



**APPENDIX 1**

**ECONOMIC CRIME PROTOCOL**

**FOR THE CITY OF LONDON**

# INDEX

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## 1.0 Introduction

There is a wide range of economic crime perpetuated against victims and this document outlines the types of scams, and the approach that will be taken in the City of London to tackle this issue.

### 1.1 Economic Crime

Economic Crime is a far-reaching term covering many types of fraudulent activity. However, in this report, the Office of Fair Trading definition is used:

“A misleading or deceptive business practice where you receive an unsolicited or uninvited contact (for example, email, letter or advertisement) and false promises are made to con you out of money”

Individuals who fall victim to Mass Marketing frauds lose a staggering £3.5 billion each year.

A further £168 million is lost by the 2.6 million people who fall victim to online ticket fraud each year.

### 1.2 The Victims

We are all potential victims of economic crime; half the adult population is targeted every year.

However, an OFT study found that about 20% of the adult population were particularly vulnerable to scams.

The socially isolated were found to be less able to regulate emotions relating to scams and therefore this led them to being more vulnerable.

Good decision-makers who often have successful business or professional careers were another group identified as having above average vulnerability to mass marketing fraud. These people become victims because they generalise success in one area of their life to the gambling context. This group is unlikely to report the crime, feeling embarrassed and wishing to keep the matter private.

### 1.3 The Protocol's Objectives

The protocol has identified the following objectives for resolving economic crime in the City of London:

**Working with partner organisations, to deal with economic crime in the most effective way.**

**Awareness** – needs to be increased in order that members of the public and specifically groups identified as being particularly vulnerable to scams can protect themselves.

**Disruption** of the fraud network focussing on the web, telephony and finance.

**Enforcement** against the perpetrators. Enforcement action can take many forms from undertakings, injunctions, cautions to prosecution.

**Support for Victims.** Whilst it is unlikely that victims will be able to get their money back, victims can need support in stopping the scam and avoiding being victims in future.

## **1.4 Working With Partner Organisations**

It is essential to collaborate with all the partners so as to provide a comprehensive system that will not only fight the crimes, but also provide support for the victims and create a greater awareness among the public at large.

The key partners in fighting economic crime in the City of London are:

- City of London Police Economic Crime Department
- National Lead Force,
- National Fraud Intelligence Bureau
- Trading Standards Service, City of London Corporation
- London Trading Standards Association (LOTSAs) –the co-ordinating organisation for Standards in London
- Financial Services Authority
- Insolvency Service, Company Investigations Bureau

It is essential to involve partner organisations that are in a position to increase public awareness of the types of scams that are prevalent and encourage victims to come forward. These are:

- Safer City Partnership
- City of London Police – community policing
- City of London Trading Standards
- City of London Adult Social Care

Partners able to offer assistance and support to victims are:

- City Advice
- Victim Support

Whilst all scams have the hallmarks of being mass marketed deceptive business practices making false promises to con people out of money, each scam also has its own idiosyncrasies.

Therefore the precise mix of partnership expertise will vary depending on the scam.

Mass Marketed Fraud is always evolving with new schemes appearing every few months.

Intelligence must be shared amongst the Enforcement partners who can then cascade the information to the Support Partners.

The Financial Services Authority has set up a "Landbanking and Economic Crime Group" which meets every two months to discuss the latest Mass Marketed Frauds. It is attended by representatives from:

Financial Services Authority  
National Fraud Intelligence Bureau  
Insolvency Service Corporate Complaints  
City of London Trading Standards

By sharing intelligence each organisation is has access to the best possible intelligence.

Early warning of new scams allows alerts to be issued in the hope and with the expectation that it will reduce the numbers of victims of the fraud.

By using existing networks, such as the Safer City Partnership, Adult Social Care, City Advice and TS Interlink, and developing new networks such as Facebook, the information can reach a wide section of the community.

## **2.0 Working Together**

### **2.1 Trading Standards Service of the Markets and Consumer Protection Department working with the National Fraud Intelligence Bureau.**

The police and trading standards have been working together to develop a more collaborative approach for dealing with economic crime.

A service level agreement has been drafted which sets out the process for crime referral, see Appendix 1.

In addition, telephone and email details have been provided to Trading Standards to enable direct contact to be made with the officers currently nominated for this role officers within the City of London Police.

This will streamline the contact process and overcome the difficulties Trading Standards previously had in not knowing who could be contacted to discuss matters of fraud that were being investigated by Trading Standards.

For the most urgent cases, where immediate action is required, contact telephone numbers have been provided to enable Trading Standards Officers to speak to the National Fraud Desk Duty Detective Inspector who will make the decision as to the level of police resources that can be made available and when.

For all other matters, referrals will be made, usually by email, to the National Fraud Desk and copied to DI Amanda Lowe. The email should be marked City of London Trading Standards.

Normally a decision will be given by the police within 1 month, however, if there is a need for a decision within a week, this should be made clear on the referral form and the matter will be prioritised.

The referral will be made on a form known as a 5x5x5 (see Appendix 2) and will give a detailed, clear summary of the alleged offences, involvement of other partner enforcement agencies, expectations, timescales and degree of urgency.

The case will be assessed by a Detective Inspector. The information will be further assessed using the Economic Crime Directorate Enquiry Matrix which will determine whether the case may be taken on by the National Lead Force. In borderline cases, the Detective Superintendent will consider the individual matter.

If the matter is not considered to be a police crime, a Detective Constable will advise Trading Standards of the decision and provide a written explanation of the rationale behind the decision.

If the information is believed by the DI to be a police crime the case will be recorded on Action Fraud, the national crime reporting database.

The Detective Inspector will decide whether the matter is suitable for investigation by:

National Lead Force  
The City of London Police, or  
Another police force

This decision will be ratified by the Quality Assurance Board.

The National Fraud Desk will be responsible for transferring the matter to the relevant police service.

The Detective Inspector will be responsible for advising Trading Standards which operational team in which jurisdiction has been passed the matter.

The investigating team will be responsible for providing feedback to Trading Standards.

## **2.2 Intelligence Sharing**

It was agreed in principle that on some occasions, intelligence sharing would be useful to enable Trading Standards take the lead on a case, but supported by police intelligence.

However, an Information Sharing Agreement would have to be in place, detailing what information could be shared and for what purposes, among other things.

## **2.3 Joint Operations**

Following the initial assessment of a Trading Standards referral to the National Fraud Desk, it may be appropriate to conduct a joint investigation. At the beginning of the investigation, clear parameters will be set detailing the specific responsibilities of each of the parties. The case will be reviewed periodically to ensure that resources and the investigation are being handled efficiently.

## **2.4 Alerts**

In appropriate cases, joint alerts could be put out warning consumers of matters of concern.

## **3.0 Trading Standards working with the Financial Service Authority**

The Financial Services Authority has four key objectives which are:

- maintaining market confidence
- securing the appropriate degree of protection for consumers
- fighting financial crime
- contributing to the protection and enhancement of the stability of the UK financial system.

The Financial Services Authority (FSA) can take action against breaches of the Financial Services and Markets Act (FSMA) 2000. However, the FSA is not a general fraud prosecutor, so if, for example, it becomes aware of a



landbanking business selling land that does not exist, or a carbon-credit firm selling non-existent carbon credits, then the FSA would pass the matter to the Police or Serious Fraud Office, depending on the scale of the perceived fraud. A referral to the appropriate organisation would be made, irrespective of potential breaches of FSMA, as the fraud would be the greater wrongdoing.

The FSA regulate collective investment schemes (CIS) of which Landbanking is an example and certain types of exchange contracts (often called 'futures'), such as Carbon Credits and a firm must be authorised by the FSA to promote or operate these activities in the UK

If Trading Standards receive a Landbanking complaint or query, contact should be made with the FSA and advice sought from them as to whether or not the scheme falls within the definition of a Collective Investment Scheme.

If Trading Standards become aware of other types of investment fraud such as boiler room schemes, the matter should initially be passed to the FSA for investigation. The FSA should let Trading Standards know the realistic time-frame for making a decision as to whether a formal investigation will take place.

#### **4.0 Trading Standards working with the Insolvency Service Corporate Complaints**

The Insolvency Service Corporate Complaints section have the power to seek a Winding Up Order against a company on the ground that it is in the public interest and can also apply to Court for a disqualification order against an individual director.

Section 449 of the Companies Act 1985 effectively prohibits the flow of information from the Insolvency Service during an investigation, even to other enforcement agencies.

This will inhibit the concept of working together, but nonetheless, a referral to the Insolvency Service Corporate Complaints team can be very effective in removing rogue directors and the rogue companies they run from the consumer landscape.

#### **5.0 All Four Agencies Working Together**

A meeting is held every two months with a representative of the National Fraud Intelligence Bureau, Trading Standards, Financial Services Authority and the Insolvency Service to discuss the fraud types which are most active, to share information and discuss the most effective means of combating them.

#### **6.0 Types of Common Mass Marketed Frauds and the Lead Enforcement Team.**

For each type of fraud, the nature of the activity is described below, and the lead organisation for tackling it has been identified.

## **6.1 Carbon Credits**

This is the latest scam. A carbon credit is a certificate which represents the right to emit one tonne of carbon dioxide. These certificates can be traded for money.

There are two types of carbon credits, Voluntary Emission Reductions (VER) which involve the offset or reduction in carbon in any way, such as solar panels, and Certified Emission Reductions (CER).

UK consumers are being targeted to invest in VERs.

Governments and large companies trade in these CER credits, but is unlikely they would be offered to consumers in small volumes.

VER's, being voluntary involve a wide range of bodies and quality standards. If the company selling the VERs is not authorised by the FSA, the consumer will not have access to the Financial Ombudsman Scheme or the Financial Services Compensation Scheme.

## **6.2 Lead Enforcement Team - FSA**

If the Carbon credit scheme is being run as a Collective Investment Scheme or a Futures contract, then these will be regulated by the FSA, and that body would be the Lead Enforcement Authority. That said, the FSA have found that most carbon-credit schemes that have come to the attention of the FSA are neither collective investments schemes or traded as futures, and since carbon credit trading is not a regulated product under the FSMA in the same way that shares are, fall outside the remit of FSMA and hence the FSA.

The FSA is, however, concerned about the way the schemes are being promoted to consumers and their viability as an investment.

If the carbon credit scheme is not a collective invest scheme nor traded as a future, the matter should be passed to Trading Standards for investigation under the Consumer Protection from Unfair Trading Regulations.

The Insolvency Service Corporate Complaints service should be contacted, if a company registered in England and Wales is involved.

Trading Standards should contact Safer City Partnership with a view to publicising the scam and warning people to be extra- vigilant.

## **7.1 Boiler Room Share Fraud**

Consumers receive a cold call (although newspaper, magazine and emailed adverts can also be used) offering shares in worthless or non-existent companies. Huge returns are promised but invariably fail to materialise.

The companies are rarely authorised by the FSA and therefore the consumer does not have access to the Financial Ombudsman Service or the Financial Services Compensation Scheme.

## **7.2 Lead Enforcement Agency – FSA/Police**

The Lead Enforcement Agency will be the FSA or the police.

If Trading Standards receive the initial complaint, the matter should be referred to the FSA and an Action Fraud report made.

Corporate Complaints at the Insolvency Service should be contacted if the company is registered in England and Wales.

## **8.1 Advance Fee Fraud (419's)**

An email is received telling of a hard luck story where the sender is entitled to a large fortune, but he needs a kind individual to provide funds to enable him to get what is rightfully his. The large fortune will then be shared with the person who helped him.

This type of fraud got the name 419 as it refers to the article of the Nigerian Criminal Code dealing with fraud.

## **8.2 Lead Enforcement Team - Police**

The Police will be the lead enforcement team and therefore details should be sent to the National Fraud Desk.

The Insolvency Service Corporate Complaints service should be contacted, if a company registered in England and Wales is involved

Trading Standards, where advised, should ensure that complainant alerts their bank and is signposted to civil advice at either City Advice (City residents) or Consumer Direct.

If the victim is an elderly vulnerable resident of the City, Trading Standards will notify Adult Social Care of the existence of the scam being operated. The victim should be asked if they would like their details passed to Adult Social Care, for additional support.

If the victim lives in the Barbican, put a notification on Barbican Talk.

### **9.1 Lottery/Prize Draw Fraud**

The victim is contacted by email or letter and told that s/he has won a large amount of money on a (frequently international) lottery, or prize draw, all that is needed is an admin fee.

There may also be a premium rate phone number to ring.

There is no prize, it is only a matter of how much money is lost and whether the bank account details are given enabling the account to be emptied.

### **9.2 Lead Enforcement Agency**

If victim is a City resident put them in touch with City Advice. Trading Standards should contact a City Advice manager and advise that victims of the scam may be seeking advice.

Contact the Insolvency Service Corporate Complaints, if a company registered in England and Wales is involved  
Contact Safer City Partnership with a view to publicising the scam and warning people to be extra- vigilant.

### **10.1 Modelling Agency Fraud**

Advertisements are placed for new models. Applicants are then asked to supply a portfolio of photographs for forwarding to clients. The naïve models inevitably do not have a portfolio and this is then arranged by the agency. It costs upwards of £400. The model may even be persuaded into department lessons and other skills which all have to be paid for in advance.

The modelling jobs, which were going to provide the income to cover the costs do not materialise.

### **10.2 Lead Enforcement Team**

Contact Trading Standards which will be the lead enforcement team.

The Insolvency Service Corporate Complaints service should be contacted if a company registered in England and Wales is involved.

Trading Standards should ensure that the consumer has access to consumer advice either through City Advice, if they live in the City, or Consumer Direct, for those living elsewhere.

## **11.1 Wine Investment Fraud**

The consumer is cold-called and offered the opportunity to invest in fine wine while it is still in the barrel and the price is low, it will then be stored in a bonded warehouse then bottled and sold for a high price.

Once again, fabulous brochures are sent to the consumer with a great deal of information about how the Chinese demand for wine has gone through the roof pushing prices up.

The victim pays the money and then waits for a couple of years for the wine to be ready for bottling and the fraud to be discovered.

## **11.2 Lead Enforcement Team**

The Police will be the lead enforcement team and the National Fraud Desk should be contacted.

The Insolvency Service Corporate Complaints should be contacted, if a company registered in England and Wales is involved.

Trading Standards should contact the Safer City Partnership to arrange for publicity.

## **12.1 Ticketing Fraud**

A website is set up offering tickets for popular events which have a high scarcity value.

Payment is taken for the tickets but they are not delivered.

When the date of the event approaches and consumers still have not received their tickets, they might be told to go to the event and they will be handed over there. This seldom happens.

Sometimes tickets are delivered, but entry is refused to the event as the tickets are counterfeit.

## **12.2 Lead Enforcement Team**

Contact National Fraud Desk as the Police will be the lead enforcement team. DI James Clancy has specialist knowledge of this type of fraud and it might be prudent to ensure that he is aware of the matter.

The Insolvency Service Corporate Complaints service should be contacted, if a company registered in England and Wales is involved.

Safer City Partnership should be contacted to arrange for publicity.

### **13.1 Landbanking**

Consumers are contacted by phone post or email and are told of large profits that can be realised by investing in land which has been carefully chosen as being likely to get residential planning permission, whereupon the value of the land will soar and each investor will make a substantial profit.

The brochures that are sent out look highly professional and include lots of reassuring information from government sources, the BBC and similar organisations stating how millions of new homes will have to be built and planning restrictions relaxed to allow this.

In reality, the land has no chance of being granted planning permission for residential use and the consumer's money will be locked into worthless land.

These schemes are often collective investment schemes which are regulated by the Financial Services Authority.

### **13.2 Lead Enforcement Team**

The Financial Services Authority, will be the lead enforcement team. The FSA are empowered to investigate the scheme to see if it is an unregulated collective investment scheme.

If the landbanking scheme is not a collective investment scheme then it will not fall within the remit of the FSA and the matter will be passed to the police or trading standards.

The National Fraud Desk should be contacted and complete an Action Fraud referral.

The Insolvency Service Corporate Complaints service should be contacted, if a company registered in England and Wales is involved.

### **14.1 Miracle Health/Slimming Cures**

Consumers receive an email, letter or see a pop-up web advert directing the consumer to a website advertising miracle health cures or slimming pills, usually endorsed by fake testimonials of satisfied customers.

There is a 'free' trial for a small amount to cover postage, payable by credit card, which is then used to take money every month from the card, sometimes the product is delivered, sometimes not.

It is extremely difficult to cancel, as false phone numbers and addresses are commonly given.

## **14.2 Lead Enforcement Team**

The National Fraud Desk will be the lead enforcement team. Although this may be a case for a joint operation between the Police and Trading Standards.

When advised, Trading Standards will put an alert on TS Interlink, so that all trading standards services across the country will be aware that the matter is being investigated.

Advise the consumer to contact City Advice/Consumer Direct for advice on getting their money back.

Trading Standards will contact Safer City Partnership with a view to publicising the scam.

## **15.1 Pyramid Selling Schemes (Ponzi schemes)**

This purports to offer an investment scheme that investors are required to buy into and recruit others. The investment product is either worthless or even non-existent.

Initially, it appears profitable, as the investment capital of the new recruits is used to provide the illusion of profit being paid to established investors.

In fact, most of the money goes to the person at the top of the pyramid who then disappears.

## **15.2 Lead Enforcement Team**

The lead enforcement team will be the Financial Services Authority who have the power to deal with these unlawful schemes.

The Insolvency Service Corporate Complaints service should be contacted, if a company registered in England and Wales is involved.

## **16.1 Mobility Device Fraud**

This fraud targets the elderly and persuades them to spend substantial sums of money on mobility aids such as scooters and stair lifts at highly inflated prices, compared to the same item on the high street.

Unlawful selling techniques are used, such as pretending to be from social services and not leaving the house until a contract is signed.

## **16.2 Lead Enforcement Team**

The lead enforcement team will be Trading Standards, who have the power to deal with the unlawful selling techniques.

The Insolvency Service Corporate Complaints service should be contacted, if a company registered in England and Wales is involved.

Advise the consumer to contact City Advice if they live in the City or Consumer Advice.

Trading Standards will advise the Adult Social Care team so that they are aware of the practice.

These include:

- whether it meets the urgency criteria that would trigger an immediate response by fraud squad officers.
- whether it should be reported to the National Fraud Desk with the likelihood that it would be the subject of a police investigation.
- whether disruption of the operation by police officers would be the most effective action.
- whether a joint operation of the Economic Crime Department and Trading Standards should be embarked upon with the areas of responsibility clearly defined.

## **17.0 Raising awareness of economic crime**

Raising public awareness to minimise individuals becoming victims of economic crime is essential.

The protocol seeks to:



## 17.1 Highlight the Psychology of Scams.

The Office of Fair Trading (OFT) has carried out extensive research into the psychology<sup>1</sup> and impact of scams.<sup>2</sup> From these works it is apparent that the scams:

- Are customised to fit the profile of the people being targeted
- Have an authoritative approach, which induces a sense of trust  
Include visceral triggers that provoke intuitive reactions and reduce the motivation of people to process the content of the scam message deeply
- Include error inducing processes such as:
  - scarcity clues (make your claim by/offer closes...)
  - behavioural commitment (ring this number...)
  - disproportionate size of alleged reward to the cost of trying to obtain it (Claim a £250k just by ringing a number/invest £10000 at see your investment rocket...)
- individualise the approach using the name of the individual frequently, or using apparently handwritten notes, to make the recipient feel specially chosen
- offer reward for victims who have very high motivation ( relief from pain, weight loss and money)
- showing a liking for the victim, making it difficult for the victim to withdraw from the scam
- giving small gifts as a sign of the trustworthiness of the fraudster

There is a scam for everyone. The research has shown that men and women are equally liable to become victims.

Women are more susceptible to miracle health and clairvoyant scams.

Men tend to become victims of high risk investments schemes and property investment.

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<sup>1</sup> The Psychology of Scams. Provoking and Committing errors of Judgment. Prepared for the Office of Fair Trading by the University of Exeter School of Psychology

Successful people are at risk of becoming victims of fraud because they generalise success in one area of their life to the gambling context.

Therefore there is no such thing as a person immune to a scam. We are all potentially victims and therefore should not feel embarrassed if we become a victim.

Victims tend to:

- Have a better than average knowledge of the scam content
- Focus on the apparent honesty of the scammers rather than analysing what they were being told.
- Have low motivation to process the information thoroughly so specific attributes that help distinguish scam messages from legitimate marketing offers were disregarded.
- In some cases, respond to replace a negative mood with a hopeful one.
- Less able to resist and regulate emotions associated with scam offers.

Socially isolated victims may be more vulnerable because they lack the social networks that induce us to regulate our emotions when otherwise we might not.

Successful, financially-secure people can be vulnerable to scams because of an over-confidence in their ability to spot scams, which in turn is exploited by the fraudsters.

## **17.2 Encourage Victims to Come Forward and Register a Complaint.**

Fewer than 5% of victims report the scam.

The OFT studies found that victims tended to keep the decision to respond private. This may indicate that at some level they do not want to have the fraud exposed for fear of ridicule, shame and guilt.

Highlighting the psychology used by the fraudsters rather than the errors of judgment of the victims, will hopefully allow a greater number of those who have been defrauded to come forward

### 17.3 Provide Non-threatening Means of Reporting the Fraud

#### a) Speaking at Community Forums.

Regular slots at Resident Association Meetings, the Older Persons Forum for a variety of speakers from City of London Police, Trading Standards and Safer City Partnership to highlight the psychology of scam and explain that victims are only responding in a very human way to the devious manipulations of the fraudsters. Focus could be given to one particular fraud and the component parts revealed.

Those wanting to speak privately could do so at the end.

#### b) Posters up in places where people go

GP surgeries were identified as a place that the most people go to. The visit inevitably involves sitting and waiting. A simple poster with web addresses and phone numbers of Consumer Direct and Action Fraud would be read by a large cross section of the population.

Community Halls, Benefit Offices, Post Offices and workplaces are other areas that should be targeted.

#### c) Facebook and Twitter

Setting a community Facebook page so that scams can be reported and advice sought.

Simple information about how scams work, what the latest scams are and a link to Action Fraud and Consumer Direct would provide access to help, not only to those who are regular users but also may alert friends and family of victims to the situation.

Using the Twitter facility to send out messages about current scams.

#### d) City of London website

An ideal place to provide up-to-date information to all users of the website and Corporation staff.

#### e) Articles in press, newspapers, radio and television

By working closely with our other partners, press coverage can be maximised.

#### f) Information on community websites such as Barbican Talk

This is a valuable resource that has the potential to reach the affluent high-achievers who have profiled as a group to be vulnerable to high-risk investment and property fraud.

## 17.4 Disruptive Activity

Some fraud is best dealt with by the police using disruptive activity. This disrupts the criminal activity by seeking the removal of web, telephony and financial facilities from that criminal activity. It is often the case that the providers are unaware that their services are being used to enable or facilitate a crime and are willing to remove those facilities when they are made aware of police/TS concerns.

Disruptive activity is of particular benefit where a fraudster is merely using an address in the City of London but is not actually there, as it is clear that a legitimate business is not being run.

This is an area where Trading Standards would be interested in receiving training from the police as some of the methods that the police use could be transferred to cases being investigated by Trading Standards. To this end, one week secondments are being arranged for Trading Standards Officers to spend time with the City of London police

### Enforcement Powers

<b>Enforcement Partner</b>	<b>Prosecution</b>	<b>Injunctions</b>	<b>Undertakings</b>	<b>Other</b>
Police	Fine and up to 10 years imprisonment			Disruptive Activity
Trading Standards	Fine and or up to 2 years imprisonment.	Available where trader has breach of an undertaking given under the Enterprise Act	Trader undertakes to stop a particular type of practice	Disruptive Activity
FSA	Fine and or up to 2 years imprisonment	Available and worldwide freezing of assets	Not to engage in new business until FSA satisfied no further breaches	Unwinding contract and effect restitution for consumer
Insolvency Service	N/a	N/a	N/a	Disqualification of Directors. Winding up of company.

## 17.5 Signpost Victims to Advice and Support

City Advice is a confidential advice service run by Toynbee Hall and funded by City of London Corporation to provide free advice to residents and businesses located in the City.

It holds drop-in outreach sessions throughout the City and also offers telephone advice.

Consumer Direct is a government-funded service offering telephone and online advice to consumers.

Victim Support is a national charity giving free and confidential advice to help victims of crime.

## Appendix 1

Service Level Agreement  
Between  
City of London Police  
and  
City of London Corporation Trading Standards Service

**Crime referral processes**  
**Service Level Agreement CoLP – City Trading Standards**

1. Trading Standards will make an initial assessment of a consumer complaint/enquiry and evaluate whether the matter would be more appropriately dealt with by Trading Standards or if the matter warrants consideration by the police.
2. The Trading Standards Officer should record the crime on Action Fraud and obtain a NFRC Reference Number, which should be cited on the referral report below.
3. Trading Standards should refer potential fraud crimes to the City of London Police National Fraud Desk for consideration of investigation by the Economic Crime Directorate in the following format:
  - a. A clear summary of the alleged offence, dates, times, suspects, locations, losses etc
  - b. Details of referral to any other agency and actions taken
  - c. Expectations regarding the referral
  - d. Any timescales for initial response (1 week if urgent, otherwise 1 month). Urgent cases would include those where a vulnerable victim has sustained a personal loss.
  - e. Any degree of urgency in relation to loss or harm or vulnerability of the victim.The information should be sent using a 5x5x5 (copy attached)
4. In exceptional cases, where immediate action would be sought, the Trading Standards Officer will contact the duty Detective Inspector by telephone (020 7 601 2222) and discuss the action plan. Should the need to refer a matter arise out of hours, a specific message should be left stating that Trading Standards have a serious fraud issue that they need to discuss with the duty Detective Inspector who will then call the Trading Standards Officer back.
5. The referral should be emailed to [nlf@cityoflondon.pnn.police.uk](mailto:nlf@cityoflondon.pnn.police.uk)
6. The NFD will assess the matter in line with the requirements detailed by the referring TS officer.
7. The matter will be prioritised in line with current demand and priority of the assessment.
8. Once assessed the NFD DI will recommend whether the matter is suitable for
  - NLF investigation or
  - Referral to the City Police or
  - Referral to another police service for investigation.
9. Where the matter is deemed suitable for investigation by the National Lead Force or by the City of London police, then a Handover meeting will be arranged. The strategy for dealing with the complaint will be agreed. This will include the amount of information, if any, that may be given to the consumer. Any media statements by Trading Standards on such cases must be agreed with the police before release.
10. If the matter is to be transferred to another police service due to jurisdictional issues the NFD will facilitate this.
11. Trading Standards will be notified of the outcome within one week or month of the initial referral,

12. If the matter is declined for investigation by the NLF then TS will be provided with the rationale behind those decisions and notified if another agency is considering the matter.
13. The consumer will be informed of the body responsible for progressing the case, as soon as practicable, with the previous consent of the police officer leading the investigation.
14. The investigating team will provide feedback to TS during the investigation, when appropriate. At the end of the investigation, there will be a structured de-brief.

### **Intelligence sharing**

1. An information sharing agreement would be required between City TS and the CoLP to enable information sharing. This relates to restricted and confidential data (**not GPMS**), however generally information would be sanitised prior to sharing with non police bodies, dependant on the data and the purpose for sharing.
2. TS can apply for information from the NFIB, however information shared will be subject to the ISA. Each submission will be considered on its individual merits.
3. The CoLP welcomes information from City TS, this should be sent to the NFD at the email address noted above who will assess the information and record as appropriate and take whatever action is required.

### **Joint operations**

1. Joint operations will be undertaken with TS following the assessment process detailed above. Clear parameters for each parties involvement will be defined at the commencement of the investigation and reviewed periodically.

## Appendix 2

### Example of a 5x5x5 Intelligence Report

<b>Report</b>				
<b>LOGGING ONLY/RESPONSE REQUIRED</b>				
Unique ref No./ Authority / Date of incident				
Contact for further information				
Contact details				
Overall evaluation in SIH format				
Trading names				
Names of individuals				
Addresses and phone numbers				
Vehicle registration numbers				
Any unique identifying information				
Enter Incident details below (Incident location, descriptions inc ethnic group codes, criminal / civil breaches make/model/markings of vehicles including any partial reg no. etc.) <b>H&amp;S Risk</b> - Include here any indication of violence, intimidation or aggression by the trader				
<b>Source Evaluation</b>				
<b>A</b> Always reliable	<b>B</b> Mostly reliable	<b>C</b> Sometimes reliable	<b>D</b> Unreliable	<b>E</b> Untested source

#### **Intelligence Evaluation**

<b>1</b> Known to be true without reservation	<b>2</b> Known personally to source but not to officer	<b>3</b> Not personally known to source but corroborated	<b>4</b> Cannot be judged	<b>5</b> Suspected to be false or malicious
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#### **Handling Code** (to be completed at time of entry onto an intelligence system and reviewed on dissemination)

<b>1</b> May be disseminated to other law enforcement and prosecuting agencies, including law enforcement agencies within the EEA, and EU compatible (no special conditions).	<b>2</b> May be disseminated to UK non prosecuting parties (authorisation and records needed)	<b>3</b> May be disseminated to non EEA law enforcement agencies (special conditions apply)	<b>4</b> May be disseminated within the originating agency only	<b>5</b> No further dissemination: refer to the originator. Special handling requirements imposed by the officer who authorised collection
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