offenders as follows:
2. Legitimate Guise offenders
3. Chancers / Apprentices
4. Professional / Career Offenders (OCGs)
	1. The team made a recommendation in the project report that OCGs engaged in DSC were receiving an inadequate response from the profession and other agencies and that further work needed to be carried out to examine this issue.
	2. The aims behind this further work were as follows:
5. To provide an improved intelligence picture and to add data to the DSC project and evidence to support findings and recommendations made to the NTG and NTS.
6. To identify current and emerging threats from OCGs involved in DSC.
7. To share and compare data with partner agencies (for example Operation Liberal, the NCA, HMRC and ROCUs) to help formulate plans for intervention in relation to each OCG and joint-working opportunities.
8. To produce tasking packages for regional and national tasking with a view to tasking Scambuster teams.
9. To add to the existing NCA OCG mapping, by contributing to the mapping process in relation to OCGs identified by trading standards and also by scoring new OCGs.
	1. Three key work streams were identified by the project team to assist with this work:
10. A trial to be conducted within the Yorkshire & Humber (Y&H) Region over a three month period running from 1st June 2014 – 31st August 2014 involving all eleven LAs in the region. The trial would be run by the DSC project team with co-operation from all eleven LAs.

All new DSC incidents were to be notified to the project team during the trial period, to enable them to carry out some intelligence development work in relation to the incidents. This would include looking for connections between incidents and to identify offending by OCGs.

1. Analysis of the data held by the NCA in relation to mapped / scored OCGs with intent to commit DSC, to see what intelligence held by trading standards may add value to that held by other agencies and enable enforcement and joint-working activities to take place.
2. An intelligence requirement to be sent out to all RIAs with a request for them to identify, with the assistance of all LAs, the top three OCGs causing harm and detriment within their regions.
	1. **The Y & H Regional Trial:**
		1. A regional trial was conducted by the project team in the Y & H region between June and August 2014. The basis of the trial was to provide a central resource to receive all new reports of DSC from the eleven LAs within the region and to identify repeat offenders and OCGs causing the most harm. The team also had a remit of intelligence and investigation development, with a view to submitting referrals to regional and national tasking, as appropriate, for investigations to be allocated to Scambuster teams.
		2. A total of sixty-two referral forms were sent through to the project team by the eleven LAs in the Y & H region during the project period. However, the majority (40 / 64.5%) were sent through by the referring LA for “information only” and not for further development by the project team.
		3. The project team also identified that, in fact, at least two hundred and six DSC complaints were made to the CACS during the three month period in relation to residents based in the Y & H region.
		4. The response to the trial was disappointing in terms of engagement from all eleven LAs. In some cases, this was due to resource levels in the LAs which meant they did not have the resource available to refer DSC incidents to the project team.
		5. Despite the poor engagement with the project team, the intelligence development that was achieved by the project did enable offenders to be identified which would otherwise not have happened, including OCGs, and for tasking documents to be produced.
		6. The trial identified a number of key issues:
3. A complete lack of forensic capability for most LAs to submit items for analysis including fingerprinting and DNA, to assist with the identification of offenders.
4. The failure of LAs to examine notifications from the CACS database which contribute to the complete intelligence picture and identify further evidential opportunities.
5. A willingness to leave incidents to police forces to deal with, due to limited resources, resulting in a lack of full intelligence submissions to the trading standards intelligence databases.
6. A failure to engage with Operation Liberal and to seek intelligence showing the true extent of the offender’s offending and operating and to identify those OCGs who are already scored.
7. A failure to develop intelligence in relation to incidents where the consumer stated they were happy to go ahead with the work, including no subsequent contact with the consumer to find out if they were happy with the work once it was completed, whether the price they were quoted was inflated at the time of payment, whether a specific payment method was insisted upon, whether the quality of the work has deteriorated since completion and whether they said they were happy with the work at the time of the incident due to fear of repercussions from the offenders.
8. A lack of engagement by LAs with the project. In addition to the low number of referrals compared to the two hundred and six CACS records, there will also have been an additional number of incidents reported direct to the eleven LAs by the police, care staff, neighbours etc, which could not be directly accessed by the project team.
9. The trial was proposed to the Y & H Executive on the basis that delegated powers authorities would be signed by the LAs to authorise the project team members to make enquiries requiring powers on their behalf, to enable a case to be developed. At a meeting in May 2014 the Executive raised concerns about this approach and stated they would prefer the project team to identify lines of enquiry that officers in the LAs could then carry out under the direction of the project team, to help them learn how to conduct DSC investigations. The project team raised concerns about this at the time, on the basis that it would slow the whole process down in what was already a very time-limited project. Despite this, the Executive wanted their approach to be adopted. There were a couple of exceptions to this, where LAs were prepared to sign delegated powers authorities. Delays were in fact experienced by the project team when asking for officers in LAs to undertake enquiries. There were also issues with officers from LAs being available to work outside normal office hours, should that be necessary to deal with arrests and interviews of offenders etc.
	* 1. **Operation Nail:**
		2. A referral form was received during the trial in relation to an OCG operating within, and based within, the Y & H region. This led to an investigation named Operation Nail. A second incident in the region relating to the same OCG was identified by the project team searching the CACS database. A third incident was then reported to North Yorkshire where the project team were hosted. Further incidents were found to have been reported directly to a Y & H LA by their local force.
		3. Intelligence development by the project team then identified a total of sixteen victims across the Y & H region, the East Midlands and Scotland.
		4. The offending involved vulnerable and elderly householders being targeted for bitumen work to their drives. An initial price of £25 was quoted by the offenders. When the work had been completed, being poor quality, inappropriate and incomplete, the consumer would be asked for an inflated price, being told the price was in fact £25 per square metre.
		5. Cash payment was demanded and victims were taken in the offending van to make cash withdrawals. In many cases, paperwork which had been issued by the offenders had been stolen back from consumers without their knowledge, to reduce the fingerprinting opportunities.
		6. The offending vehicle was unregistered, uninsured and had no MOT. So there were no direct links to connect the offenders to the vehicle. However, intelligence relating to police stop checks of the vehicle identified the males making up the OCG. They were a family OCG from the travelling community.
		7. Opportunities to identify further victims and the full extent of the OCGs’ offending were limited as a result of their insistence on cash payments. This was primarily as a result of a previous Proceeds of Crime Act confiscation order against the main offender, meaning they did not use bank accounts and accept cheque payments.
		8. The OCG was referred to regional tasking and tasked to the Y & H Scambuster team. An operation was then undertaken on their behalf and at their request by the project team, to secure the arrests of the offenders, to conduct initial interviews and to secure the seizure of relevant evidence.
		9. Following the initial arrests, the project team were then asked to compile the investigation file and to carry out further interviews of the suspects.
		10. Evidential sources relied upon in the investigation file included extensive fingerprinting results (where paperwork had been kept by victims), identification procedures, ANPR evidence, evidence seized from the offender’s premises during the multi-agency operation, evidence taken from the offending van (which was seized from a supermarket car park before the arrests), and phone data and analysis.
		11. Prior to the arrest operation, assistance was secured by the project team from Operation Liberal, four forces and the NCA.
		12. Some issues did arise during the case. The offenders were released from bail and their associated bail conditions by the Y & H Scambuster team, without consultation with the project team as to why the bails and conditions should remain in place. In addition, cash and vehicles seized as evidence of money laundering were returned to the offenders. Further, it is standard procedure to take a final set of fingerprints from the offenders on charge in custody, to enable the fingerprint results to be compared one final time to the offender’s prints. Due to them being released from bail, this has not happened. The project team also suggested to the Scambuster team that one method of identifying additional victims, to enable the true extent of the offending to be demonstrated to a court, would be to issue a press appeal for further victims. This was declined by the Scambuster team. In addition, the project team were offered a surveillance resource by the NCA to identify further offending on bail, again to assist with identifying the full extent of the OCGs offending, but also enable the offenders to be remanded in custody on charge. This was also declined.
		13. The Y & H Scambuster team also raised concerns about a lack of communication from the project team. These concerns are acknowledged by the project team.
		14. This case very clearly demonstrates the harm caused to victims by OCGs. In one case, a single male in his 80’s refused to pay for the work to his drive in November 2013 because he was not happy with the quality of the work. He was then physically assaulted by the offenders. They then returned to his property in July 2014 and demanded payment again. A couple in their 80’s also refused to pay in August 2014, a week before the arrests were made, because they were not happy with the quality. They then received three threatening phone calls from the offenders. They told the project team that they were putting a chair under the door handle in their bedroom at night and taking it in turns to sleep in shifts through the night, so they could listen out for noise in case the males broke into their home to harm them. A further victim was close to tears when being video-interviewed as she talked about the fact that she had been forced to use money she had set aside for her funeral to pay the offenders.
		15. Evidence recovered during the arrest operation indicates the OCG had also been offending in Europe and Australia. Since the offenders have been released from bail, further intelligence has been received by the project team that one of the OCG members has travelled to Germany to offend.
		16. Compare this case against a “legitimate guise” company undertaking a green deal scam, where individual consumers are called by phone and told about a boiler replacement scheme, where they could pay £200 to have a boiler assessment carried out and then potentially get a new boiler. Such cases generate many hundreds of complaints and are therefore very visible to trading standards. Whilst the overall value of the detriment is high, purely as a result of the large number of consumers targeted, the individual harm and detriment to each individual consumer is low. They are unlikely to be vulnerable consumers, unlikely to be repeat targeted by the same offenders and certainly not by OCGs. The project team believe Operation Nail perfectly illustrates why the harm and distress caused by OCGs is far greater than that caused by legitimate guise offenders and that this is the justification for arguing that OCGs need to be dealt with as a priority by the profession.
		17. A decision is now awaited from the Y & H Scambuster team regarding their intended action against the offenders.
		18. **Operation Rodeo:**
		19. In addition to the above case, two incidents were also identified in the trial regarding a prolific sole offender already know to North Yorkshire Trading Standards (NYTS). He had been prosecuted by the CPS in 2008 as a result of a prosecution file compiled by NYTS and received a custodial sentence.
		20. Intelligence development undertaken by the project team identified further incidents in North Yorkshire, West Yorkshire, Derbyshire and Northamptonshire.
		21. The LA who made the referral to the project team did sign a delegated powers authority for this case, which enabled the project team to make extensive enquiries regarding the offender and his offending.
		22. During the course of the investigation development by the project team, the offender was charged with three Fraud Act offences by North Yorkshire Police. He subsequently failed to turn up at court and an arrest warrant was issued. The offender also failed to turn up on bail for West Yorkshire Police and a wanted marker was also placed on PNC by them.
		23. A later incident identified by the project team also led to Derbyshire Police placing a wanted marker on PNC.
		24. It was not possible for the project team to place a wanted marker on PNC, due the fact that the profession does not operate a 24hr service, seven days a week.
		25. The latest incident involving this offender occurred in January 2015 in Derbyshire and investigations are currently being undertaken to try and locate the offender for arrest and interview. This includes analysis of his known movements using ANPR data.
		26. This offender operates in the same way and to the same extent as an OCG, with the exception that he generally operates alone, or with an unidentified male. His *Modus Operandii* is to initially approach victims stating he is from a local, named garden centre and to offer bags of peat for sale. He then suggests gardening and landscaping work to the victim, takes money up front and then fails to complete the work and / or carries out substandard and over-priced work.
		27. He then goes on to groom and befriend the victims extensively. He makes false claims to extract further money, for example by claiming he has cancer and needs money for hospital treatment, and repeat offends against them over a number of weeks and months.
		28. For particularly vulnerable victims, he becomes familiar with their movements and behaviours. In the offending identified by the trial, the offender had learnt the movements of the couple. As a result, he repeatedly targeted the husband, who was experiencing memory problems, when he knew the wife would not be present. He took several thousand pounds from them that they had recently inherited after the death of the husband’s brother.
		29. At the time of writing this report, the offender remains wanted for arrest. An evidence file has been compiled in relation to the offending in the Y & H. The project team also made contact with the CPS regarding the need to join up all the existing cases and to prosecute the cases together, to achieve the best possible result at court.
		30. A number of further potential OCGs were identified during the regional trial by the project team. These were unable to be developed further due to the absence of fingerprint hits when documents were submitted for forensic analysis by the project team, insufficient intelligence being obtained by the LA to enable the development of the cases, and the capacity of the project team.
		31. A further referral related to offenders from a specific traveller site which is currently the subject of a major investigation by the local force in relation to DSC and slavery / forced labour.
		32. Two referrals related to fish seller complaints which were connected to Operation Arwen.
		33. A number of referrals related to “legitimate guise” offenders who were under investigation by other TS services. Two “legitimate guise” companies were sent through to regional and national tasking by the project team.
		34. Some referrals were left with the local police force by the referring LA, and others were purely civil matters in relation to historic work at the consumer’s address subsequently failing.
		35. The Y & H Regional Intelligence Analyst (RIA) produced a short report for the project team regarding why the Operation Nail offenders would not routinely have been identified for tactical tasking in the region, without the trial.
		36. Essentially the report stated that, due to capacity, tactical tasking for the region focussed on those traders who generate ten or more complaints during the relevant period. As the Operation Nail offenders had only produced two complaints on the CACS database, they would not have been flagged for tasking. There had also only been two separate Memex reports submitted during the trial period.
		37. The same applies in relation to the Operation Rodeo offender. The reason for this is that there was only one Y & H incident reported. Other incidents were reported in other regions and to police forces only. Without the work of the project team, the full extent of the offending would not have been identified and opportunities to co-ordinate the prosecutions to maximise sentencing would also have been missed.
		38. This goes to show the potential failings of the current analysis of DSC incidents by the RIAs. One complaint may actually be sufficient to identify an OCG, but the project team believe this would not routinely be examined or developed by all the RIAs. That work would be dependent on resources being available in the LA to carry out those enquiries, which frequently does not happen. This has proved to be the case on many previous OCG investigations conducted by NYTS. Those offenders who are likely to be identified by the RIAs using this method are likely to fall largely in the “Legitimate Guise” category of offending.

**10.8a The project team recommends that the Y & H regional trial template be replicated and applied in other regions.**

**10.8b The project team recommends that consideration should be given to adapting the way in which the RIAs and LILOs currently undertake analysis of DSC incidents.**

**10.8c The project team recommends that the NTG give consideration to allocating additional resources to the RIAs, to provide an intelligence development capability in relation to regional DSC offending.**

* 1. **Analysis of the NCA OCG data:**
		1. Following the findings of the initial project report in March 2014, a request was made by the project team to the Organised Crime Co-ordination Centre at the NCA for access to their data cut of all scored OCGs with an intent to commit DSC and distraction burglary.
		2. The request was delayed as a result of the NTSIT setting up a formal Information Sharing Agreement with the NCA with regards to access to OCG data more widely.
		3. A dedicated officer from the NTSIT then started to receive quarterly data cuts from the NCA of all scored OCGs with intent to commit DSC and distraction burglary. This did not commence until the end of August 2014 and this delayed the ability of the project team to commence this work strand.
		4. Initial analysis of the data cut for Quarter 1 has now taken place, with the aim of identifying those OCGs who are of greatest interest to trading standards in relation to DSC.
		5. This has been achieved by searching for key words such as “rogue” or “distraction”. The Quarter 1 data cut originally contained nearly two hundred scored OCGs. The filtering process identified thirty-one that were of most interest to trading standards.
		6. Priority was then given to a small number of OCGs. These were identified as having also been referred by LAs and RIAs as a result of the top three OCG intelligence requirement sent to RIAs at the request of the project team (see 10.10 below) and as having been identified by the Y & H trial described above.

Analysis of each OCG has included the following:

1. Contact with the relevant force where the offender is living to obtain up to date intelligence.
2. Contact with the force responsible for the OCG scoring, if not the same force as above, to obtain up to date intelligence.
3. Contact with Operation Liberal to obtain up to date national intelligence.
4. Contact with the Operation Liberal force SPOCs in relevant forces where offending had taken place / the offenders were resident.
5. Searching of Memex and IDB to obtain trading standards intelligence relating to the OCG.
6. Contact with specific trading standards authorities holding intelligence in relation to the OCG.
7. PNC enquiries in relation to the nominals and their vehicles, including to determine which of the nominals has relevant previous convictions or are currently serving custodial sentences / otherwise disrupted.
8. JARD enquiries to identify POCA interests in the OCG nominals.
9. CACS research on relevant OCG trading names / nominals / phone numbers etc, to identify recent incidents of interest.
10. Intelligence requests to the NFIB to determine if they hold any relevant intelligence in relation to the identified OCG.
11. Intelligence enquiries with HMRC, to determine what, if any, income had been declared by the nominals / what tax avoidance may have taken place.
	* 1. Subject profiles were then produced in relation to three of the identified OCGs which had been researched and developed.
		2. Contact was then made with a number of agencies with interests in the offenders, to request their attendance at a multi-agency meeting to discuss the subject profiles and what enforcement opportunities existed or could be developed. This included two ROCUs, two Scambuster teams, HMRC, Operation Liberal and a number of forces.
		3. The first multi-agency meeting took place on 5th March 2015. Four subject profiles relating to separate OCGs were discussed, including one which was identified as an emerging threat issue in the Y & H region prior to the meeting. This OCG was not scored at this time.
		4. The results of the meeting further illustrate the issues facing the profession and other agencies. All agencies recognised that the OCGs did indeed have an intent to commit DSC offending against the elderly and vulnerable, and that it was likely they were doing so on a daily basis. However, they were also concerned about the low level of intelligence held in relation to the offenders and the consequences this would have in terms of accessing additional resources, such as surveillance teams, both in terms of having sufficient intelligence to complete a Directed Surveillance Authority but more importantly the likelihood of being granted any surveillance resource when competing with other priorities such as child sexual exploitation, counter-terrorism, firearms and drug supply.
		5. The low level of intelligence in relation to the OCGs is primarily a result of the low reporting levels for DSC victims, for all of the reasons identified in the project report from March 2014, and not as a result of low levels of offending by the OCGs.
		6. It was agreed at the meeting that additional steps would be put in place to gather further intelligence regarding the OCGs, to see if they could be developed into cases which could be tasked for investigation.
		7. Some of the issues surrounding this method of OCG analysis include:
* The historic nature of some of the scored OCGs.
* The inclusion of OCGs in the data whose offending may involve some element of travelling to offend, but whose offending may not constitute DSC, and the time required to filter the data.
* The time required to properly research the relevant trading standards intelligence databases relating to those identified OCGs.
* The lack of up-to-date intelligence regarding incidents, due to low reporting rates.
	+ 1. One of the OCGs was identified in the NCA Q1 data cut, in the top three OCG request sent to the RIAs, and from the Y & H regional trial. This specific OCG was therefore given priority in terms of development for a problem profile. Despite this, there was still insufficient intelligence available to task the investigation to any agency, including the Scambuster team for the relevant region.

**10.9a The Project team recommends that receipt of the NCA data cuts by the NTSIT needs to continue beyond 1/4/15, including thorough analysis of the data at the end of each quarter.**

**10.9b The project team recommends that one designated officer at the NTSIT should be responsible for the analysis of the above, intelligence requests to relevant partners and the production of problem profiles.**

**10.9c The project team recommends that the designated officer at the NTSIT should also be responsible for intelligence analysis in relation to the receipt of new 5x5x5 forms at the NTSIT on Memex and IDB regarding DSC.**

* 1. **Top three OCG RIA / LA request:**
		1. An intelligence requirement was sent to all RIAS by the NTSIT in July 2014, at the request of the project team, requesting the identification of the top three OCGs impacting on their regions for DSC. Due to a lack of responses, the deadline for returns had to be extended. Results were finally received by the project team in December 2014. This delayed the ability of the project team to progress this area of work.
		2. Only seven out of one hundred and sixty-six LAs replied to the first intelligence request through their RIAs, identifying thirteen potential OCGs nationwide. The vast majority of those fell within the East Midlands area. Some represented “legitimate guise” offenders, as opposed to OCGs (including those from the travelling community).
		3. Three of the OCGs identified were also found within the NCA Quarter 1 data cut detailed above, resulting in those OCGs being given the highest priority in relation to intelligence development.
		4. Due to the poor RIA / LA response to the intelligence requirement, a further request was sent out to RIAs in early February 2015 by the NTSIT. This time only two LAs responded to the request.
		5. The project team believe that using intelligence requirements for identification of current OCGs of interest should be the most effective way of determining which OCGs are causing the most harm and detriment to consumers and which should be prioritised for enforcement and tasking. However, this relies on co-operation from the RIAs and individual LAs and a willingness to share intelligence on a regular basis. It also relies heavily on the RIAs and LAs actually being aware of which OCGs are impacting on their areas for DSC offending. The results of the Y & H regional trial suggest that this may not always be the case, due to the lack of intelligence enquiries by LAs.

**10.10a The project team recommends that the designated officer at the NTSIT should send the top OCG intelligence requirement out to RIAs on a two-monthly basis, to identify new OCGs causing harm and detriment through DSC. The intelligence received should then be further developed.**

**10.10b The project team recommends that the RIAs should conduct some intelligence analysis on a monthly basis to identify DSC offenders currently causing harm to vulnerable consumers within their regions and should liaise with other RIAs and the NTSIT regarding cross-regional offenders.**

* 1. **NFIB Data:**
		1. Following the work undertaken by the project team in early 2014, further intelligence was received by the project team from NFIB in June and August 2014. Analysis of the NFIB data to date has raised a number of concerns.
		2. Firstly, decisions made regarding dissemination of the incidents are in part based around the total number of reports received regarding the offender and the total amount of financial detriment to victims. Although there is some consideration given to vulnerability of individual victims, a large percentage of reports had not been disseminated to any agency. As a result, some investigative opportunities are being missed, as are intelligence development opportunities and safeguarding opportunities. In the vast majority of instances, no intelligence dissemination at all had been made to trading standards services. The exceptions to this were where a local force had made trading standards colleagues aware of an incident directly.
		3. Secondly, even where dissemination has occurred, some police forces were unable to find the incident on their systems, despite dissemination by the NFIB, and others reported that no action was taken in relation to the incident, including any safeguarding of the victim. In many cases, the force had failed to record the incident as a “crime”.
		4. Intelligence requests made by the project team to NFIB regarding specific nominals identified by the project team’s OCG work have resulted in further intelligence being obtained. This has identified further incidents and victims previously unknown to trading standards. For example, two new victims were identified for Operation Rodeo. This highlights the value of LAs making intelligence requests to NFIB.

**10.11a The project team recommends that the monthly intelligence reports currently received by the project team from the NFIB be continued and received and analysed by a designated officer at the NTSIT.**

**10.11b The project team recommends that intelligence requests to NFIB form an integral part of enquiries made by officers in LAs and by RIAs and Scambuster teams, to improve the intelligence picture in relation to DSC.**

* + 1. In February 2015 the project team delivered four awareness raising training sessions to the advice line staff at Action Fraud in Manchester and Edinburgh. The purpose of the training was to increase their awareness about the scale and seriousness of DSC, to ensure they were able to identify it and correctly classify it from reports made to them, and to sign-post cases and reporters to the relevant agencies, including trading standards via the CACS. Advice was given regarding specific enquiries to be made when receiving reports, for example, whether the offender/s were expected to return, whether any safeguarding issues were identified, whether any forensic opportunities exist, for example whether paperwork had been left or CCTV evidence could be secured, and whether any intervention opportunities exist, for example to prevent payment being made or to secure arrests.
		2. The following feedback was received in relation to the training:

How would you rate your knowledge of Doorstep Crime before the training?

***Average 5.5***

Did you find the session useful for your job?

***Yes***

Did you find the session interesting?

***Yes***

How would you rate your knowledge of Doorstep Crime after the training?

**Average 8.8**

How has the training helped since you received it?

• ***It has helped to raise my awareness of how doorstep crime is perpetrated.***

***• The training has informed me what type of information about these circumstances would be specifically relevant on a report, which organisations to refer potential victims to and how they can help.***

***• The training also gave me a more comprehensive idea of the intentions behind such scams and how they can affect victims."***

***• Being able to be more aware of crime being committed and how to handle the calls received...***

***• It has helped me in identifying and handling associated calls.***

***• Yes. I now have a better understanding of how/why they are being targeted and which allows me to give better advice/referrals on the call to assist the victim.***

***• It has made me more aware of the dangers of this type of fraud and the consequences.***

***• This training has really helped to highlight how doorstep criminals operate and how they target victims. As a service, this has helped us to identify this crime type more clearly and be in a position to offer further support and advice to victims/potential victims.***

***• Really gave an insight into what Trading Standards can do and how involved they are able to get to help victims. Gave a clearer picture of what some of the victims are put through and the extreme lengths the fraudsters will go to prey on vulnerable people.***

***• It has given me a clearer understanding of how Organised Crime Groups work to defraud people***

***• I found the training very interesting and informative which has helped me gain a better understanding of doorstep crime.***

***• I have more understanding of the types of doorstep crime, the impact this can have on victims, and how Trading Standards can help.***

***• Increased awareness of the multi-stage structure of doorstep crime, especially how certain types of door-to-door sales that we would regard as being consumer issues can be used to scout for vulnerable victims for future fraud crimes.***

***• It helped to give a fuller picture behind the crime and how it can be associated with other crimes.***

***• Definitely, I am now listening more carefully to elderly people when taking reports since they are more likely to be victims of this type of fraud.***

***• The training has provided context as to what Trading Standards are practically doing about these things. It has also helped on calls when people have been the victims of doorstep crime, knowing for example that this can be reported to Trading Standards and so on.***

***• I have a wider understanding of the work that Trading Standards undertake and how this relates to what Action Fraud does.***

Would you like the opportunity to have similar sessions from other Trading Standards project teams, eg: e-crime and scam?

***Yes***

Do you have any other comments about the training?

• ***The training was incredibly insightful, especially the case studies, and learning how suspects find victims in order to befriend them in order to carry out these crimes.***

***• I think the more visits like this that we have, the more understanding of specific areas of fraud we'll gain which in turn would lead to more efficient calls and report taking.***

***• Not only did the presentation increase my knowledge of the doorstep crime but also what Trading Standards can do to help the police make arrests and protect and support victims.***

***• I thought it was an excellent presentation with clear and useful information and would be happy to attend any future training courses.***

***• The training was interesting and well presented. It would be beneficial to have more of this type of training in other areas.***

***• Found the training really interesting and very motivating. I would certainly appreciate the chance to have more training opportunities like this.***

***• It was a shame the session couldn't have been longer, as it was a limited time slot.***

***• Very enjoyable. A really good training session. It was particularly interesting to hear about the individual case studies.***

***• The section about the prosecution/outcomes was well worth the time spent being included, It helped show the work we do leads to justice, as being a reporting service, we often don’t hear any feedback on what happens with reports after they are submitted.***

***• The training was insightful, and I think it should be utilised more, since it will provide more knowledge to all advisors,***

***• I would like to add that the trainer was very competent and I very much enjoyed the information she delivered which was very relevant and the examples were very interesting.***

* + 1. **Emerging threat**

There is currently an emerging threat in relation to offenders impersonating trading standards officers and police officers. These offenders are cold-calling previous victims of DSC and claiming that, if the victim pays them further monies, they will be able to investigate the historic offending and get the victim’s money back.

* + 1. One such OCG is the subject of Operation Kanteen, which has been co-ordinated by Operation Liberal. Over £1m of offending has been identified, spanning a number of LA and police force areas. Efforts are currently being made to secure the assistance of a lead force to progress the investigation.

**10.11c The project team recommends that the NTSIT be tasked with conducting further research into the emerging threat of DSC offenders posing as police and trading standards officers, with a view to identifying OCGs involved in the offending who can then be put through the tasking process.**

1. **Partnership working with the third sector:**
	1. During the initial phase of the project between October 2013 and March 2014, the project team identified a number of key partners from the third sector who could help the profession to tackle DSC through increasing awareness and reporting and in assisting to safeguard victims. These included Age UK, the Alzheimer’s Society, and the Silver Line. Contact was also made with Action on Hearing Loss, Diabetes UK, the Stroke Association, the Campaign to End Loneliness, the British Heart Foundation and the Royal National Institute of Blind People.
	2. Developing engagement with these partners and others was identified as a key priority for the project team’s action plan in 2014/15.
	3. Age UK and Age Cymru were also key partners on the CPP DSC working group and took part in promoting National Consumer Week.
	4. The Alzheimer’s Society and the Silver Line both attended at the national DSC conference held for the profession in April 2014 to increase awareness of the services they provide and how they can assist in tackling DSC. This included the opportunity to hear from Trevor Jarvis, who is living with dementia.
	5. The project team also engaged with the Silver Line, Age UK and the Alzheimer’s Society to deliver training to their advice line staff who are engaging with older adults, many of whom are vulnerable, on a daily basis. As a result, training sessions were set up to improve the advice line staff’s awareness and understanding of DSC, their role in passing on intelligence regarding victims, incidents and offenders and also their role in assisting with the safeguarding of victims.
	6. Two sessions were delivered to the Silver Line advice line staff / telephone befrienders in August 2014.
		1. The following feedback was received regarding the training:

How would people have rated their knowledge of DSC prior to the training (scale of 1 – 10, with full knowledge being a 10 and 1 being no knowledge)?

***The training we received was fantastic.***

• Did they find the sessions useful for their day job?

***Score 10***

***We found it very useful, in fact we have now rolled it out to the other 130 employees we have. It’s great for us all to know what happens behind the scenes and really shocking to see vulnerable people being treated in this way.***

• Did they find the sessions interesting?

***Score 10***

***It was very interesting. Lots of work goes into it, which shows in the results you have achieved.***

• How would they rate their knowledge of DSC after the training (scale of 1-10 as above)?

***Score 10***

• How has the training helped since they received it?

***Score 10***

***It has opened our eyes to what can happen. We now have on our national database the consumer helpline number and also a spread sheet of any potential doorstep crime that someone may report.***

• Would they like the opportunity to have similar sessions from other NTSB project teams, eg: e-crime and scam?

***Score 10***

***I think any additional training would be invaluable, we at The Silver Line would be grateful for any further development.***

• Any other comments?

***Alex and Ruth were very professional throughout the whole training session. They were very knowledgeable and you could see the amazing passion they had for their job and helping prevent further people being scammed. The presentation was delivered to the highest quality and it was a pleasure to re-deliver the training to the rest of our vast team.***

Other comments:

* ***Interesting and very useful. Good to signpost callers to.***
* ***I found it interesting yet sad. I was aware of some of the scams but feel more empowered now with the shared information.***
* ***I also have a different view of trading standards and feel confident to “share not scare” with any of our callers if I feel they are being taken advantage of. I now would recommend contacting trading standards if someone is unsure as to the authenticity of a tradesmen or “friend”.***
* ***I found it very useful for both the job and in my personal life (my nana recently had a leaflet put through her door stating that her boiler needed looking at and that there would be a fine if it wasn’t done! – she checked with Eon and it was a false leaflet). It certainly changed my perception as I really didn’t realise how much goes on out there.***
* ***I have on a few occasions spoken with our callers & referred them to trading standards.***
* ***I have also directed them towards 101 and explained the process as the mention of police did put some people off until they were made aware of how this process would works.***
* ***For me a very positive training programme***
* ***I found it very informative and also quite sad. Certain people are still very vulnerable in life and to target these people showed that it is still easy to gain their confidence in order to `rip them off`.***
* ***Luckily trading standards are there to help protect these vulnerable people.***
* ***Some of the statistics were very interesting, just scale, amounts involved.***
* ***Glad I did the training. Thank you.***
* ***I thought that the training that was delivered around doorstep crime was a useful workshop. It got its main points across and it outlined the different sorts of criminals that carry out such crime, i.e. opportunistic and professional. It does not shock me to hear that such criminal activity does exist, and from an opportunistic point of view I think that it will always happen. I do think that our callers, as much as we can, should report such crimes but I do find with the older generation they like to see the good in everyone and don’t want to cause trouble and this just adds to their vulnerability. The professional criminals are good at what they do, by the way that they befriend people they are targeting. This could be harder to detect with our callers, because the callers may see that they are their friends.***
* ***I found it useful and informative but as a telephone helpline with no face to face contact I think it would be challenging to get to know the full story. We can only hope that older people continue to report this crime (and their families) thus cracking down on doorstep crime.***
	1. Two sessions were delivered to the Alzheimer’s Society advice line staff in September 2014.
	2. The following feedback was received regarding the training:

How would people have rated their knowledge of DSC prior to the training (scale of 1 – 10, with full knowledge being a 10 and 1 being no knowledge)?

***Probably around a 4.***

•             Did they find the sessions useful for their day job?

***Yes, as our callers / the people who are cared for by our callers are likely to be most susceptible to scams of this type.***

•             Did they find the sessions interesting?

***Yes, very.***

•             How would they rate their knowledge of DSC after the training (scale of 1-10 as above)?

***Around a 7.***

•             How has the training helped since they received it?

***It’s made us more aware about these types of scams and the lengths to which scammers will go to befriend and ingratiate themselves with their victims.  It was also helpful to note that personal information about people is passed around from one scammer to another, which makes some people very susceptible to further frauds of this type.  This has helped in terms of speaking to callers about potential ways to protect their relatives from this, and highlights the importance of things like Power of Attorney too.***

•             Would they like the opportunity to have similar sessions from other NTSB project teams, eg: e-crime and scam?

***Yes.***

•             Any other comments?

***It would be helpful to have more training in specific ways that callers could protect themselves from these scams.  It was interesting finding out about specific cases, and so on, but I think having more strategies or tactics to avoid/combat these scams would be useful for us to pass on.***

* 1. Two sessions were delivered to the Age UK advice line staff in December 2014. A further request was received from Age UK to deliver additional training to their “Call in Time” staff (a telephone befriender service). However, due to the existing commitments of the project team, it was not possible to deliver this training before the end of the project work in March 2015.
	2. The following feedback was received regarding the training:

How would people have rated their knowledge of DSC prior to the training (scale of 1 – 10, with full knowledge being a 10 and 1 being no knowledge)?

***We probably would have rated it around 7 but after the session we had with you we realised it would have been more like 4. We didn’t know how much we didn’t know.***

Did they find the sessions useful for their day job?

***Yes, very. We feel much more confident in dealing with customers who have or may have doorstep crime issues.***

Did they find the sessions interesting?

***Yes, they found it very interesting. I had a great deal of feedback at the time all of which was very positive and everybody was very engaged with the session.***

How would they rate their knowledge of DSC after the training (scale of 1-10 as above)?

***Probably 8/9.***

How has the training helped since they received it?

***We are better able to identify DSC or potential DSC on the phone with our customers and we have a great deal more confidence in the advice we give them as to how to take their issues forward.***

Would they like the opportunity to have similar sessions from other NTSB project teams, eg: e-crime and scam?

***Yes, I have some numbers to follow up on and will do that soon.***

Any other comments?

***We are very grateful to you for coming and delivering this, it was enormously worthwhile for us, very interesting and presented in a lively and engaging way.***

**11a The project team recommend that the NTG encourages the NTSST and the NTS e-Crime Team to engage with the third sector advice lines and deliver training regarding scams and e-crime.**

* 1. The project team were also asked to present at regional Dementia Action Alliance events and a regional Campaign to End Loneliness Event.
	2. The CPP members requested some sanitised case studies that could be used by partners during their awareness raising and media work. These will be provided by the project team.
	3. In this year’s national survey **64%** of LAs stated they have a trusted trader scheme of some sort.
	4. It is important to note that Age UK have joined forces with Trustmark, to ensure that older adults have the ability to identify trusted traders to carry out work at their homes.
	5. Age UK and Trustmark have also requested statistics from the project team regarding the scale of DSC and the age and vulnerability of DSC victims, to support their efforts to promote the Trustmark scheme as a reliable trusted trader scheme for older adults.
	6. **National survey results regarding partnership working:**
		1. The following table shows the key partners and levels of interaction with them by individual LAs:
		2. The above results demonstrate the consequences of reduced budgets for LAs. There are reductions in the number of LAs engaging with nearly all partner agencies.
	7. To improve engagement with partners in the voluntary sector, and also partners in the financial sector, health and safeguarding, a conference was held for all stakeholders on 6th October 2014.
		1. The conference included presentations from the project team, Operation Manhunt (a specialist DSC investigations unit at Hertfordshire Police), Check-a-Trade, Age Cymru, the SAFER project team from West Yorkshire Trading Standards, and the financial sector.
		2. Sessions were also held for delegates to hear about the plans for National Consumer Week and to discuss their role in tackling DSC.
		3. On arrival at the conference delegates were asked about their current knowledge and awareness of DSC and their current involvement in tackling DSC and safeguarding victims. They rated their knowledge of DSC as follows:

|  |  |
| --- | --- |
| **Non-existent** | **2%** |
| **Low** | **8%** |
| **Medium** | **55%** |
| **High** | **35%** |

* + 1. When asked how they would rate their knowledge of existing enforcement activities to tackle DSC the results were **6.4** out of 10.
		2. When asked how they would rate their knowledge of existing prevention activities the results were **6.4** out of 10.
		3. When asked how they would their knowledge of existing safeguarding efforts the results were **6** out of 10.
		4. **84%** stated they / their organisation was already involved in helping to tackle DSC. **85%** stated they / their organisation was already involved in safeguarding of victims.
		5. After the conclusion of the conference delegates were asked again to rate their knowledge of DSC. They rated their knowledge as follows:

|  |  |
| --- | --- |
| **Low** | **4%** |
| **Medium** | **46%** |
| **High** | **50%** |

* + 1. Delegates were also asked to rate each of the conference sessions out of 10, and the conference overall. The results are shown in the following table:

|  |  |
| --- | --- |
| **Introduction to DSC** | **8.6/10** |
| **Operation Manhunt** | **8.4/10** |
| **Check-a-trade** | **7.2/10** |
| **Age Cymru** | **7.4/10** |
| **SAFER project (WYTS)** | **7.5/10** |
| **Financial Sector** | **8/10** |
| **Plans for National Consumer Week** | **6.7/10** |
| **How can you help?** | **7.2/10** |
| **The conference overall** | **8.3 / 10** |

* + 1. **76%** of delegates stated they now intended to take part in National Consumer Week.
		2. Delegates were also asked what three things they would take away from the conference. The results are shown in the table below:

|  |
| --- |
| Understanding more about doorstep crime, knowing that there are organisations willing to support, recognising the vulnerabilities of those who are being abused |
| contact details for Action Fraud - from the person sat at the same table, details of what North York’s’ TSD is doing, Feedback from the North York’s’ questionnaire |
| Networking and making contacts with likeminded people definitely have a greater understanding of doorstep crime (invaluable both professionally and for personal family reasons) Learnt what solutions are already available and where not to "reinvent the wheel" |
| The contacts made, Learning of interventions currently in place, Learning about the research in this area |
| Networking, Hints/ideas from speakers on how to tackle issues, Introduction to other parties other than TS |
| Very impressed with Coventry Building Society's protocols/attitude regarding doorstep crime. Ideas surrounding specific Officers for safeguarding older people (Herts). Some increased confidence in integrity of the Check-a-trade scheme. |
| Info about the work of the police in this area, Info about how cameras can be used to prevent doorstep crime, General of strategy which is being developed |
| Involving others |
| Examples of good practice, Clearer picture of the role of the financial sector, Networking - useful contacts with organisations working in a similar field |
| Good contact made with CIFAS. An appreciation for how vulnerable adults are seen by many different organisations needing to work in collaboration. Insight into the work done across the financial sector, especially the CIFAS vulnerable adult database |
| The best practice examples were all great and each had different good ideas we can perhaps introduce. |
| Focus on safeguarding, role of the financial sector - emerging trend, networking with colleagues working on similar projects such as the NST work / challenges being faced by colleagues in other areas |
| NTSB priorities in relation to DSC (safeguarding); Good to see what partner agencies do for safeguarding; Focus on NH watch and alerts for NCW |
| The examples of good practice, The determination to lobby government with consistent messages across all partners, The benefits of relationships with partners at a local, regional and national level |
| That we are doing things on a par with other authorities. That we can build on the protecting the victim from future incidents. |
| Statistics given on the victims of doorstep crimes and other research done in relation to older people and repeat victims - already done a training session to professionals and slotted in some of this new information. I will use the stats to improve the way we develop the SAFER Project. For example, working on an initiative to work with hairdressers and local supermarkets. The networking opportunity - we now have several contacts to work together with in terms of prevention and education. |
| DSC survey results will help focus my resources in respect of education campaigns. Meeting external parties such as the Office of the Public Guardian, Camden Adult safeguarding manager - I learnt more about what they do, Check-a-trade was helpful - not all commercial businesses are on the take |
| Presentations prompted better insight into the range of agencies that this agency is relevant to. Meeting people from other agencies. Greater insight into the main DSC victims and DSC practice. |
| Lots of activity going on around the UK, Need for agencies/organisations to join up/share best practice, highlighted that these victims do not necessarily fit the perceived definition of "vulnerable" (i.e.: they are often fairly well off) |
| 1 What the banks are doing - we want to engage with financial institutions in our locality, so the contacts from the conference will be invaluable. 2 What trading standards are doing - I'm going to seek them out and see if the SAB can engage with them and join up what we're both doing on this. 3 Share learning about Operation Manhunt, SAFER and Age Cymru projects with our SAB |
| Creative ways for trading standards and safeguarding adults team to work together. |
| Networking, ideas and positivity! |

* 1. A number of further opportunities exist in relation to working with the third sector. These include the provision of content for websites and magazines for staff, members and carers, attendance at appropriate regional and national events including training events for staff, involvement in key days / weeks / months, such as Dementia Awareness Week and Action on Stroke month.
1. **Partnership working with the financial sector:**
	1. The financial sector, including banks, building societies and the Post Office, have long been recognised by the profession as a key partner in efforts to tackle DSC and protect vulnerable customers. This led to the banking protocol being set up by TSI in 2002 and revised in 2011.
	2. The Victim Impact Survey collated by the project team has demonstrated that, of those DSC victims interviewed, **76%** left their homes each week to visit their bank or building society. This further demonstrates the prevention and awareness raising opportunities that exist through effective partnership working with the financial sector, as well as intervention and enforcement opportunities.
	3. The data recording by LAs currently is not helpful in demonstrating the number of victims who are currently taken to financial institutions by DSC offenders to withdraw funds. Currently only **36%** of LAs record this information.
	4. In addition, only **47%** of LAs record whether a financial institution made the report about the DSC incident after having concerns for one of their vulnerable customers. It is also not clear whether LAs can report on these figures currently, to provide national evidence that can be used to lobby the financial sector.
	5. The project team believe that more widespread recording of the above data would increase the lobbying power of the profession to progress change.

**12.5a The project team recommend that LAs wishing to engage with the financial sector locally, or to provide national evidence which can be used for lobbying purposes, should record details of how many victims of DSC incidents in their area were taken to financial institutions to make withdrawals by offenders and also how many of the DSC reports made to them were made by a financial institution directly.**

* 1. The project team met with both the British Bankers Association (BBA) and the Building Societies Association (BSA) in May 2014, to discuss joint-working opportunities.
	2. In conjunction with the BSA, the project team then presented at their annual Financial Crime Seminar, attended by all building society financial crime leads, in September 2014.
	3. Following the success of the presentation, two articles written by the project team were also published in the BSA magazines *“Consumer Outcomes”* and *“Society Matters”,* to reach a wider audience in the building societies community.
	4. At the request of specific companies, further training has also been delivered to individual building societies, to help them understand their role in identifying and reporting DSC and protecting vulnerable customers and how they may adapt their internal systems to proactively identify victims.
	5. The project team have also been involved in the Financial Conduct Authority’s work in relation to improving the response of the financial sector to vulnerable customers. This work has been carried out in conjunction with a number of partners including consumer bodies, the third sector, the financial sector and trade bodies.
	6. The results to date of this work can be found through the following link:

<http://www.fca.org.uk/news/occasional-paper-no-8>

* 1. The project team have also been involved in the British Standards Institution’s work in relation to providing a BSI Code of Practice to improve service delivery to vulnerable adults. The aim is to provide a Code of Practice which would be organisationally focussed to enable it to be applied to all market sectors including the financial sector, and to cover all areas of financial fraud, including DSC.
	2. An update was received from the contact at BSI on 9th March 2015 to say that the work was progressing in line with the previous workshop discussions. The next steps were identified as a Project Implementation Meeting to take place and the project to be developed over the next nine to twelve months, involving all key stakeholders, with a view to publishing the Code by the end of 2015. The Code would then be trialled for the next two years.
	3. **CIFAS:**
		1. The project team also met with CIFAS in August 2014. CIFAS is a not-for-profit association offering a fraud prevention service. One of their initiatives includes a Protective Registration service designed to protect individuals who have already been identified as victims of fraud from further identity fraud to access credit or products or services. The scheme is currently designed for clients who are the subject of a court order of protection under the Mental Capacity Act 2005. Further details of the scheme can be found at:

<https://www.cifas.org.uk/protecting_the_vulnerable>

* + 1. The following summarises the success of the scheme to date:
* Seven LAs have signed up to the Protecting the Vulnerable service and have submitted their vulnerable client data. This covers, approximately 1,000 individuals.
* CIFAS are engaged with a further twelve LAs who will be sharing their client data.
* CIFAS have recruited a Protecting the Vulnerable Project Manager, demonstrating CIFAS’s commitment to delivering this service.
* The main priority is to sign up as many LAs as possible to extend the scheme coverage to the maximum number of individuals.
* CIFAS have recently signed an agreement with the NFIB to receive details of destination bank accounts used in scams reported to Action Fraud which will be shared under the Confirmed Fraud Risk case type.
* CIFAS are interested to receive details of identified criminals/fraudsters to be flagged as Confirmed Fraud Risk.
* CIFAS offer to data match identified victim details against their fraud database.
	+ 1. The scheme could clearly provide additional protection for those DSC victims who may have had personal details taken by offenders, for example bank account details from cheques paid to offenders or other details accessed by offenders from documents in the victim’s home.
	1. **RBS / Natwest:**
		1. There are some companies within the financial sector who are proactively progressing their efforts to protect vulnerable customers and improve their interaction with law enforcement. One example is the RBS / Natwest.
		2. The Business Community Partner in Branch & Private Banking with Natwest attended the national conference in April 2014 and also presented at the Stakeholder’s Conference in October 2014. Part of the work she is undertaking is making contact on a regional basis with trading standards to discuss joint-working opportunities. They are also shortly to appoint a Community Protection Adviser for the North Region, who will act as a liaison point between front line staff and external agencies.
		3. In the Y & H region, the Branch Community Partner is now working closely with the SAFER project team in West Yorkshire and also North Yorkshire Trading Standards to carry out bespoke activities at local branches. This includes identifying those branches with the highest older adult footfall and planning activities in conjunction with Scams Awareness Month and other key events.
		4. Prior to this, Natwest ran eight pilot sites in the last year in conjunction with local police forces and trading standards services.
		5. This provides examples of the opportunities for LAs in partnership with financial sector partners in their areas.
	2. **Barclays Bank:**
		1. Barclays Bank have also engaged with the NTSST and are keen to engage on a local basis with trading standards services. Further details can be obtained from the NTSST.
	3. **Convention of Scottish Local Authorities:**
		1. In 2014/15 COSLA remade the original “The Bank Job” DVD, to make it available in an updated form to the financial sector, for use in training front line staff and raising awareness of DSC.
		2. The DVD can be accessed through the following link:

<https://vimeo.com/109036581>

* 1. **The Law Society:**
		1. Following attendance at a dementia conference in Manchester in June 2014, the project team were invited to submit an article about DSC to the Law Society *“PS Magazine”*. This publication is specifically targeted at solicitors dealing with and managing the financial affairs of private clients, including those with a Power of Attorney or those with a specific vulnerability, many of whom are older adults. The article appeared in the November issue and included specific advice for solicitors about advising clients not to deal with DS callers, how to spot the signs of DSC with their clients and what to do when it is identified.

<http://communities.lawsociety.org.uk/private-client/ps-magazine/november-2014/>

1. **The Police response to doorstep crime:**
	1. The 2013/14 national survey indicated there is already good engagement between individual police forces and LAs in England and Wales. 98% of LAs said they were working with the police. This level has remained high at **96%** in 2014/15.
	2. However, the levels and types of engagement vary considerably from force to force.
	3. **71%** of LAs stated in the survey that they do not have an MOU in place with their force regarding tackling DSC (compared to 68% in 2013/14).
	4. In addition, there is still no crime recording code for DSC for forces to use, so the ability to measure reports of DSC to forces is very poor.
	5. In September 2015 a survey was devised by the project team and distributed on their behalf by Operation Liberal at Leicestershire Police.
	6. The purpose of the survey was to demonstrate the levels of response, resources and priority given to doorstep crime by forces currently, their ability to measure levels of doorstep crime within their force areas, what training is provided to officers, and whether the force had any DSC offenders scored as OCGs.
	7. A **50%** response rate to the survey was achieved.
	8. There were a number of key findings from the survey responses, as follows:
		1. **14%** of forces stated they give high priority to doorstep crime, whilst **55%** of forces give medium priority and **32**% give low priority.
		2. When asked what stops doorstep crime receiving a higher priority, the following reasons were indicated:
2. Resources **72%**
3. Other higher priorities **78%**
4. DSC considered to be a low-priority area **11%**
5. Lack of awareness **33%**
6. Lack of training **17%**
7. Lack of necessary skills **17%**
8. Lack of understanding **22%**
9. Absence of a national reporting requirement **22%**
10. Low crime levels **17%**
	* 1. **62%** of forces stated they are currently unable to analyse and monitor levels of doorstep crime within their force areas. Only a third of forces had introduced a system to enable such monitoring, but many of them did not report any specific figures when asked because they said it would be too time-consuming.
		2. As a consequence of the above, forces are also unable to report on the number of investigations conducted in relation to doorstep crime for any given period, and the number of prosecutions of offenders for doorstep crime for any given period.
		3. In relation to the training of officers, the forces stated the following percentages of key staff do get specific training in relation to doorstep crime:
11. Operational Uniform Officers **62%**
12. PCSOs **60%**
13. Call centre/control room staff **53%**
14. CID officers **39%**
15. Economic crime unit / financial investigation unit staff **39%**
	* 1. **70%** of respondents agreed more training was needed.
		2. Only **9%** of respondents said their force has a specialist team to deal with doorstep crime incidents.
		3. **32%** of forces said they currently have OCGs scored in relation to doorstep crime.
		4. For the financial year of 2013/14, only two forces had referred any doorstep crime offenders for regional tasking.
		5. **32%** of respondents said their force did not investigate doorstep crime to the same standard as other crimes.
		6. The following responses were given to the question “Who is responsible for investigating DSC incidents in your force area?”:

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| Each division within the Force is responsible for investigating and allocating divisional staff to each crime. Previously when there was a large spate of doorstep crime with the same MO and offenders a Specialist crime team was set up to actively investigate this. |
| UNFORM OFFICERS/LOCAL CID OR TRADING STANDARDS INBEDDED OFFICER - DEPENDS ON THE OFFENCE |
| RESPONSE AND NPT STAFF ASSISTED BY CPO AND DOCO |
| Local investigation or CID depending on the particular incident |
| Whichever officer gets allocated the crime |
| Trading Standards (unless there is clear evidence of fraud) |
| Volume Crime Units generally. |
| Neighbourhood Policing Teams/Trading Standards |
| Likely as not the uniformed officer who attends the original report will investigate the crime. However where there appears to be a pattern or a more serious case, i.e. larger substantial loss, it may pass to Volume Crime to investigate. |
| Local police. |
| Neighbourhood policing teams |
| And officer available whether this is a PCSO or police officer |
| Response/LCT |
| Allocated to relevant area to deal. Regularly have to re-open incidents finalised as "civil matters or no offences" and get the job crimed. Once crimed, usually allocated to incident response/local neighbourhood team and generally eventually finalised as no further action. Rarely taken on by CID/more specialist officers. |
| Apart from the Bristol Doorstep Crime Team, which is being disbanded shortly, it is mainly uniformed officers or PCSOs, often in partnership with TS. |
| PCT & SNT's |
| Uniform/CID officers |
| Local Officers & CID |

* + 1. **100%** of respondents agreed doorstep crime is a police matter.
		2. **96%** of respondents said tackling doorstep crime in their areas could be improved.
		3. **86%** of respondents said the introduction of a specific crime recording code would improve their response to doorstep crime.
		4. **48%** of respondents said their response to vulnerable victims could be improved.
		5. **95%** of forces said their crime plan / PCC’s strategy included protecting the vulnerable.
		6. In relation to other offending carried out by doorstep criminals, the following crime types were identified:
1. Metal thefts **56%**
2. Distraction burglaries **94%**
3. Vehicle crime **50%**
4. Drug supply **31%**
5. Provision of false details by offenders **44%**
6. Driving without valid insurance **56%**
7. Drink and drug related offending **19%**
8. Trafficking/enforced labour **63%**
9. Benefit fraud **31%**
	* 1. **86%** of forces said they had not got any data to identify specific geographic areas of doorstep crime offending in their force areas.

**13.8a The project team recommends that the police survey results be made available to the Home Office lead for Policing and also the College of Policing.**

**13.8b The project team recommends that the figures regarding slavery / enforced labour also be shared with the Home Office lead for Modern Day Slavery.**

1. **Academic research:**
	1. Further to the recommendations of the project team in their report in March 2014 a criminologist was commissioned from the London School of Economics to undertake a research project into DSC offending.
	2. Four work streams were planned, as follows:
2. To conduct interviews with prisoners convicted of DSC offending.
3. To conduct interviews with released victims of slavery/forced labour who had been forced to carry out labour on DSC by travelling community OCG offenders.
4. To conduct in-depth interviews with repeat victims of DSC.
5. To carry out situational analysis in relation to DSC to identify prevention opportunities.
	1. **Prisoner interviews:**
		1. The project team have identified around thirty prisoners who are currently serving custodial sentences in relation to DSC offending. Checks have been made to establish their current prison locations and also their expected early release dates (ERDs).
		2. In June, July and August 2014 the criminologist carried out some preparatory interviews with officers at North Yorkshire Trading Standards who had conducted a number of criminal investigations into DSC OCGs, leading to successful prosecutions. She also spoke to officers at other LAs.
		3. In addition, a number of OCG case files were made available for examination to assist the criminologist in the preparation of an application to the National Offender Management Scheme (NOMS) at the Ministry of Justice for the prisoner interviews.
		4. The NOMS application was submitted in December 2014 and was finally approved in February 2015.
		5. In advance of the NOMS approval, the criminologist was able to conduct an interview with a released prisoner who had been convicted of DSC offending.
		6. The offender described the scale of offending in which he had been involved, stating that the police and trading standards did not know the true scale of DSC offending, and also that offenders made deliberate choices about where to offend, based on their assessment of areas in the country where they were less likely to be detected due to a poor law enforcement response.
		7. Letters have now been sent to the Governors of the prisons where the identified prisoners are located, to request contact with the prisoners to determine if they will be interviewed. A schedule will then be drawn up to progress the interviews from April 2015.
	2. **Slavery / forced labour interviews:**
		1. The criminologist was put in touch with a number of police officers in different forces who had acted as Officers in Charge (OIC) of slavery / forced labour investigations.
		2. Advice was sought from the OICs regarding the possibility of the criminologist being able to make contact with some of the victims of the investigations for the purposes of the project and interviews.
		3. Some of the issues with this area of work identified by the project team and the criminologist are that many of the victims remain very vulnerable despite their release from specific traveller OCGs. Many had dependencies on drink, drugs and gambling prior to be enslaved. Despite the efforts of the police, partner agencies and the voluntary sector, many of the victims had returned to their previous lifestyles and drink, drug and gambling abuse, some had returned to homelessness and could not be located, others had passed away or disappeared. Others have returned to work for the travelling community.
		4. Efforts are continuing to locate further individuals who are suitable for interview.
		5. One interview has already been conducted by the criminologist. The victim also described the scale of the offending being conducted by the OCGs. In addition, he talked about having had multiple contacts with trading standards and the police during DSC offending and that he had never been able to tell them that he was in fact a slavery victim or ask for assistance. The officers he had contact with had also not been aware that he was, in fact, a victim.
	3. The interviews with repeat victims of DSC and the situational analysis will be conducted when the two sets of interviews described above have been completed.
	4. When the above research has been concluded, an academic report will be published and this will be made available to the profession, to help inform their efforts to tackle DSC.
6. **The role of the Scambuster teams:**
	1. It is clear that the Scambuster teams have an important role in relation to tackling DSC, most importantly for providing a resource to investigate and prosecute those OCGs causing the most harm and detriment to vulnerable consumers.
	2. Despite this, the project team still believe there is currently a wide gulf between the enforcement and investigative work carried out at a local level by individual LAs, the intelligence work carried out by investigating officers, LILOs, RIAS and the NTSIT, and cases being at a sufficient level to justify a regional or national tasking referral. This is demonstrated by the Y & H regional trial outlined in Section 10. above, and also by the fact that 60% of LAs are allocating 10% or less of their budget and one or less FTEs to DSC work.
	3. Unless this gulf can be addressed, the ability for cases to be identified for tasking remains very limited and the profession currently relies on the 25% or less of LAs who do have the resources available to investigate and prosecute those OCGs causing the most harm. Many of these LAs do not refer cases to Scambuster teams for investigation as they already have sufficient resources to take on these cases, including in partnership with other agencies such as the police. Those LAs who do rely on the Scambuster team resource and regional and national tasking are less likely to have the resources available to develop cases to a level suitable for tasking.
	4. The options available for developing intelligence in relation to DSC OCGs and investigations are outlined in Section 10. above.

**15a The project team recommends that the NTG considers future tasking of the NTSIT, together with RIAs and LILOs, to assist with intelligence development to identify cases suitable for regional and national tasking for allocation to Scambuster teams.**

* 1. The project team remain concerned that, unless these recommendations are adopted, “Legitimate Guise” DSC offenders will remain the most visible to officers in LAs and to the RIAs and the NTSIT as a result of the large number of complaints made in relation to their activities. As such, they are also therefore more likely to be tasked to Scambuster teams currently.
	2. The Scambuster team are used to dealing with cases with high numbers of consumers who have suffered detriment as a result of offending. It must be accepted that some DSC OCGs will not generate high levels of complaints but, nevertheless, are suitable for regional and national tasking due to the harm caused to individual victims. This is illustrated in Section 10.8.20 above.

**15b The project team recommends that the NTG issues some guidance to the Scambuster teams to explain why those OCG investigations with lower levels of complaints still need to be tasked and actioned as a priority due to the level of harm caused to individual victims.**

* 1. The issues of low reporting and the associated lack of evidence of multiple DSC incidents / victims for some of the existing DSC OCGs is discussed in Section 10.9 above. The project team believe that one solution to this is the use of surveillance to identify further offending and victims. This has been used successfully on a number of DSC OCG investigations by NYTS and has led to guilty pleas to conspiracy to defraud and money laundering charges in every case.
	2. There is currently a lack of surveillance capability in the profession, including in the Scambuster teams.
	3. The likelihood of obtaining police assistance on surveillance operations in future is also mentioned in Section 10.9 above.

**15c The project team recommends that the NTG considers the options of funding a surveillance resource for those OCGS causing the most harm and detriment through DSC. This could be located within one Scambuster team. Or it could involve training some officers in each Scambuster team, who could conduct surveillance in any area depending on need. Alternatively, it could involve contracting with a company to carry out the surveillance on specific cases.**

* 1. The project team are also concerned about the ability of the Scambuster teams to respond to urgent safeguarding issues which result from the identification of OCGs targeting the elderly and vulnerable. Due to the size of the teams and their existing workloads of cases involving a variety of criminality, there are concerns about them being in a position to react immediately to the need for arrests, searches, interviews of offenders and victims. This is illustrated in 10.8.15 above.
	2. For this reason, the project team recommends that the NTG and NTG consider funding to provide a national team or regional teams, in line with the recommendation in 3.9b above.
1. **Good practice guidance for the trading standards profession:**
	1. The first set of materials are currently being finalised and will be issued to all LAs in the next few weeks.
	2. LAs are encouraged to add to the materials and to ensure they are kept up to date.
	3. The materials will be made available through the ACTSO website and also by email to those LAs who requested updates from the project team.
	4. The following good practice initiatives were mentioned by LAs in the national survey:

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| A range of target hardening materials has been produced which include posters which are displayed in publically accessible venues including a wide range of businesses. In addition a range of DSC folders containing a wide range of information has been produced for residents and are freely available. |
| Theatre group performances. Roadshows at banks, supermarkets etc. |
| WE HAVE CARRIED OUT PREVENATIVE WORK IN THE LAST TWELVE MONTHS. WE ISSUED AN ADVICE LEAFLET TO 6000 HOMES IN THE BOROUGH. OUR TOWN POPULATION IS 170K. THE LEAFLETS WERE DELIVERED TO TARGETED AREAS WHERE OLDER PEOPLE KNOWN TO BE LIVING. ALSO PRINTED OUT 250 OF THE GOOD NEIGHBOURS STOP ROGUE TRADERS LEAFLET AND CURRENTLY DISSEMINATING TO PUBLIC BUILDINGS/AREAS THROUGHOUT THE BOROUGH. |
| Mapping systems to identify DSC hotspots and where the vulnerable live. Police patrols - 24 per yr. Interventions Banking protocol |
| nominated neighbour bank staff training royal mail training police training social services training |
| Scams alerts are emailed to partners of the Lewisham Crimes Against Older Persons Working Group who cascade the warnings to residents they deal with. |
| Regular targeted patrols with police. IOM target in strategic assessment |
| Set to increase links with Children and Adult Services and establish route to informing the Safeguarding Adults Board. See last year’s Draft Tactical Plan to be sent ... To be reviewed, updated and implemented. |
| Linking up with Environmental Protection Officers in relation to waste transfer Close contact with materials suppliers |
| looking to train adult services staff to raise awareness and increase reporting |
| Even where limited information has been provided by the consumer the follow up action includes visits to the street concerned to see if any other victims are prepared to give information. |
| Leaflet areas following incidents Nominated neighbour scheme through volunteers Training for carers Distribution of materials through Adult Services Risk map with community safety based on age and vulnerability |
| We have 8 established NCCZ and close link with PCSO`s in all beat areas. A trading standards SPOC is provided for each beat area. |
| seeking funding to conduct training for carers both employed and family carers to check for signs of doorstep crime, scams victims and set up firm reporting and intelligence sharing between agencies and referral to adult safeguarding |
| Use the 'Old Protectors' befriending service |
| We are trying to recruit TS volunteers who can disseminate key messages to hard to reach groups in order to target harden and encourage greater reporting of incidents. |
| Proposed multi agency team. |
| CCCZ Neighbourhood Watch Road shows Drop in surgeries |
| No Rogue Trader Zones established in doorstep crime hotspots with further development as necessary; Inspections of No Rogue Trader Zones undertaken jointly with the Police; Monthly Intelligence Report produced and share with the Police; Training/awareness raising sessions run for various stakeholders; Membership of "Living Well Feeling Safe" Partnership |
| We do have a Doorstep Crime Reduction Group which consists of representatives of TS, Police, Neighbourhood Watch, Local Authority Wardens, Age Cymru, Fire Service and Ambulance. Other bodies are invited but rarely attend. The group has successfully put in bids to fund door stickers, advice booklets and No Cold Calling Zones. |
| We provide regular training to Derbyshire Police new recruits, CID officers and call handlers with respect to doorstep crime. |
| Working with Local Building Societies and also local branches for Banks such as NAT WEST to improve communication and awareness relating to issues around Doorstep Crime. This includes training to staff. Work has also been carried out also with the local Nationwide Building Society as well. |
| We have prepared and published "Say No to Doorstep Callers" sticker which has been widely publicised in Hartlepool |
| DSC is also part of a Safer City Strategic Plan to create a safer, stronger and healthier city by reducing crime, disorder, substance misuse and associated problems. The partnership puts forward money for NCCZs. Attending SAB following introduction of the Care Act |
| Each of our service offices have doorstep crime champions ready to deal with live incidents. We are in the partnership referred to above and part of our aforementioned SWERCOTS group too. Last November we joint hosted a regional scams conference which included the use of national Consumer Week info on doorstep crime and got local radio coverage which we believe did have an impact on consumer awareness of the issues. |
| No Cold Calling Zones in 3 hotspot areas which are reviewed annually by a consumer perception survey. review hotspot data to see if any emerging issues that could benefit from a No Cold Calling Zone |
| We currently have 13 No Cold Calling Zones. These zones cover over 1100 residential addresses in localities populated by a high proportion of elderly residents. |
| Havering Banking Protocol (now including post offices) Bogus Callers Working Group and Training Workshops Operation Scaffold (local version of Operation Liberal) Operation Liberal (yearly) Buy With Confidence Approved Trader Scheme Protected Zones with Superstickers for residents within the zones. Operation Lockdown, police ANPR checks on vans and commercial vehicles entering the Borough |
| Joint development of Cold Calling Control Zones. Proactive patrols with Police as necessary. |
| Establishment of No Rogue Trader Zones |
| Memocams, education campaigns/talks, op liberal |
| Mentioned above, we launched a "Safeguarding is everbody’s business" campaign in Dec 14, where we have re-badged existing engagement campaigns and materials. Eg we are presenting at every SNT Panel, we have contacted every NW co-ordinator to seek support in handing out leaflets, and we have sent packs of materials to churches, doctors surgeries, local community halls. We have also targeted local high street businesses such as charity shops, hairdressers, pharmacies and supermarkets to encourage them to display posters and cards - this was a direct result of data drawn down from the national project which indicated older people. More recently we have agreed partnership working with local police around the courier scam, with joint discussions with senior local bank representatives. |
| Participating in developing a regional strategy with key partners |
| We respond to any reports of doorstep crime, particularly we have a dedicated rapid response facility which is operational 24/7. We have an officer who specialises in doorstep crime and an additional officer who is a specialist in Community Liaison. We have a community of Watchdogs who act as the eyes and ears of their community. We communicate with out watchdogs and their networks using a series of alerts |
| Doorstep Crime Theatre Show PCSOS deliver leaflets for us in previously-targeted areas Training to Lancs Constabulary Immediate Response Teams |
| Attendance at appropriate events e.g. "Love Your Home" event in Worcester |
| Super No Cold Calling Zone Truecall programme National Scams Hub interventions Keep Safe Packs with C.A.B. and Age UK |
| Just over a year ago we launched a joint Hampshire and Isle of Wight Doorstep Crime Task Force involving Hampshire Constabulary, Portsmouth, Southampton, the Isle of Wight and Hampshire Trading Standards. The purpose being to share intelligence and identify the most prolific offenders with a view to working together to bring them to justice. |
| Currently using remote monitoring cameras and covert memo cameras with our most vulnerable residents to avoid repeat victimisation. |
| Lanarkshire Doorstep Crime Group (as previously referred to). Police Scotland Lanarkshire Division also has a bespoke unit called Operation Doric, the work of which is dedicated to the targeting and reporting for prosecution of doorstep crime offenders in Lanarkshire. |
| The main success that has increased the reporting and the referrals to Trading Standards is the now long standing, informal partnership working with Police Safer Neighbourhood teams. The main contact to maintain is with the area Sergeants with whom we have regular contact. This knowledge of TS role has since spread to Police response teams. We do not believe value can be added by specific Police training because the Officers move around so much and in reality all the Police actually want to know is who to call when they identify trade offences. The two SNT Sergeants have regular meetings and contacts with response teams and their Inspectors and relay our messages. We find this has been the most effective transfer of information and knowledge. This method has worked with our smaller authority but hasn't proved as successful in a neighbouring larger authority. |

**16a The project team recommends that the NTG give consideration to allocating funding to issuing further good practice guidance and managing and updating the existing guidance.**

* 1. The project team was also asked to produce a training DVD for the profession.
	2. If the NTG still wish to see the training DVD completed, one option would be to allocate some additional budget to complete the script-writing and filming and production of the DVD in 2015/16.

**16b The project team recommends that the NTG give consideration to allocating funding in 2015/16 to completing the production of the training DVD.**

1. **Trader survey:**
	1. In September 2014 the project team devised a short survey for members of the legitimate trade sector engaged in property repairs. The purpose of the survey was to obtain evidence of the fact that legitimate traders do not cold call and have no need to do so. The evidence was to be made available to BIS, to support efforts to introduce a ban on cold-calling.
	2. The survey was sent to a sample of traders in North Yorkshire, to Trustmark members, the National Federation of Master Builders and the National Federation of Roofing Contractors.
	3. There was, unfortunately, a very low response rate to the survey.
	4. However, of those traders who did reply, **80%** said they never cold call at doors, or by phone, or drop flyers through letterboxes. Only **4%** said they ever cold call in person and **2%** by phone.
	5. **67%** of traders said they obtained new business through recommendations / word of mouth, **14%** through newspaper and local advertiser publications, **8%** through trusted trader websites, **6%** through directories such as the Yellow Pages and **4%** through their own websites.
	6. **78%** of traders said cold-calling in person should be banned, **45%** said it takes trade away from legitimate business, **39%** said it causes reputational damage to their trade sector and **59%** said it causes harm to vulnerable householders.
	7. **94%** said they did not think enough was currently being done to tackle doorstep crime. When asked what else they would like to see happen **19%** wanted a registration scheme for legitimate traders, **56%** wanted a ban on cold-calling and **14%** wanted to see more enforcement by trading standards and the police.

**17a The project team recommends that further attempts be made to secure a higher response rate to a trader survey, to provide supporting evidence regarding a ban on cold-calling. This evidence should then be made available to BIS, following the May 2015 election.**

1. **Householder surveys:**
	1. The national survey results show there has been a fall in the number of LAs seeking resident’s views regarding DSC, from 43% to **30%**. Those who are seeking their views are still primarily doing so only in relation to No Cold Call Zone set ups and reviews.
	2. The merits of seeking wider resident’s views are to assist LAs when they are considering their priorities and what work areas / activities to allocate resources to. There is very strong public support for undertaking work to tackle DSC. It also provides evidence of reporting rates within a LA’s area and of the fact that residents do not want cold-callers at their properties, which supports a ban on cold-calling.
	3. One option for completing a wider survey of residents is to utilise LA Citizen’s Panels. Good practice guidance will be issued by the project team in relation to such surveys.
	4. An alternative would be for individual regions to fund householder surveys within their areas. This was carried out by the Y & H region in 2011 and cost approximately £10,000.
	5. Another alternative would be for the NTG, NTS and TSI to fund a national survey of householders, similar to that carried out in 2002.

**18a The project team recommends that the NTG considers the option of making funding available to the regions to conduct a national householder survey. The evidence from such a survey can then be used to support a ban on cold-calling.**

1. **Conclusions:**
	1. To assess the value of the work carried out by the DSC project team to date, the national survey included a question for LAs about whether they felt the project team had added value.
	2. **91%** of LAs stated they felt the DSC project team had added value.
	3. The following comments were also made by LAs in the national survey:

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| Highlighted possibilities of what can be done to prevent/address doorstep crime and protect/support victims. Before the survey we didn't identify types of victims or highlight geographical areas of concern |
| Yes it has added value re doorstep crime work re profession .Larger authorities are best placed to give Doorstep crime full priority. Small authorities with very limited resources would be unable to implement all the initiatives. |
| Has highlighted that we could do more and a need to improve work with the CSPs, particularly in sharing data / intel. |
| The survey has given us lots of new ideas and we will be reviewing our DSC service |
| Great to give it some national profile Needs a national approach |
| It highlights that this is a subject that requires an organised programme of activities aimed at prevention whilst maintaining an enforcement capacity when incidents occur |
| It has helped to collate all of the information and give a national picture on the situation. It has also helped to really raise the profiles and the issues. The statistics and findings have been very useful. Hopefully once made available the toolkit will really help to support us in developing this work further forward. |
| The project has raised national awareness of the nature and volume of incidents, this can only help to reduce the incidents and the effectiveness of their practices. |
| The feedback from the surveys from other authorities is interesting and useful. We have seen comments about whether things like "no cold callers" door stickers actually attract rogue traders to the vulnerable but we find that whole streets full of stickers have a strong effect. The information about victim profiling is also useful for using Mosaic in prevention and awareness work. |
| The way forward is a regionally based team, as most incidents are cross boundary and smaller authorities don't have the resource to effectively deal with door step crime. |
| Also this survey contains some very useful ideas which we may introduce if we have the resources after the restructure in April 15. |
| We used the North Yorkshire "safeguarding is everybody’s business" poster as the basis for our borough wide campaign. We also reviewed our safeguarding procedures internally, resulting in a one stop referral agreement with the local Age UK Bromley Advice and Information Network. We made use of the national data from the victim impact survey to report to local councillors; we explored predictive mapping and as a result have identified mapping software we didn’t know we had and started to make use of it; we attended the DC day in Stratford Upon Avon and picked up some ideas around safeguarding protocols as used by Hampshire. We are looking forward to any best practice training/toolkit for front line investigators. |
| The project has been fantastic - a testament to the dedication and skill of those involved. As someone from a proactive borough I can't thank you enough for giving us new ideas and support. Hopefully its raised the profile within the profession and on a much wider basis as to the essential nature of this type of work - and caused enough shame and guilt in those authorities who have failed hitherto to acknowledge that doorstep crime referrals do not arrive neatly packaged but will only start to come in once the profile and the nature of the crime has been raised enough for people to understand that it is a crime and that it does occur - albeit often silently. Thanks to you all for your dedication – it’s much appreciated. |
| We'd like to see more focussed co-ordination in national approaches to tackling doorstep rogue trading |
| It provides a lot of data but does also give ideas of areas where proactive work could be undertaken subject to resources. |
| After attending the DSC conference in April last year this has inspired a change in the way that we look at DSC. Work is now ongoing to assess reports over the past years, analysis of this data and hopefully a mapping exercise to inform the work that we do in the next few years to enable a proper strategy to be put in place, as previously this has never been done before. This is the push that was needed to refocus and ensure that we are helping out residents who really need this case, as I am passionate about DSC and its effects on victims. I hope this will mean we can move things forward, supporting those who are victims in the best way possible and try and prevent these crimes happening in the first place with the right action. |
| It has certainly given our authority lots to consider and I am sure a pathway to much better practice. However, resource limitations mean that only a small amount of activity can be undertaken. Activity on doorstep crime will never be handled efficiently unless it is managed day to day on a regional/national level. |
| Yes -best practice etc. |
| It’s made us think what we may not be doing and what we could do better. |
| We are currently looking at mapping incidents and introducing better coding on our Flare system to record incidents. We are going to use the SARA and the Problem Analysis Triangle to look at issues relating to DSC to see how we can reduce incidents or better protect victims. |
| Currently working towards implementing some areas of work indicated on this survey. The results of this work should reflect in next years' survey. 'Buy with Confidence' post created for an officer to set up an approved trader scheme.  |

* 1. The project team hope that many of the issues identified within this report, for example the lack of evidence regarding reporting levels for DSC, the lack of performance measures in relation to crime reduction, increased reporting and safeguarding of victims, and the lack of evidence regarding resident’s views in relation to DSC will be partially addressed by the good practice guidance being issued to the profession.
	2. It is also hoped that the good practice guidance will assist LAs in their investigations and prosecutions of DSC offenders and that this will make some contribution to increasing prosecution figures. There has been a significant demand for good practice guidance and comments in the survey response regarding the need for it.
	3. However, the project team have serious concerns regarding the levels of resource currently being allocated by LAs to tackle DSC and how effective the collective response of the profession can be in dealing with the scale of the problem and the offenders. This reflects the findings of the team in the March 2014 report, although additional data is now available as a result of the introduction of new questions in the national survey in 2015.
	4. This additional data raises questions about the effectiveness of the trading standards service in tackling DSC when 60% of LAs are able to allocate less than one FTE within their area to deal with DSC offending, intelligence and prevention.
	5. The project team believe that the current financial situation and proposed spending cuts for the period 2015-18 are having a serious detrimental impact on the ability of the profession to adequately deal with DSC. This is also reflected in the police response. This can only be addressed by the provision of national funding to improve the resources currently available.
	6. The project team still believe that the most appropriate solution is the provision of resources for a national team or regional team to develop intelligence and investigate and prosecute DSC offending, in a similar manner to the funding currently provided to tackle Illegal Money Lending.
	7. It is believed this would result in significant increases in the number of offenders prosecuted and made the subject of Proceeds of Crime Act confiscation orders enabling compensation payments to be made to victims. This would also result in higher detection rates and associated deterrent effects on offenders and potential offenders.
	8. The following comments were made by LAs in the national survey:

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| --- |
| The way forward is a regionally based team, as most incidents are cross boundary and smaller authorities don't have the resource to effectively deal with door step crime. |
| We'd like to see more focussed co-ordination in national approaches to tackling doorstep rogue trading |
| In the three years prior to the service review our authority had made positive advances in tackling doorstep crime in a more proactive way. As a result we found complaint levels were increasing and we were getting better intelligence and enforcement, as well as better working relationships with partners. Since the service review this good work has reduced significantly and it is unlikely with current resources we will manage to rebuild the momentum we were establishing prior to the review. |
| Staffing reduced by 50% in 4 years. Likely more to come. |
| All our preventative measures are currently under threat from proposed cuts in the budget restructure. |
| There should be a National Task Force made up of relevant parties to tackle these major issues that often involve nasty, unscrupulous individuals. |

* 1. It is recognised that there is a reluctance on the part of the NTG and NTS to create any more national enforcement teams. However, the project team believe that the existing resources within Scambuster teams are inadequate to allow significant improvements in the investigation and prosecution of offenders, primarily as a result of all the other areas they are required to cover.
	2. Until there is a more widespread and effective enforcement response, the project team believe DSC offenders will continue to offend throughout the country, going largely undetected and defrauding the elderly and vulnerable, exploiting the advantages available to them by crossing LA and force borders.
	3. In recognition of the fact that it is highly unlikely further resources will be made available for a national or regional resource, recommendations have been made within this report to introduce some improvements in the way that offending and offenders, specifically OCGs, are identified for tasking purposes.
	4. An alternative approach would be for regions to create their own DSC teams, with officers from each LA, providing the ability to investigate regional offending and to ensure uniformity of investigations in all LAs in the region. Such a team would also require some management oversight and it is recognised that very few LAs have sufficient resources to release officers to regional teams, specifically management resources.
	5. Recommendations are also made in relation to improving data collection and the collation of evidence, to support services locally to tackle DSC and maintain resources.
	6. The ageing population is increasing the opportunities of all fraudsters, including DSC offenders, to prey upon the most vulnerable in society. As a consumer protection service, the trading standards profession needs to ensure they are robust in dealing with offenders and also in safeguarding victims.
1. **Recommendations:**

**3.9a The project team recommends that recognition is given to the fact that the financial constraints facing LAs has created, and is maintaining, a lack of uniformity in enforcement and a postcode lottery for victims of DSC, and that this is acknowledged and considered further by the NTG and NTS, in conjunction with the comments in 14.3.6.**

**3.9b The project team specifically recommends that the NTG and NTS give full consideration to the option of funding a national team or regional teams to investigate DSC offending and carry out enforcement and intelligence development work, and that such a resource needs to be over and above the resource currently provided by the Scambuster teams.**

**3.13a The project team recommends that the NTG continues with the annual national survey as a means of measuring performance for tackling doorstep crime.**

**6.1a The project team recommends that the findings of the national survey and of this report are shared with the Minister for Consumer Affairs, after the May 2015 election, to highlight the current restrictions on LAs to effectively deal with tackling DSC, most notably in relation to enforcement and prosecutions.**

**6.2a The project team recommends that the findings of this project report and the survey of police forces are shared with the Home Office minister with responsibility for policing, after the May 2015 election.**

**6.2b The project team recommends that contact be made with the College of Policing to discuss the possibility of providing content for training materials of police officers. This could be solely in relation to DSC, or could be provided in relation to other forms of financial abuse of vulnerable adults, for example scam mail. It could fit with any existing safeguarding training that is provided to officers.**

**6.2c The project team recommends that the findings of this report by shared with the Modern Day Slavery team at the Home Office and that this work should commence following the completion of interviews with victims of slavery / forced labour and the publication of the associated academic research report.**

**6.3a The project team recommends that the NTSST engages with Health Education England to create training materials for delivery to the health sector regarding DSC, scams and the financial abuse of vulnerable adults.**

**6.3b The project team recommends that contact is made with the Department of Work and Pensions Later Life Engagement Team and the Health and Policing Lead in the Safeguarding and Vulnerable Adults Unit at the Home Office, to explore the options for joint-working.**

**6.4a The project team recommends that contact is made with the appropriate Minister of the new government, following the May 2015, election to present the findings of this report and to make representations regarding the nature and extent of DSC and other financial abuse of vulnerable adults, and the need to co-ordinate the work of various departments in protecting vulnerable adults from financial abuse. This could include a recommendation that a Task Force or Strategic Board of relevant departments and agencies be established to look at co-ordinating efforts to tackle financial abuse of vulnerable adults.**

**6.4b The project team recommends that the NTG / NTS petition the Government and provide evidence to support arguments to establish a Minister for Older People and an Older Person’s Commissioner, following the May 2015 election.**

**7.4a The project team recommends that LAs review their protocols with the CACS to ensure they are able to meet the minimum response levels detailed in the protocol and to ensure they are meeting the urgent safeguarding response needs of vulnerable adults who are at risk when these are reported to them by the CACS.**

**7.4b The project team recommends that periodically LAs provide feedback to the CACS advice line staff regarding successful DSC prosecutions and interventions which have directly resulted from a CACS referral.**

**7.7 The project team recommends that further training be provided to the CACS advice line staff by the NTS e-Crime Team and the NTSST.**

**8.13a The project team recommends that the NTG / NTS commission academic research to examine the cost savings to LAs which can be achieved effectively safeguarding vulnerable adults from DSC and other forms of financial abuse. Funding could be sought from the Department of Health for such research.**

**9.4a The project team recommends that LAs consider using the Victim Impact survey, including surveys conducted as revisits, as a measure of their performance in safeguarding interventions and also improving the well-being and independence of victims.** **This will also assist in demonstrating the cost-savings of effective safeguarding interventions.**

**10.8a The project team recommends that the Y & H regional trial template be replicated and applied in other regions.**

**10.8b The project team recommends that consideration should be given to adapting the way in which the RIAs and LILOs currently undertake analysis of DSC incidents.**

**10.8c The project team recommends that the NTG give consideration to allocating additional resources to the RIAs, to provide an intelligence development capability in relation to regional DSC offending.**

**10.9a The project team recommends that receipt of the NCA data cuts by the NTSIT needs to continue beyond 1/4/15, including thorough analysis of the data at the end of each quarter.**

**10.9b The project team recommends that one designated officer at the NTSIT should be responsible for the analysis of the NCA data cut, intelligence requests to relevant partners and production of problem profiles.**

**10.9c The project team recommends that the designated officer at the NTSIT should also be responsible for intelligence analysis in relation to the receipt of new 5x5x5 forms at the NTSIT on Memex and IDB regarding DSC.**

**10.10a The project team recommends that the designated officer at the NTSIT should send the top OCG intelligence requirement out to RIAs on a two-monthly basis, to identify new OCGs causing harm and detriment through DSC. The intelligence received should then be further developed.**

**10.10b The project team recommends that the RIAs should conduct some intelligence analysis on a monthly basis to identify DSC offenders currently causing harm to vulnerable consumers within their regions and should liaise with other RIAs and the NTSIT regarding cross-regional offenders.**

**10.11a The project team recommends that the monthly intelligence reports currently received by the project team from the NFIB be continued and received and analysed by a designated officer at the NTSIT.**

**10.11b The project team recommends that intelligence requests to NFIB form an integral part of enquiries made by officers in LAs and by RIAs and Scambuster teams, to improve the intelligence picture in relation to DSC.**

**10.11c The project team recommends that the NTSIT be tasked with conducting further research into the emerging threat of DSC offenders posing as police and trading standards officers, with a view to identifying OCGs involved in the offending who can then be put through the tasking process.**

 **this area with a view to identifying OCGs involved in the offending who can then be put through the tasking process.**

**11a The project team recommend that the NTG encourages the NTSST and the NTS e-Crime Team to engage with the third sector advice lines and deliver training regarding scams and e-crime.**

**12.5a The project team recommends that LAs wishing to engage with the financial sector locally, or to provide national evidence which can be used for lobbying purposes, should record details of how many victims of DSC incidents in their area were taken to financial institutions to make withdrawals by offenders and also how many of the DSC reports made to them were made by a financial institution directly, and that this data be collated nationally.**

**13.8a The project team recommends that the police survey results be made available to the Home Office lead for Policing and also the College of Policing.**

**13.8b The project team also recommends that the figures regarding slavery / enforced labour from the police force survey also be shared with the Home Office lead for Modern Day Slavery.**

**15a The project team recommends that the NTG considers future tasking of the NTSIT, together with RIAs and LILOs, to assist with intelligence development to identify cases suitable for regional and national tasking for allocation to Scambuster teams.**

**15b The project team recommends that the NTG issues some guidance to the Scambuster teams to explain why those OCG investigations with lower levels of complaints still need to be tasked and actioned as a priority due to the level of harm caused to individual victims.**

**15c The project team recommends that the NTG considers the options of funding a surveillance resource for those OCGS causing the most harm and detriment through DSC. This could be located within one Scambuster team, or it could involve training some officers in each Scambuster team, who could conduct surveillance in any area, depending on need. Alternatively, it could involve contracting with a private company to carry out the surveillance on specific cases.**

**16a The project team recommends that the NTG give consideration to allocating funding to the issuing of further good practice guidance and managing and updating the existing guidance.**

**16b The project team recommends that the NTG give consideration to allocating funding in 2015/16 to completing the production of the training DVD for officers.**

**17a The project team recommends that further attempts be made to secure a higher response rate to a trader survey, to provide supporting evidence regarding a ban on cold-calling. This evidence should then be made available to BIS, following the May 2015 election.**

**18a The project team recommends that the NTG considers the option of making funding available to the regions to conduct a householder survey and that the evidence is used to support a ban on cold-calling.**

**The project team would like to thank the NTG for the opportunity to undertake this project over the last 18 months.**

**We would also like to thank all those authorities, agencies, third sector and trade sector partners who have worked with the project team and provided support, including in the completion of surveys issued by the team.**