

# **Scotland's Scams Prevention, Awareness & Enforcement Strategy 2021-24**

**March 2021**

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## Ministerial Foreword



Scamming is a criminal offence – it is a form of fraud. We must tackle scams in the same way that we do any other type of criminal activity, with the full power of the relevant enforcement bodies and through a wider process of public education, resilience building and stakeholder coordination.

Given the economic uncertainty we now face in light of the current global pandemic, and the increased vulnerable circumstances that many people are finding themselves in, it is essential that we tackle this issue head on.

We know that scams can impact anyone, and the cost that they can inflict is enormous. It is clear that scams – and the fraudulent criminal activity that they represent – can also have severe financial consequences for the economy as a whole, as well as the individuals who are personally impacted.

But as we're all too aware, for individuals the harm created by scammers is not only reflected in a bank balance – there is significant, and equally concerning personal consequences to being scammed. People can experience emotional harm, ranging from stress and anxiety to anger and embarrassment.

What this means is that the overall cost to Scotland of scams is not only economic, but also social. In the current climate of Covid-19 recovery efforts, effectively addressing scams can contribute towards the longer-term growth of a sustainable wellbeing economy.

This new Scams Prevention, Awareness & Enforcement Strategy will facilitate a more coordinated approach to tackling scams in Scotland, and deliver improved outcomes for a diverse range of people through the introduction of a new strategic framework focused on three pillars:

- (1) Prevention and Disruption;**
- (2) Awareness and Education; and**
- (3) Enforcement.**

At the heart of this strategy are the needs of those individuals either at risk of, or who have been impacted by scams in Scotland. The actions presented here will move us towards a “whole person, whole system” support model in Scotland for those victimised by scammers.

People should not be made to feel ashamed, or helpless. They must have a clear understanding of who to go to when they need help, and be able to report scams quickly and receive appropriate feedback on how action has been taken in response. And they must be able to readily and effectively access advice and support to meet all their needs.

This can provide closure for the individual, but can also help build confidence and trust in communities that their rights and their interests are being protected.

We must also enable people to take control when they do become exposed to this criminal activity. This strategy focuses on steps that we can take to build individual – and in turn, community level – resilience against falling victim to a scam. Education and awareness raising of the

risks posed by scammers – their modus operandi and tell-tale signs – can enable people to spot scams and avoid them in the first place.

We need to embed scams literacy into wider society, through drawing on the reach, trust and legitimacy of education providers, including schools and training provided at work. Knowledge is power.

On this basis, meaningful, complementary and year-round messaging and campaign activities aimed at the general public will further be promoted. Scammers are not constrained by borders or time zones, and will always look to take advantage of new government announcements, or product and service launches. This means that prevention messaging must be as fleet of foot, and continuous.

There is also a role for digital technology and innovation in key sectors, such as telecommunications and banking. Where prevention can be integrated into processes, we can reduce the onus on the individual to be their own first line of defence.

We also need to make sure we're using what are increasingly becoming limited resources to best effect across the wider prevention landscape – we need to collaborate, and be strategic in our investments so we are not duplicating efforts.

That is why underpinning all of the actions that are set out in this strategy is a recognition of the importance of positive partnership working, collaboration and coordination of interventions – all the way from local trading standards and community networks, to national level representative groups for industry, regulators and other key enforcement bodies and advice service providers.

The actions we will take under this strategy will set us on the right course to agree a more consistent means of measuring and monitoring the scale and depth of scams activities in Scotland. We will work with partners to take a more proactive approach to addressing new and emerging trends in the methods and intent of scammers, through the effective sharing of scams data and intelligence across the public, private and third sector. And we will look for new opportunities to strengthen the wider advice, support and enforcement landscape, making it easier for individuals to navigate – we must reduce complexity and confusion.

I don't underestimate the challenge we face in achieving this. There is no silver bullet or single solution. I'm sorry to say that it is unlikely we will ever be able to completely eradicate scams or their impacts in Scotland.

I am, however, fully committed to doing all we can as a government, working in partnership with the wider advice and regulatory landscape to make life harder for scammers, and improve the lot of those targeted by scams.

We must make it as hard as possible to perpetrate this crime in Scotland; and we must ensure support is accessible for those people who lose out as a result of this disgraceful activity.

The actions set out in this strategy represent a framework for working across Scotland to deliver our **vision to establish Scotland as an inhospitable environment for scammers to operate and exploit people, where people feel safe against the risk posed by scams and can readily access effective support to meet their needs.**

By setting the right course, and continuing to work closely with the many organisations – from local to national level

– who are already tackling scammers on the frontline, and supporting those at risk or who have been victimised, we will meet these aims. Scams have no place in a Fairer Scotland, and we will do all we can as a government to combat them for the betterment of individuals, families and communities.



**Jamie Hepburn**  
**Minister for Business, Fair Work & Skills**

## Tackling Scams in Scotland: A Shared Framework, Vision and Outcomes

Figure 1 presents an overview of the new strategic framework that we are introducing to tackle scams in Scotland, and how we see this approach supporting delivery of a broader vision and national outcomes over time.

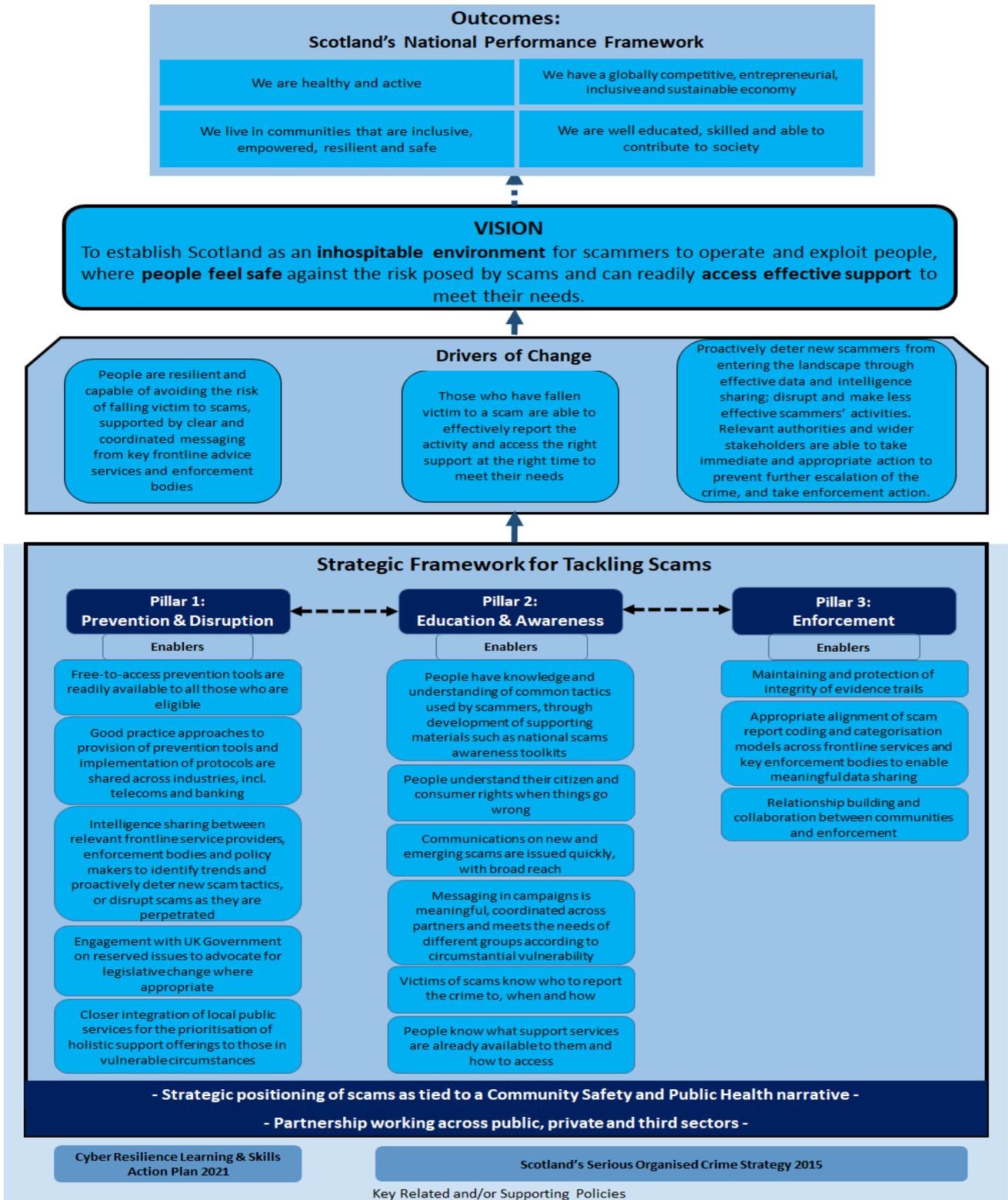


Figure 1: Realising our vision, delivering outcomes - a strategic framework for tackling scams in Scotland, as linked to wider drivers of change and contribution to outcomes under the National Performance Framework.

Summary of Strategic Objectives & Actions, 2021-24

Below is a summary of key strategic objectives and actions that we will take to implement this framework in practice. This strategy sets out why this work is important, the gaps we seek to address within the current scams prevention landscape and how these actions – as structured by the new framework – will help us strengthen our collective approach.

<b>Strategic Framework Pillar: Cross Cutting</b>	
<b>Objective</b>	Support greater stakeholder coordination and collaboration
<b>Action</b>	1. Establish a formal “Scottish Scams Prevention Partnership”
<b>Objective</b>	Elevate the voice – and needs – of people in scams prevention work
	Support capacity and resilience building amongst people to reduce the risk posed by scams and their impacts
	Increase the evidence base concerning the scale and nature of harm caused by scams in Scotland
<b>Action</b>	2. Deliver a programme of public engagement across Scotland
<b>Objective</b>	Build a more integrated strategic policy approach to tackling scams in Scotland
<b>Action</b>	3. Establish a Scottish Government Policy Reference Group
	4. Map related national policies and programmes
<b>Strategic Framework Pillar (1): Prevention &amp; Disruption</b>	
<b>Objective</b>	Support industry sharing of good practice approaches to scams prevention
	Encourage greater investment in appropriate technological innovations for practical interventions

<b>Action</b>	5. Conduct reviews, or deep dives, across key sectors
<b>Strategic Framework Pillar (2) Education &amp; Awareness</b>	
<b>Objective</b>	Support greater stakeholder coordination and collaboration
	Support capacity and resilience building amongst members of the public to reduce the risk posed by scams and their impacts
<b>Action</b>	6. Put in place supporting communications infrastructure for the new “Scottish Scams Prevention Partnership”
	7. Support the Partnership to create an Anti-Scams Strategic Communications Plan, and calendar of events
	8. Develop a Strategic Education Action Plan
<b>Strategic Framework Pillar (3) Enforcement</b>	
<b>Objective</b>	Streamline the “user journey” for reporting scams and accessing advice and support in Scotland
<b>Action</b>	9. Establish a Streamlining the Landscape Steering Group led by enforcement bodies, to conduct an options appraisal
<b>Monitoring</b>	
<b>Objective</b>	Promote a more holistic scams data and intelligence picture in Scotland to track impact of interventions and better enable the targeting of investments on what works
<b>Action</b>	10. Develop an appropriate and robust approach to monitoring trends in scams and measuring the impact of further actions arising from delivery of strategic Objectives and any agreed next steps

**Table 1:** A summary of the key objectives and associated actions that will be taken forwards in line with implementation of the new strategic framework for tackling scams in Scotland, 2021-24

## Introduction

Following the conclusions of the Scottish Nuisance Calls Commission, in September 2017 we published an action plan in which we committed to the longer term ambition to develop a scams prevention strategy<sup>1</sup>. This was in recognition of the Commission's assessment that nuisance calls are often a part of a more complex and harmful scam activity.

To inform next steps, we undertook initial baseline work to better understand the extent of the issue that scams pose in Scotland. This included an evaluation of the effectiveness of actions to reduce harm caused by nuisance calls, published in March 2018<sup>2</sup>.

On 13 June 2019, the First Minister then announced the Scottish Government's plan to publish a new Scams Prevention Strategy.

A new Scams Prevention Partnership Group was formed, and a set of suggested ideas were identified for further consideration as part of the development of the strategy:

- **to explore the value of a central point for people in Scotland to report scams, and receive feedback, advice and support** – cited as part of this included benefits in terms of streamlining the user journey, and optimising intelligence to inform further prevention and intervention work;
- **set up a data group to assess current data and intelligence** and

how it can be used to prevent scams; and

- **develop a more coordinated approach to scams awareness and education**, including: exploring a centralised calendar of campaigns; and a framework that supports both national and local priorities.

In September 2020, the Minister for Business, Fair Work & Skills announced the establishment of a newly focused and streamlined **Scams Prevention Strategy Partnership & Advisory Group**<sup>3</sup>, comprised of 14 members and two observer organisations. The group was specifically tasked with developing robust advice to help steer the strategic direction of travel for scams prevention work that would be reflected in the strategy, building on the initial outputs of the previous partnership group.

The focus and actions within this strategy have been developed on the basis of the work of the Advisory Group – and sub-working groups – as well as additional discussions with central advice and enforcement bodies on an ad hoc basis. As such, we are confident that the work set out here represents a fair reflection of wider stakeholder concerns and advice regarding how best to tackle scams in Scotland.

This strategy sets a **direction of travel** for further collaboration with partners throughout Scotland to combat scams, and develop a “whole person, whole system” approach to support and enforcement provision. Tackling scams effectively – and consistently meeting the diverse needs of those impacted – is a

<sup>1</sup> See <https://www.gov.scot/publications/response-scotlands-nuisance-calls-commission-action-plan/>

<sup>2</sup> <https://www.gov.scot/publications/effectiveness-actions-reduce-harm-nuisance-calls-scotland/pages/1/>

<sup>3</sup> <https://www.gov.scot/groups/scams-prevention-strategy-partnership-and-advisory-group/>

long term objective that will take commitment and determination. The actions set out here represent just the first steps in this journey.

In the following chapters, we will outline:

- (1) What we mean when we talk about “scams” and why they are an important issue in Scotland to address;
- (2) The good work that is already underway by partners and the Scottish Government to address some of the challenges presented by scams;
- (3) Gaps in the existing approach and what is needed to strengthen our collective approach;
- (4) What new work we are in the process of taking forwards, or will develop over the coming months with partners in order to address these gaps through the introduction of a new strategic framework; and
- (5) How we will oversee delivery.

## Chapter 1: Scams and the Importance of Tackling Them

### What are scams?

Defining what is meant by a “scam” is difficult. There is no legal definition within Scots law. People can also interpret the term differently, associate it with different events or impacts, or may have a preconceived notion of what a scam ‘looks like’ in practice. An example of this is provided in **Box 1**. All these factors can inform an individual’s behavioural response, as well as what type of enforcement action is taken and by who.

Scams can transform, evolve from one tactic to another and become more prolific or targeted once a victim responds.

While the definition of a scam may vary, and scams link closely to other criminal activities, there is one key common factor that underpins all types of scams.

**At its simplest, scams are a form of fraud. They represent criminal activity.**

To inform this strategy, preliminary work was carried out in partnership with advice

and enforcement bodies in Scotland during 2019, and the following definition was agreed:

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“A scam is a fraud or attempted fraud performed by a deceptive individual, group or company in an attempt to obtain data, money or something else of value.”

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This will form the basis for on-going partnership working, although we recognise that this definition may be refined further.

For an overview of some of the most common types of scams perpetrated against people, see [Scams Prevention Strategy Partnership and Advisory Group](#)

[Why is it important to tackle scams, and why now?](#)

There are three aspects of scams that mean that tackling them in Scotland must be a priority for government.

#### **Box 1: Perception vs. Reality – when is a scam not a scam?**

##### **Case Study: Refund for Cancelled Holiday**

Mr Smith contacted [consumeradvice.scot](#) – a service funded by the Scottish Government and delivered by Advice Direct Scotland – after receiving a demand for a payment of £1,846 from a company in Ireland called ‘Intrum’ that he believed to be a scam.

“I was sent an email saying I owed money. We booked a holiday with EasyJet that was cancelled. We asked the bank for money back for apartment we booked in Croatia. The bank got the money back for us.”

He advised that the accommodation had been booked separately, and as such he may be in breach of contract with the accommodation provider for cancelling the contract and getting the money back. He was referred on to the Association of British Travel Agents for further information, as the accommodation provider were a member.

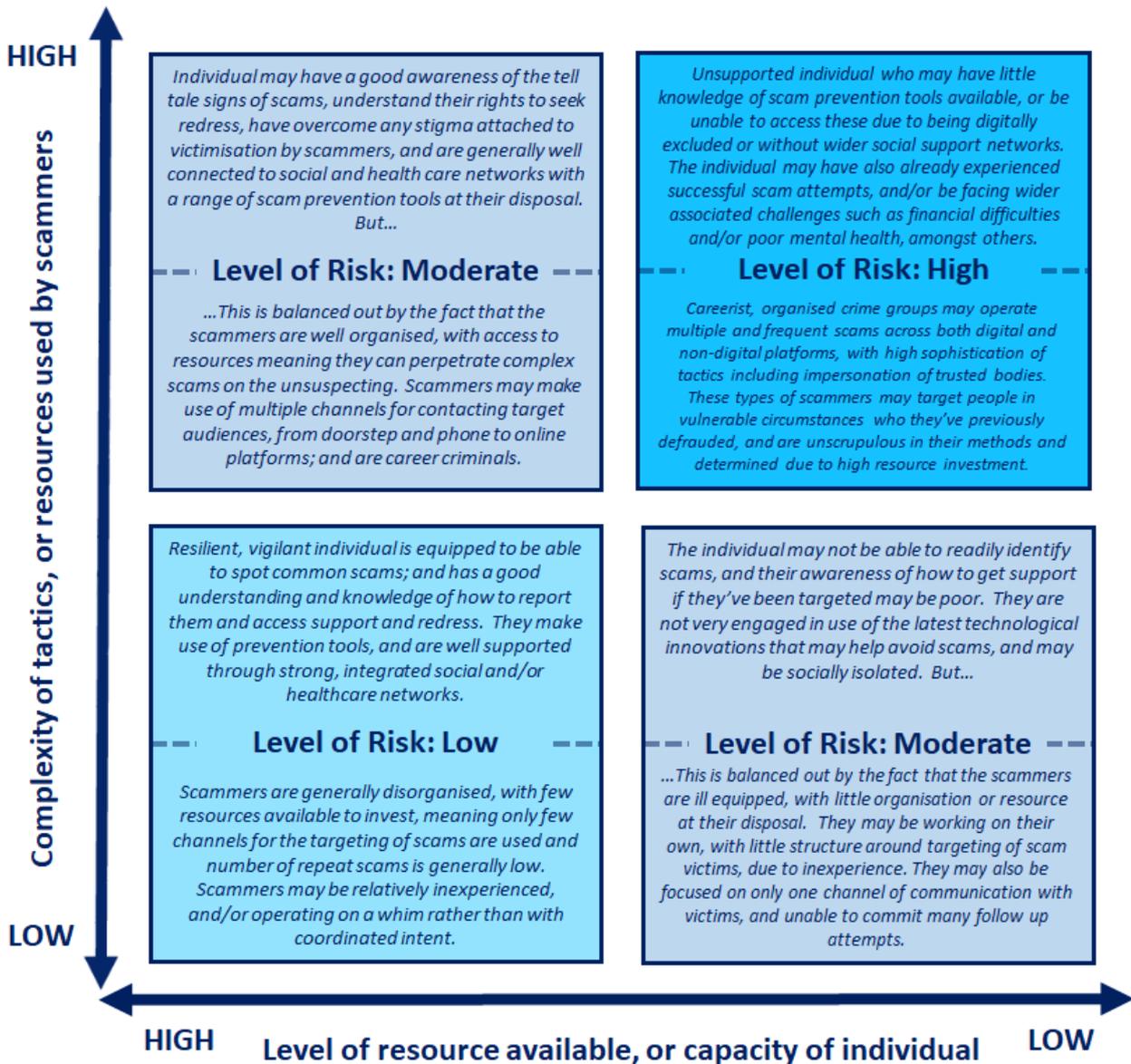
Although in the end it would appear that this was not a ‘scam’, the consumer had categorised it as such when reaching out to [www.consumeradvice.scot](#) .

**(1) Everyone is at risk of being targeted by scammers, and some are at greater risk than others.**

Scams do not discriminate, and so present a significant challenge to society. According to Citizens Advice Scotland (CAS), "Some estimates suggest that half the population are hit by attempted scams

every year, many of them more than once."<sup>4</sup> In this way, we all exist on a spectrum of vulnerability to scams – some people are therefore at more risk than others, and require greater support.

**Figure 2** shows some ways in which someone may become more, or less at risk of being scammed, according to both



**Figure 2:** A spectrum of vulnerability to scams. The examples of circumstance provided in each quadrant are provided for illustrative purposes only, and do not seek to represent an exhaustive list of ways in which any one individual may experience scams or their impacts in practice. More research is required in order to fully understand susceptibility to scams by circumstance.

<sup>4</sup> <https://www.cas.org.uk/news/now-more-ever-we-all-need-be-savvy-about-scams>

the tactics employed by the perpetrators and the resources or circumstances of the individual who is exposed to the scam. However, it has been recognised by some that there is a current absence of research, for example, related to the susceptibility of different individuals to online scams<sup>5</sup>. For this reason, the descriptions provided are presented for illustrative purposes only, in order to reflect some of the commonly discussed ways in which frontline service providers and enforcement bodies currently look to support people and reduce their level of risk of being scammed.

The main point is that no one is immune from the risk that scammers pose, and scams are not constrained by geographic, demographic or socio-economic boundaries. This means tackling scams requires a multi-pronged and national level approach.

**(2) The impacts that scams can have on people are wide ranging and can lead to longer term issues for those targeted.**

The cost to our economy of scams is clear. In March 2018, EKOS produced their 'Preventative Spend Research' report into the financial cost of scams to the Scottish economy, commissioned by the Scottish Government<sup>6</sup>. In this report it was noted that the Annual Fraud Indicator Report 2017 showed a cost to the UK of £190 billion across all sectors, of which around £7 billion related specifically to individuals. The challenge acknowledged by EKOS is that there are difficulties in establishing the true cost of scams to the Scottish economy. Most significantly,

perhaps, is the fact that there is a current lack of disaggregated data across devolved administrations within the UK. Another is the fact that many scams go unreported by victims, meaning the true cost of scams is hard to quantify accurately. What can be said, though, is that from a financial perspective the issue is not to be underestimated.

However, the impact that scams can have on people is as much a social and health one, as it is an economic one, having an emotional and psychological impact on the person involved.

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"It's been really traumatic. [...] It breaks you as a human being and leaves you scared of the outside world. It's still hard to trust yourself and others [...] and it takes a long time to not feel like an idiot. There's a lot of shame and despair which hasn't gone away and I'm still awaiting closure to this day."

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The above quote is from an anonymous social media scam victim from October 2019; and is cited by Which?<sup>7</sup>, as an example of the serious implications that scams can create for people, beyond financial or data loss of some form.

A report published by the Communications Consumer Panel<sup>8</sup> in 2020 found that survey respondents to their research use words such as "traumatised, embarrassed, humiliated, angry and devastated" to describe the emotional impact of being scammed<sup>9</sup>.

Those individuals who already suffer from poor mental health can be at particular

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<sup>5</sup> See <https://www.sciencedirect.com/science/article/pii/S0747563217301504>

<sup>6</sup> See [Preventative Spend Research 2018](#)

<sup>7</sup> <https://conversation.which.co.uk/scams/online-scams-emotional-impact-experiences/>

<sup>8</sup> See <https://www.communicationsconsumerpanel.org.uk/>

<sup>9</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccpfraudulent-activityreport-of-findingsfuturesight2020.pdf>

risk of more pronounced detriment. The Money and Mental Health Institute undertook research in December 2020, which looked at Online Scams and Mental Health. At a UK level, it found that 40% of online scam victims have felt stressed and 27% have felt depressed, with people who experienced mental health problems being more likely to report both<sup>10</sup>. The financial impact of some scams can also damage an individual's confidence levels and self-esteem, or at the extreme, their ability to live independently at home.

If we are to create a fairer Scotland for all, then we must recognise the importance of taking a "whole person, whole system" approach to scams prevention, enforcement and support. We need to ensure that victims of scams are supported as crime victims, and consider their needs holistically.

The impacts of scams are diverse and intrinsically linked to wider judicial, financial, health and social care support infrastructure. This means that tackling scams – through prevention and capacity building – can bring a wide range of individual and societal benefits and reduce demand on the broader landscape of frontline services.

### **(3) The level and severity of scams being perpetrated is increasing.**

More and more people are switching to digital platforms for both personal and work activities, this has only created new opportunities for scammers to reach a broader populous. The impacts of the current Covid-19 pandemic – both in terms of a shift to home working and the

rate of change in government policy and funding programmes – has also provided scammers the chance to capitalise on general uncertainty, and the acuteness of needs of some people for financial or other types of support. See **Box 3** for an illustrative example.

As Katy Worobec, Managing Director of Economic Crime at UK Finance, said in December 2020<sup>12</sup>:

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“Criminals are experts at impersonating people, organisations and the police. Particularly with the impact of Covid-19 and an increasingly digitised society, criminals are ruthlessly adapting their methods to target consumers online, via social media and over the phone. These scams are often sophisticated and well-researched [...]”

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Across sectors, there has been an evidenced upturn in the number of scams being recorded during the pandemic period. For example, UK Finance reported that its members had seen almost 15,000 instances of impersonation scams between January and June 2020, which represented a 84% increase compared to the same period the previous year<sup>13</sup>.

Many frontline organisations, such as Trading Standards Scotland (TSS), have had to create bespoke advice webpages to provide the latest information on coronavirus scams, due to evidence of new tactics being deployed, including, for example, fraudsters cold calling homes pretending to be NHS staff to provide a

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<sup>10</sup> <https://www.moneyandmentalhealth.org/wp-content/uploads/2020/12/Caught-in-the-web-full-report.pdf>

<sup>12</sup> <https://www.scotland.police.uk/what-s-happening/news/2020/december/new-campaign-as-fraud-continues-to-rise/>

<sup>13</sup> <https://www.ukfinance.org.uk/covid-19-press-releases/impersonation-scams-almost-double-in-first-half-of-2020#notes>

### Box 3: How are scammers exploiting the Covid-19 pandemic?

#### Illustrative Example: NHS Scotland Test & Protect

NHS Scotland's Test and Protect was rolled out across Scotland at the end of May and a new app, called Protect Scotland, was launched to support proximity contact tracing and help suppress the spread of COVID-19. Both are extremely important in the fight against coronavirus. Unfortunately, criminals will exploit every opportunity they can to defraud people of their money, or steal their personal details. Criminals are acting quickly and have started to contact victims pretending to be from the NHS. Below is an illustrative transcript of how criminals can try to exploit the uncertainty and novelty of the Test & Protect programme to trick people in parting with their money, as featured in an issue of the Scottish Government's Cyber Resilience Covid-19 Bulletin, 18 June 2020.

**SCAMMER: 'Good morning, I'm calling from the NHS track and trace service. According to our system, you are likely to have been in close proximity to someone who has tested positive for COVID-19. This means that you now need to self-isolate for 7 days and take a COVID-19 test.'**

VICTIM: 'OK. Can you tell me who that person was?'

**SCAMMER: 'I'm not able to tell you that. That is confidential information.'**

VICTIM: 'Right. Um... so ...'

**SCAMMER: 'But you do need to be tested within the next 72 hours. So can I just get the best mailing address so that we can send a kit to you?'**

VICTIM: 'Ok (gives address)'

**SCAMMER: 'Thank you - and I just need to take a payment card so that we can finalise this and send the kit to you.'**

VICTIM: 'Sorry - a payment card? I thought this was all free?'

**SCAMMER: 'No - I'm afraid not. There is a one-off fee of £50 for the kit, and test results. Could you read off the long card number for me, please, when you're ready.'**

VICTIM: 'No - that's not right. This is part of the NHS so there's no charge.'

**SCAMMER: 'I'm afraid there is. Can you give me the card number please - this is very important. It ensures that you get the test tomorrow. Also there are penalties for not complying.'**

VICTIM: Puts phone down. Calls Police Scotland on 101 to report the incident.

In response to these types of scam attempts during the pandemic in 2020, the Scottish Government liaised closely with Public Health Scotland and Trading Standards Scotland, in order to ensure that clear and consistent advice on what tracers would and would not ask of individuals contacted.

bogus in-home Covid-19 test in exchange for money<sup>14</sup>.

Following the initial national lockdown period in March 2020, TSS reported that "Scottish consumers have reported scammers cold calling households and posing as Red Cross or NHS workers to collect donations for fake Covid-19 charities. Other scammers have posed as

local council staff and offered to buy groceries for self-isolating or shielding individuals, taking their money but failing to return.<sup>15</sup>"

What the pandemic has shown us is not new – scams and the creativeness of their perpetrators is a systemic problem. Rather, what it has allowed is an intensification of existing tactics.

<sup>14</sup> See <https://www.tsscot.co.uk/coronavirus-covid-19/coronavirus-scams/>

<sup>15</sup> <https://www.tsscot.co.uk/launch-of-shut-out-scammers-2020/>

## Chapter 2: Strengthening Our Approach

Having established that tackling scams is important in our ambition to create a Fairer Scotland for all, the following section outlines the primary gaps that we have identified – through engagement with the Advisory Group – in the existing approach to doing this in practice, and where we aim to introduce strategic change to add best value to outcomes. Areas for improvement are presented according to:

1. What is not working as well as it could for people on the ground in terms of being able to avoid scams, and access support from frontline services; and
2. What is not working as well as it could for advice and enforcement bodies to be able to take effective action, both to deter or disrupt scammers and to support those in need when they are victimised.

In being transparent about the processes and systems in place at present, and what can be done to further strengthen their effectiveness, our aim is to build on good work to date being delivered by partners to combat scams.

### Being Proactive

When people think about scams, first instinct is often to consider what happens when someone becomes a victim. This is important, but equally so is how we can actively remove, reduce or disrupt the connection pathways between scammers and members of the public in the first place. This means understanding the gaps and / or barriers to effective communication and education provision.

## Awareness Raising Campaigns

As is demonstrated in the previous section, there is a whole host of work underway across partner organisations to raise awareness of scams and the cunning tactics used by criminals to target people. In order for people to avoid a scam, they must know about it and what signs to look out for that can indicate risk. There is a lot of good work already being delivered by stakeholders to ensure that people have the right information on new and emerging scams, as soon as possible and that people remain vigilant. During the current global pandemic this has almost become more important due to the quick and ready proliferation of scams in recent months.

Speed is essential. The ability of relevant organisations to be able to swiftly identify, share and disseminate information on new scams as and when they are first spotted is generally acknowledged as being highly important to the effectiveness of proactive scams prevention communications to members of the public. The sooner people can be made aware of any change in tactics being deployed, then the fewer are likely to fall victim. They will be prepared, ready to recognise key indicators. A good example of how this is done in practice through the use of technology is the targeted Neighbourhood Alert system run by Neighbourhood Watch Scotland. This system delivers targeted local safety information alerts and advice – via text, phone or email – to self-registered recipients, including advice on the latest scams.

At a national level, the truth is that the impacts of Covid-19 on the number and nature of scams in Scotland has, in fact, driven and accelerated a new level of partnership working. This is now enabling a much faster rate of turnaround of intelligence into meaningful and widely communicated messages to the general

public. The Scottish Government is actively collaborating with Police Scotland, the Scottish Council for Voluntary Organisations (SCVO), and the Scottish Business Resilience Centre (SBRC), to produce the monthly CyberScotland bulletin. The bulletin is designed to provide information on the latest threats, scams, news and updates covering cyber security and cyber resilience topics and training resources. Due to the pandemic, the bulletin currently also includes information about a much wider range of scams, including doorstep and nuisance or scam calls.

Trading Standards Scotland (TSS) have also developed the Scam Share bulletin, which is a weekly bulletin that provides information on the latest scams reported by people across Scotland. The bulletin is distributed through various networks, and people can sign up to receive the latest bulletin direct by email.

In taking forward larger campaign based activity, advice and enforcement delivery partners have also been quick to adapt their methods of communication to a predominantly digital format, due to social distancing rules brought in due to the pandemic.

For example, Trading Standards Scotland (TSS) and Police Scotland launched the annual Shut out Scammers campaign online, in June 2020. Each year the campaign aims to draw attention to doorstep crime as well as nuisance, or scam calls. In its most recent form, the campaign focused in particular on scams that are linked to rogue traders and cold callers. Other partners, including Advice Direct Scotland, Neighbourhood Watch Scotland and the Scottish Fire and Rescue Service, also supported its delivery. Another recent discrete campaign around scams that took place was Advice Direct Scotland's (ADS) 'Stop Scams Calls' social media initiative,



Figure 3: Example Shut Out Scammers 2020 campaign material produced by TSS

launched in December 2020. The campaign sought to encourage consumers to activate existing call blocking services available through their telecommunication service providers, such as BT, Sky and TalkTalk.

However, despite all the genuine added value that the aforementioned types of scams awareness raising initiatives create, the considerations made by the Scams Prevention Partnership & Advisory Group have shown us that still greater impact can be achieved through addressing some outstanding challenges. The focus must be on fostering collective and collaborative approaches to proactive awareness raising work as default.

While not always the case, in general at present it can be said that:

- ✗ Delivery of multiple scams prevention campaigns by different organisations at a similar time can create a cluttered landscape. For example, last year two major anti-scams campaigns ended up

running across the same time frame, namely Shut Out Scammers, and the national Scams Awareness Fortnight, in June 2020. Each campaign had its own particular area of focus, with slight differences in the range and coverage of signposting to reporting and wider support channels in a Scottish context;

- ✘ Messaging across scams prevention campaigns conducted at similar times, and / or focused on a related issue, are not always consistent;
- ✘ There is no organised approach to the delivery of education based scams prevention capacity building across different groups of people in vulnerable circumstances across Scotland as a whole.

What does all this mean in practice for real people on the ground who stakeholders are trying to help?

There is general consensus amongst frontline advice service providers, enforcement bodies and wider advocacy organisations that effective messaging on scams prevention demands a year-round process of communication. A crucial tool in fighting scammers is for members of the public to remain vigilant at all times to spot the signs of a potential scam, so that they can actively avoid them. Those who carry out scams against the unsuspecting have no set timetable for when they operate, and will always be on the lookout for new opportunities to exploit. This means that while some scam types may be seasonal in nature, there is no real “down time”, or the absolute absence of the risk posed by scams at any point in the calendar year.

Some partners have already taken steps to expand their campaigns work to reflect this. UK Finance – a representative body for the UK finance and banking industry – has introduced the ‘Take Five to Stop Fraud’ campaign as a longstanding initiative. As well as running standalone campaign awareness raising activities linked to particular ‘high risk’ events, or periods in the year (such as Black Friday<sup>16</sup>); as a whole, the campaign initiative seeks to also embed a degree of consistency across the finance sector regarding messaging, protocols and processes to support people at risk of financial fraud<sup>17</sup>. While the campaign is not tailored to a Scottish context, the model provides one example of delivery around a central campaign programme that can be used to easily, effectively and consistently distil key messages throughout the year.

In a similar vein, the Financial Conduct Authority (FCA) now runs the ScamSmart campaign, which focuses on protecting people from investment and pension based scams. Again, by using clear branding and associated marketing techniques such as standard social media tags, the campaign initiative seeks to raise awareness throughout the year around the same topic with a degree of consistency and recognition<sup>18</sup>.

There is an opportunity to use a consistent approach towards awareness raising that is applied across all types of scams, and for different groups of people.

### **Education Programmes**

Building greater vigilance against scams – of all types – can also be achieved through embedding the right skills and knowledge as part of systemic education programmes across different settings.

<sup>16</sup> <https://www.ukfinance.org.uk/news-and-insight/blogs/bargain-or-scam-take-five>

<sup>17</sup> See <https://takefive-stopfraud.org.uk/>

<sup>18</sup> See <https://www.fca.org.uk/scamsmart> ; <https://www.facebook.com/fcascamsmart/>

Much good work has already been done to help progress this agenda, for example in relation to online safety and cyber resilience in Scotland, through the Cyber Resilience Learning & Skills Action Plan 2018-20<sup>19</sup>. In previous years in Scotland, there have also been bespoke initiatives trialled such as the “Young Consumers of the Year Competition” – delivered by the Chartered Trading Standards Institute and local Trading Standards Officers, to improve general knowledge among school children of consumer rights and law.

The challenge is that because scams are not solely perpetrated through online platforms, we recognise that more work needs to be done to ensure a comprehensive package of educational materials are available so that no one is left behind or made more vulnerable by an absence of tailored support.

Doorstep and/or phone based scams can be as detrimental to those affected as a scam that has been committed over the internet, using email or other platforms. Often times a scam can also start out in one form in order to “hook” the individual, such as a text message, before then evolving into something more complex that involves multiple platforms, from phone calls to fake URLs. This means that education provided to proactively protect people from falling victim to scams needs to cover a spectrum of scam tactics.

Based on the considerations made by the Advisory Group, it is evident that while pockets of valuable local to national level awareness raising activities are already underway on various fronts, there is no overarching plan to help coordinate these

efforts. Alongside public sector bodies such as Police Scotland, TSS and local authority trading standards departments, we need to continue to support the work of many third sector charities and community level organisations. And we need to find ways of better integrating the awareness raising activities of each with one another so that scams prevention education across Scotland is:

- more consistent;
- wider ranging in content; and
- delivered through the most appropriate way, in terms of purpose, content, and channel, in order to maximise impact for target audiences.

Key to the targeting of strategic communications is the use of evidence. The more that we are able to support the sharing of research findings and intelligence between key scam prevention organisations to inform education and awareness raising work, then the more likely it is that the approach to delivery can be designed to match the interests and needs of different groups of potential scam victims. For instance, in delivery of the 2019 national Scams Awareness Month campaign in Scotland, Citizens Advice Scotland – working in partnership with TSS – drew on a range of evidence from surveys, to bureaux data and TSS scams intelligence, in order to develop a robust Communications Plan that took into account both young and elderly demographics, as well as types of scams<sup>20</sup>. This then helped to shape the tactics used on the ground, and the key partners that CAS sought to engage as part of disseminating the campaign messages.

<sup>19</sup> <https://www.gov.scot/publications/learning-skills-action-plan-cyber-resilience-2018-20/> ; see also <https://www.gov.scot/publications/firm-foundations-progress-report-safe-secure-prosperous-cyber-resilience-strategy-scotland-2015-2020/>

<sup>20</sup> See [https://www.cas.org.uk/system/files/citizens\\_advice\\_scams\\_awareness\\_toolkit2018b.pdf](https://www.cas.org.uk/system/files/citizens_advice_scams_awareness_toolkit2018b.pdf)

## Streamlining Advice & Enforcement

Being proactive in the fight against scams is challenging for enforcement bodies that seek to stop or disrupt criminals engaged in scams. One of the main difficulties relates to data sharing.

In line with the fourth pillar of Scotland's Serious Organised Crime Strategy (2015)<sup>21</sup> – namely to disrupt serious organised crime groups – improving access to, and the transparency of key information and intelligence between multiple enforcement agencies is important in being able to identify and pre-empt scammers.

And in order for us to establish a “whole person, whole system” approach to scams prevention in Scotland, we need to ensure that the shared wealth and power of data from across the landscape is being drawn on to identify and intervene against scammers.

What makes this hard is the current disconnect between the internal data management systems of frontline consumer and citizen advice services' and relevant enforcement bodies.

There are many different organisations that a person may reach out to for help if they feel they have been victimised by a scammer in Scotland, this means there is a high level of rich data to be tapped into beyond the immediate call records of enforcement bodies such as Police Scotland.

However, how these organisations code – or categorise – a call relating to a scam incident is variable. This means that it is not straightforward for intelligence between advice providers and enforcement bodies to be readily collated

on a like for like basis. In turn, this can lead to a poorer experience for victims, and a reduced ability to identify, track and enforce scams prevention at a strategic level.

Overall, without changes being made to how certain data can be accurately and safely shared between partner organisations, the wider national picture of scams in Scotland may be difficult to fully capture or verify.

Where data collection can be effectively aligned and shared then organisations may be able to more quickly identify and disrupt, or ideally apprehend scammers; and interventions or required investment can be more efficiently identified and justified.

Admittedly, regardless of what improvements can be made to the existing system, we will never know for sure if the picture painted is complete. But the more we can do to support partners to engage and liaise with one another to pool data and use this effectively to spot trends and derail emerging scams, then the more likely it is that collectively we will be able to help protect more people through proactive intervention.

## Scams Reporting and Supporting Victims of Scams

### Complexity of the Landscape

In the first instance, a victim of a scam needs to know how they can report the incident and to who.

There are already various reporting channels that provide options for different user groups to notify someone of their situation, with varying levels of feedback or further support on offer.

<sup>21</sup> <https://www.gov.scot/publications/scotlands-serious-organised-crime-strategy/>

Scams can be difficult to recognise, but there are things you can look out for.

You can use our online scams helper to get advice that's specific to your situation.

### Our advice for you

Based on what you told us, here's what we recommend.

- Check the signs of a scam message +
- Check common energy scams +
- Don't click on scam links or downloads +
- Don't transfer any money unless you're sure who it's going to +
- Don't be pressured into acting quickly +

You can also [get help from a scams adviser](#) if you're not sure whether something is a scam.

**Figure 4:** Citizens Advice Scotland's (CAS) Scams Action online web-chat service

For example, both Citizens Advice Scotland (CAS) and Advice Direct Scotland (ADS) have developed online scam tools. The Scams Action online web-chat service delivered by CAS provides specialist one-on-one help for people who are worried they are being scammed, and those who have already lost money. The CAS website also provides a checker service, where people can answer some basic questions and the system will help determine whether something might be a scam and what to do if the individual has been scammed. ADS' ScamWatch Quick Reporting Tool is available 24 hours a day to report suspected scams and suspicious activity. Where further investigation is required relating to a consumer regulation violation, information is referred by ADS directly to Trading Standards Scotland. Individuals can also be directed to phone Police Scotland 101 for non-emergency calls, where an assessment of any appropriate criminal enforcement action is then made.

At a local level, bespoke reporting initiatives have been introduced in certain

areas in order to safeguard particular groups. Working in consort with the police, Angus Council has established the Financial Abuse Support Team (FAST)<sup>22</sup>. The purpose of this team is to take quick action in response to local reports of financial scams against people in vulnerable circumstances, with a particular focus on supporting elderly residents who may already be known to the local authority's adult protection team.

Looking more widely at the UK / GB landscape, the consumer body, Which?, is also in the process of developing a scam reporting tool, to be informed by research looking at how consumers describe scams and scam enablers. People living in Scotland can also use the National Cyber Security Centre's open source Suspicious Email Reporting Tool to report suspicious emails ([report@phishing.gov.uk](mailto:report@phishing.gov.uk)); and notify their mobile phone providers of suspicious text messages by forwarding any to the free-of-charge phone number, 7726.

Unfortunately, given the breadth of scam types and their impacts, a perennial problem is:

- ✗ People can struggle to navigate what is in effect a very large, complex and sometimes convoluted reporting and support landscape.

Industry specific research – such as in the financial services sector – shows that a lack of knowledge of where to go in order to report a scam is a very common reason for why cases go under-reported<sup>23</sup>.

Wider European level research evidences that the extent to which the person believes that reporting the scam will make

<sup>22</sup> See [https://www.angus.gov.uk/noise\\_neighbours\\_pets\\_and\\_pests/scam\\_free\\_angus/how\\_to\\_protect\\_vulnerable\\_people\\_from\\_scams](https://www.angus.gov.uk/noise_neighbours_pets_and_pests/scam_free_angus/how_to_protect_vulnerable_people_from_scams)

<sup>23</sup> See e.g. <https://www.aviva.com/newsroom/news-releases/2020/07/almost-half-of-people-dont-report-coronavirus-scams/>

a difference and that they will hear about it influences their likelihood of reporting<sup>24</sup>. In other words, what matters includes effective feedback loops.

However, it is not enough to assume that everyone might be looking for the same type of support or outcome when actively

seeking to report a scam, or scam attempt. In some cases, a person might simply want to be a "good citizen" and let the right authorities know that they have been approached by a scammer – but the actual level of harm, and therefore need for support or redress, may be minimal.

#### **Box 4: Stigma and the Downward Spiral – repeat victims of scams**

##### **Case Study: East Renfrewshire Council Scam Prevention Team, Age Scotland**

This case study is a real-life example of what has happened to someone living with dementia because of a scam.

John is a proud retired professional who is living independently with dementia. His wife died several years ago and his only daughter lives 30 miles away. A home carer arrived at his house one day and saw that 3 men were working on the roof of his property. They had cold called having noticed a loose roof tile from the road. They initially quoted £80 but had since claimed that the roof needed emergency repairs and the cost had rocketed to £7,500. John was upset and confused and indicated he just wanted to pay the men to get them to go away as he felt threatened and embarrassed. The carer contacted the Police and Trading Standards scam prevention team. The workmen cleared off when they realised that the Police were investigating. The Trading Standards scam prevention team then visited John to give him advice on avoiding scammers in future. John was also being targeted by scammers on the phone and through large amounts of mail claiming he had won various prizes.

Sadly, John had responded to a large number of fraudsters and had taken over £100,000 of his savings from his account to pay scammers from all over the world. The Scam Prevention Team worked with adult protection and third sector partners to look at the best way to safeguard John and improve his life.

What happened next:

- His daughter became his Power of Attorney for welfare and financial matters.
- John received a free nuisance call blocker to stop all unwanted sales or scam calls.
- A No Cold Calling Sticker was displayed on his front door.
- A community alarm/telecare system was installed.
- His mail was redirected to his Power of Attorney.
- A list of Trusted Traders was supplied to him and his family for future use.
- A claim went in via the banking ombudsman to reclaim the money lost to scams.
- He has joined a local supported art class and feels less isolated.
- John has lost no more money to scams and his anxiety levels have reduced. His daughter is also more confident in John's ability to maintain independent living.

\*This case study has been drawn from Age Scotland's 2019 publication, "Scam prevention: Information for carers of people living with dementia", available for download at <https://www.ageuk.org.uk/globalassets/age-scotland/documents/ia---factsheets/dementia/dem-14-scams-carers-of-someone-living-with-dementia-aug-19.pdf>

<sup>24</sup> See [https://ec.europa.eu/info/sites/info/files/aid\\_development\\_cooperation\\_fundamental\\_rights/ensuring](https://ec.europa.eu/info/sites/info/files/aid_development_cooperation_fundamental_rights/ensuring)

[aid\\_effectiveness/documents/survey\\_on\\_scams\\_and\\_fraud\\_experienced\\_by\\_consumers\\_-\\_final\\_report.pdf](https://ec.europa.eu/info/sites/info/files/aid_development_cooperation_fundamental_rights/ensuring)

In light of these challenges, there is scope to streamline the user journey from first point of contact, through to provision of support and feedback. And as part of this, there is scope for us to further consider how we work together with partners to reduce the onus on the individual to have to understand the nature of the scam they have been faced with in the first instance, in order to know who the right organisation is to go to for advice.

To achieve this, through engagement with the Advisory Group it has become clear that more work is also needed to support relevant advice and enforcement bodies in developing a coherent and shared understanding of each other's specific: roles, corporate remits, responsibilities, levers of change and resources available to combat scams in Scotland.

Only by clarifying the existing landscape for those who participate in it can we begin to identify new opportunities for further improving the system as a whole, and simplifying the journey for individuals reporting scams and looking for advice and support.

The more that can be done to promote an assets-based approach to streamlining of scams reporting and support provision in Scotland, then the more we might be able to facilitate identification of potential new ways of doing things at an operational level, improving services or providing resource savings.

### **Under-Reporting of Scams**

Not everyone who is faced with a scam will actively look to tell anyone about it, not even their own friends and family.

One significant – and well recognised – reason why people may avoid discussing

their experience of having been victimised by scammers is the stigma that can be associated with it. Research shows that people can attribute a sense of shame, embarrassment or self-blame to having engaged with scammers, feelings that are sometimes more prominent amongst older individuals<sup>25</sup>. As a result, some victims of scams remain silent. They feel unable or unwilling to admit that they did not spot what was happening, as they fear it reflects badly on their own abilities to safeguard against crime, as if in way they failed to apply common sense and reason.

This means that advice and enforcement bodies may not have a full understanding of the extent of the issue in Scotland. It also means that there is a strong likelihood that many people in vulnerable circumstances are at more risk of falling into a downward spiral of victimisation by scammers. Those who have been scammed can be more likely to experience repeat scam attempts. If they do not report in the early stages then they run the risk of being drawn in further by the scammer. Sometimes this goes to the point where they become unable to see a way out, and become not only financially, but emotionally drained over a longer period of time.

**Box 4** provides an example of the extreme level of financial detriment that someone can experience as a result of repeat scam attempts, and a failure to talk about things with support networks. The case study also demonstrates the importance of joined up public services for the provision of holistic support to victims of scams.

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<sup>25</sup> See, for example, <https://reassura.com/wp-content/uploads/2018/06/Tackling-the-taboo-Reassura-Centre-for-Counter-Fraud-Studies.pdf>

### Chapter 3: A New Strategic Framework

In order to address scams effectively we must advocate and support the adoption of a new, coordinated and comprehensive approach in Scotland. We know that good work is already underway across partner organisations, from local to nation level. We recognise that we are not starting at the beginning – we must build on good practice, share learning and continue to draw on experience and assets in the landscape, if we are to be successful.

As the previous chapter sets out, we also know that there are perennial challenges to be overcome if we are to truly deliver improved outcomes for people living in Scotland at risk of, or victimised by scammers.

If we are to achieve our **vision** – to establish Scotland as an inhospitable environment for scammers to operate and exploit people, where people feel safe against the risk posed by scams and can readily access effective support to meet their needs – then we must realise the full potential of the existing enforcement and support landscape.

We talk about the value of taking a **“whole person, whole system”** approach to tackling scams, but what does this mean?

In practice, this means attending to the multiple needs of the individual who may be at risk or, or has been directly impacted by a scam, by building more joined up services across all stages of scams prevention work. Individuals need to be well-equipped to deal with the risk posed by scams, they must be resilient. And those in vulnerable circumstances must feel listened to and a part of the decision-making process to determine the best preventative measures for their situation. As victims of a crime, those who have experienced a scam must be

#### Box 5: Example of a pilot project demonstrating a person-centred approach to scams prevention amongst those living with dementia

The Life Changes Trust awarded £406,590 to three local authorities from 2016 and 2019. East Renfrewshire, Angus and South Ayrshire used the funding to work together to develop, pilot and evaluate a preventative approach to protect people with dementia from financial scams, so that they can better maintain their confidence and ability to continue living independently at home [...].

This work involved the development and delivery of a package of preventive measures to offer people with dementia an individualised, person-centred approach to safeguard them from financial exploitation on the doorstep, by telephone, mail or online, including practical solutions and assistive technology, for example call blockers and ‘no cold callers’ badge for their front door. They also produced awareness-raising materials and a training programme for organisations working with people with dementia, developing a good practice model which can be rolled out across Scotland.

In June 2020, the Life Changes Trust published the evaluation report of the Scams Prevention Project; and at the same time, Trading Standards also produced a report 'Blocking Scam and Nuisance Calls for People Living with Dementia'. Both can be found on the website cited below.

\*This example has been taken from The Life Changes Trust website.

treated with compassion and respect, and should not feel judged or discriminated by circumstance.

A good example of how such an approach has been piloted at a local level can be

seen through the recent success of The Life Changes Trust's funding to three local authorities, focused on introducing a package of person-centred support to combat scams amongst those living with dementia<sup>26</sup>.

To achieve this over the long term, we have developed a **strategic framework that seeks to introduce a more integrated approach** across the scams prevention and support landscape – see **Figure 5**.

### **Pillar (1): Prevention & Disruption**

- ✓ Work with partners across private, public and third sectors to attempt to proactively deter, disrupt and, ideally, stop scams from reaching victims, using digital technology, innovation, and improving processes and protocols.

### **Pillar (2): Education & Awareness Raising**

- ✓ Focus on enabling people through building resilience, vigilance, knowledge and skills to avoid the risk that scams pose

### **Pillar (3): Advice, Support & Enforcement**

- ✓ Work with frontline advice services and enforcement bodies to streamline the scams reporting and advice landscape, including through facilitating better data and intelligence sharing, in order to develop a “whole person, whole system” approach to provision of support and effective intervention.

This framework **supports both proactive and reactive activities** that seek to

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reduce the ability of scammers to target and carry out scams; and also reduce the severity of consequences when a scam is successful.

The framework will encourage and **facilitate greater capability and capacity building** at a national policy level, at a stakeholder operational level, and at an individual level.

By identifying **key enablers – to achieve successful prevention, education/awareness raising and enforcement action – and cross-cutting principles**, the framework aims to provide shared focus for investments and policy alignment to combat scams across partner organisations.

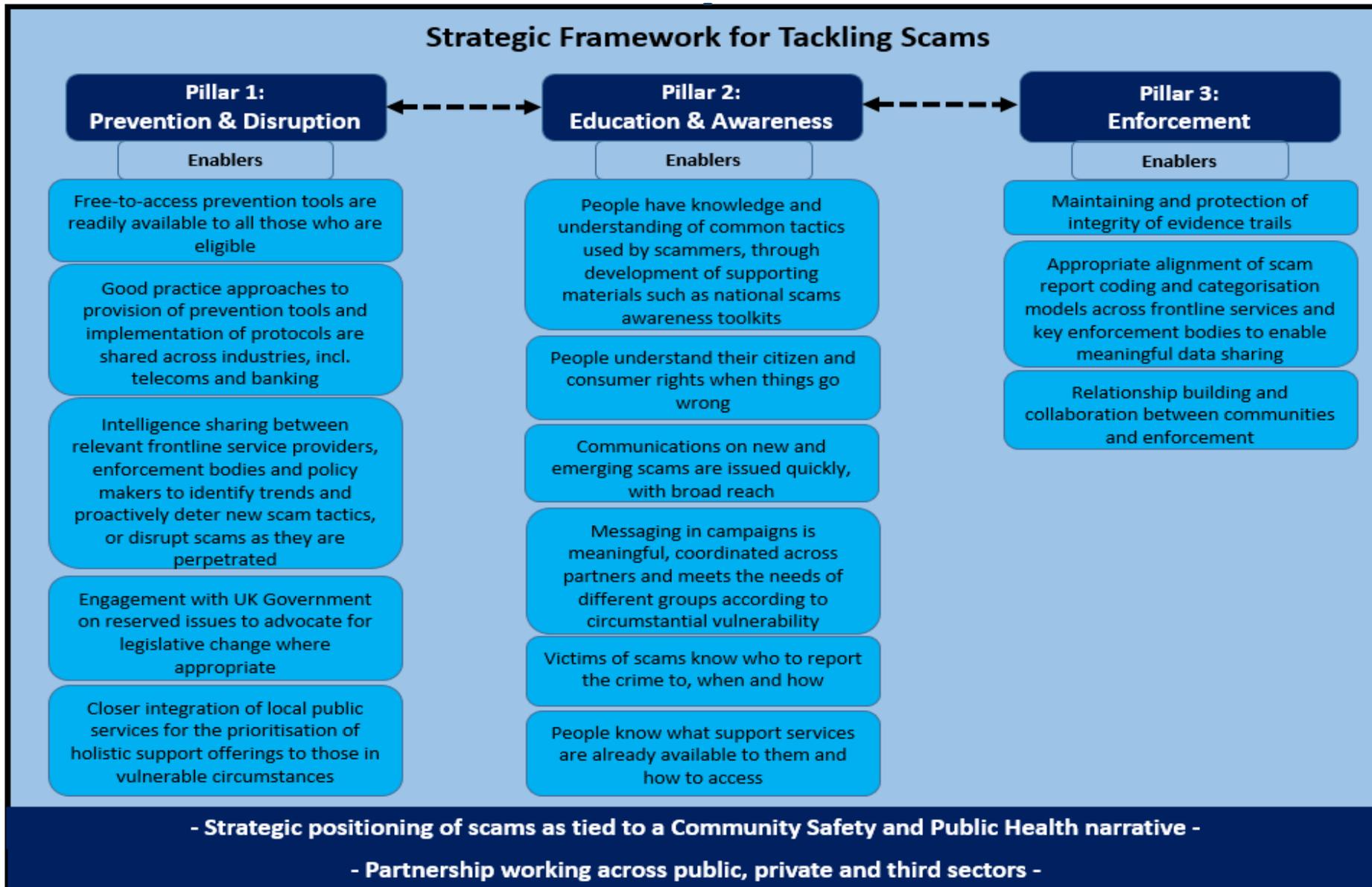


Figure 5: A strategic framework for tackling scams in Scotland - the three pillars.

## Implementing the Framework – Partnership Oversight

We will continue to work closely with a range of partners to implement this strategic framework over the long term. In order to achieve this, we will establish a new **Scottish Scams Prevention Partnership**, (“the Partnership”).

In its early days of operation this group will be treated as a natural evolution of the current Advisory Group, akin to a de facto Strategy Delivery Group. Specific sub-groups will be formed, as appropriate to oversee and support first steps in delivery of key work-streams set out in this strategy – see **Table 2**.

Membership will be determined through consultation with stakeholders – and relevant Scottish Government policy teams – according to shared interests and delivery objectives.

The Scottish Government will Chair the Partnership in its inaugural year, in line with the group’s initial remit to lead implementation of the new strategic framework in practice. Partners will then be consulted to determine an appropriate model for future chair and secretariat functions to be put in place, and when, with the aim being for the group to take on its own standalone identity within the wider Scottish scams prevention landscape. The Scottish Government will remain supportive and will engage with the Partnership moving forwards.

The following sections outline the steps that we are already, or will take with partners in order to implement the three pillars of the strategic framework – and begin monitoring impact – over the next three years, 2021-24.

## Implementing the Framework – Actions

The main strategic areas of activity the Partners will oversee and support, are as follows:

### Pillar (1): Prevention & Disruption

#### Sector-based Prevention Interventions

In close consultation with relevant regulatory bodies, we will establish a set of working-groups with key partners to take forward specific **sector reviews, or deep dives** to explore and better understand potential opportunities for piloting projects that support improvements in service provision, processes and/or protocols within, for example: banking and finance, and tele-comms. This may be achieved through procuring research, and facilitating the sharing of good practice approaches, greater innovation and use of digital technology, within existing regulatory frameworks.

The purpose will be for partners to consider and assess feasibility of discrete options for change, building on initial insights to date, including for example: removing the three-digit security code on the back of bankcards owned by those in vulnerable circumstances and integrating with “power of attorney” or independent advocacy services so as to promote increased use of two-step verification processes for payment authorisations, as supported by third party networks.

A central tenet of considerations that partners will be encouraged to make as part of this work will include how best technology can be used to reduce the onus on the individual to be able to spot, and react to potential scam attempts within key sectors.

Framework Pillar(s)		Delivery Group(s)	Purpose
Partnership led, secretariat support provided by the Scottish Government			
Cross-Cutting, but with an overarching focus on Education & Awareness Raising		Formal ‘Scottish Scams Prevention Partnership’	<p>This group will be created as an independent, standalone addition to the scams prevention stakeholder landscape in Scotland, to support on-going dialogue between partners – sharing good practice, intelligence, opportunities for joint interventions.</p> <p>The formalised nature of “the Partnership” will enable it to also act as a collective voice on strategic communications relating to scams, as appropriate, in order to inform the public, wider stakeholders and government. As part of this function, this group will oversee development and ownership of a Strategic Partnership Communications Plan – and associated calendar of events – to inform future campaign work across Scotland. The group will also be consulted by the Scottish Government to inform development of a strategic Education Action Plan.</p>
Sub-Groups	Prevention & Disruption	Sectoral Working Groups	Conduct sector-based reviews and/or exploratory work to identify opportunities for sharing good practice approaches, or improving processes or protocols through new interventions, using innovation and technology where appropriate.
	Enforcement	Steering Group	Lead on a review of how best to streamline the scams reporting and access to advice landscape, deciding appropriate strategic direction of travel for change.
Scottish Government led, internal			
Cross Cutting		Scams Prevention Policy Reference Group	A policy reference platform to enable relevant teams to sense check added value and alignment of on-going strategic policy developments and delivery, across key topics, such as: consumer advice, cyber resilience, organised crime, community safety, public health.

Table 2: Delivery groups for key strategic actions as set out, 2021-24.

For example, initial discussions have already been had between the current Advisory Group and expert digital tech organisations such as Vistalworks<sup>27</sup>, to understand the principles and potentials of online based digital solutions in the scams prevention space. There are potential options for existing technological interventions used to combat online illicit trade to be adapted to also auto-defend against single-point scams, i.e. those perpetrated via one specific medium, like a false URL, at one point in time against a victim. At present, frontline, public-facing digital anti-scams software that can detect and protect against multi-platform – or long-term evolving – scams is likely to be less feasible.

Significant digital innovation can come with high initial development costs. For this reason, any considerations of this type that identify new pathways for technological solutions will need to be accompanied by work to model the long term financial sustainability of such interventions, and opportunities to share costs and benefits.

We will work with partners across sectors, as appropriate in order to make these determinations as and when required, including considering existing funding innovation programmes, such as CivTech<sup>28</sup>, as potential ways forward.

We anticipate membership to the sector-focused working groups expanding beyond that of the overall Partnership, in order to ensure representation of key stakeholders across specific sectors. We will liaise with key sector representative bodies – such as UK Finance – as well as recognised consumer bodies with a unique focus on particular sectoral issues – for example the Communications

Consumer Panel<sup>29</sup> – as part of preliminary work to identify those best placed to input to working group discussions.

## Pillar (2): Education & Awareness

### Communications

The newly established **Scottish Scams Prevention Partnership** (“the Partnership”) will be embedded as a standalone, formalised partnership group – with a clear identity and position within the wider stakeholder landscape – to act as a collective voice when it comes to communicating both key preventative messages on scams to members of the public; and advocating for further change in policy or operational approaches as they relate to all three pillars of the strategic framework.

By seeking to create a shared identity across frontline advice service providers, enforcement agencies, wider regulators and industry representatives, we aim to foster more formal and productive means of collaboration and coordination between stakeholders. In turn, this should translate into more impactful, coherent and harmonised communications to members of the public, regarding new and emerging scams and scam tactics identified through shared data and intelligence.

In addition, and as set out earlier in this strategy, “scams” are a criminal activity and do not represent a solely consumer-based issue. There are specific nuances and enforcement based considerations relating to scams that are discrete, and separate from purely consumer based detriment. In this sense, we do not feel it

<sup>27</sup> See <https://www.vistalworks.eu/illicit-trade-prevention>

<sup>28</sup> See <https://www.civtechalliance.org/civtech>

<sup>29</sup> See

<https://www.communicationsconsumerpanel.org.uk/>

appropriate to expect the responsibility for coordination of the wider scams prevention stakeholder and intelligence landscape in Scotland to inevitably fall to the upcoming national strategic consumer advocacy body, Consumer Scotland<sup>30</sup>.

This is not to say that there may not be a role for the new Scottish Scams Prevention Partnership to help to inform and support shared ambitions with Consumer Scotland, as and when appropriate. But the extent to which Consumer Scotland chooses to engage with this agenda will be one for its independent Board to decide when setting its inaugural work-plan priorities in due course.

The Partnership will agree a set of key voluntary principles of collaboration to combat scams in Scotland to help engender real ownership and shared action around the work of the group.

This may include establishing a recognisable brand and an online presence – or “hub” – for the Partnership, where key research, insights reports, commentary, media messages and wider intelligence sharing can be posted collaboratively for wider dissemination. We will discuss with partners who may be best placed within the existing landscape to take on hosting and maintenance of this platform, if such an approach is adopted. The advantage of this model is that it would then allow the Partnership to also participate – and engage – on an equal footing with corresponding groups operating in related fields, such as the newly created Cyber Scotland Partnership. By drawing on the collective authority, legitimacy and expertise of its members, the Scottish Scams Prevention Partnership will be able to seek representation at wider UK – or even

international – fraud prevention groups, ensuring that Scotland is plugged in to key intelligence and operational initiatives.

We envision the Partnership meeting on a regular basis throughout the year – likely quarterly – as a way of extending, and maintaining the momentum and dialogue that the current Advisory Group has facilitated between organisations. The discussion space that such a platform can provide to partners to be able to continue to share good practice approaches, learn from one another’s experiences, and work to take forwards new joint initiatives, is invaluable.

It will be for members to decide, but the Partnership may choose to operate a rotating Chair model, allowing the opportunity for different strategic partners from across sectors to help shape and steer the collective voice of the group over time.

As part of its function, the Partnership will lead on development of a shared **Anti-Scams Strategic Communications Plan, and accompanying calendar of events**, in order to support a more coordinated approach to campaign work delivered by a range of partners across the year. This work will be supported by the Scottish Government as appropriate.

As has already been highlighted, there is currently an absence of consistent year-round coordination of cross-organisational communications in Scotland relating to scams prevention and awareness raising. It is also unclear to what extent there is consistency in messaging on key scam topics between all relevant Scottish based organisations and UK wide organisations, such as National Trading Standards. As

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<sup>30</sup> See <https://www.legislation.gov.uk/asp/2020/11/content/enacted>

has been touched on earlier in this strategy, scams are not limited by geography – many transcend regional, national and even international boundaries. Both the Scottish Government and other partners have already, or are actively looking to take steps to engage broader stakeholder groups for this reason, such as Project Etherin<sup>31</sup> – led by the National Economic Crime Centre – and the UK Multi-Agency Communication Group – managed by the City of London Police – in order to best understand how such initiatives can further help to inform Scottish scams prevention messaging.

In taking forward development of a new co-owned Anti-Scams Strategic Communications Plan, we will further support partners to consider and agree how best they can work together strategically to introduce a greater degree of consistency to scams awareness messaging and campaign activities in Scotland, where appropriate.

Different partners will have different levels of reach to particular groups of individuals; they will also have different levels or types of expertise concerning scam tactics that can be lent to certain communications.

A first step in achieving this may include conducting a review of existing scams campaign work in Scotland, over the last three to five years. The focus of this review could be to identify any key gaps in either:

- Coverage of content included in mainstream (annual) anti-scams or awareness raising campaigns; and / or the different groups of people in vulnerable circumstances whose needs are consistently being met, or

not through existing national campaign projects. This can include – but is not exclusive to – the elderly, young people, those who are socially isolated, those who are not digitally literate, and those with underlying mental health conditions.

- The key resources available across the Partnership, and the development of a set of underpinning communication principles – akin to a strategic messaging protocol – relating to certain scam types, or tactics that can then be rolled out coherently, according to context.

An accompanying shared calendar of events will allow partners to align campaigns in-year to avoid any risk of potential duplication, or cluttering of the media space, so as to ensure integrity of key messages and information for the target audience. It will also support partners in developing shared narratives, or themes throughout the year, in recognition that scams are a year-round challenge, not a one-off issue at any one point in time.

There are existing communication toolkits that partners can draw on to help inform this work. For example, in 2018 Citizens Advice produced a Scams Communication Toolkit – via a third party consultant – that was based on both a review of behaviour science literature, and qualitative findings from public engagement across London, Leeds and Cardiff<sup>32</sup>.

The real test will be putting any new Anti-Scams Strategic Communications Plan – and shared calendar of events – into practice. Initial discussions have been had between partners – including Advice

<sup>31</sup> Project Etherin has been launched to tackle financial fraud in response to the Covid-19 pandemic, and represents a cross-enforcement body initiative at UK level.

<sup>32</sup> See [https://www.cas.org.uk/system/files/citizens\\_advice\\_scams\\_awareness\\_toolkit2018b.pdf](https://www.cas.org.uk/system/files/citizens_advice_scams_awareness_toolkit2018b.pdf)

Direct Scotland, Which? and Trading Standards Scotland – to consider options for delivery of a wider joint campaign programme later in 21/22 focused on providing tangible support to people, such as call blocker installations and scams awareness material.

Campaign activities could include road shows, online events, parliamentary work, and media releases. Timing of this campaign is subject to the easing of lockdown restrictions in order to ensure high impact through face-to-face and community based engagement. Wider partners have indicated their general willingness to further support such a campaign when the time is right.

As a lead-in to this type of partnership led campaign focused on providing real-world practical offers of support and intervention to people on the ground, Trading Standards Scotland recently launched access to over 700 call blocker units across Scotland, supported in part by £60,000 of Scottish Government grant funding. These will now be available throughout 21/22 for dissemination to those in need.

### Strategic Education Action Plan

Through consultation with the new Partnership, we will **develop a set of specific actions to address any gaps in existing education materials and approaches** available to people across different settings (from schools to work to communities) and risk groups, to build resilience against scams and their impacts.

An initial desk based review of capacity building activities already underway in related areas, such as cyber resilience, will be undertaken to support these considerations; and case studies of good

practice approaches will be developed to be shared across education providers.

Through engagement with the Partnership, we will also explore ways to embed within education providers the principles and skills required for individuals to effectively assess the level of risk associated with potential scams, and appropriate responses.

Our focus will be on capacity and capability development, enabling but also empowering people to be able to take more control over a situation and be confident in pursuing online – and offline – activities because they are aware of the risks and are able to manage them.

We recognise the need to find an appropriate balance in approach between making people sensitive to the issues, and ensuring that those in vulnerable circumstances do not become over-sensitised to the extent that they become overly concerned about the risks, potentially causing distress and withdrawal from positive engagements.

### Pillar (3): Enforcement

#### Streamlining the reporting and advice landscape for scams

Conduct an **options appraisal** to better align the work of enforcement and advice bodies, including: considering the value of introducing consistent protocols for the handling of reports for scams by a wider range of third sector organisations to ensure effective enforcement action is taken; and exploring the operational feasibility of developing a 'single point of contact' or 'one stop model'.

A Streamlining the Landscape Steering Group – led by enforcement bodies – will

be established to review outputs of current on-going work being funded by the Scottish Government to:

- 1) Map the existing scams prevention landscape.

Work has been procured to carry out a review of the existing scams prevention landscape in Scotland, focused on mapping key enforcement, advice and support organisations in terms of their roles and responsibilities and current partnership working. A key output of this work will be citizen flow charts, or user journeys that will demonstrate how people currently access the landscape through different channels and what feedback, if any, they receive after reporting a scam and to who. The work will also culminate in a stakeholder toolkit – including a visual representation of existing channels of communication and engagement between key stakeholders in the scams prevention landscape (see [Figure 6](#)) – focused on helping clarify how different organisations' remits, resources and current package of scams prevention work complement one another. This work is due to complete end of March 2021.

- 2) Research what a single point of contact or one stop shop for scams might offer for both users and practitioners, especially enforcement bodies.

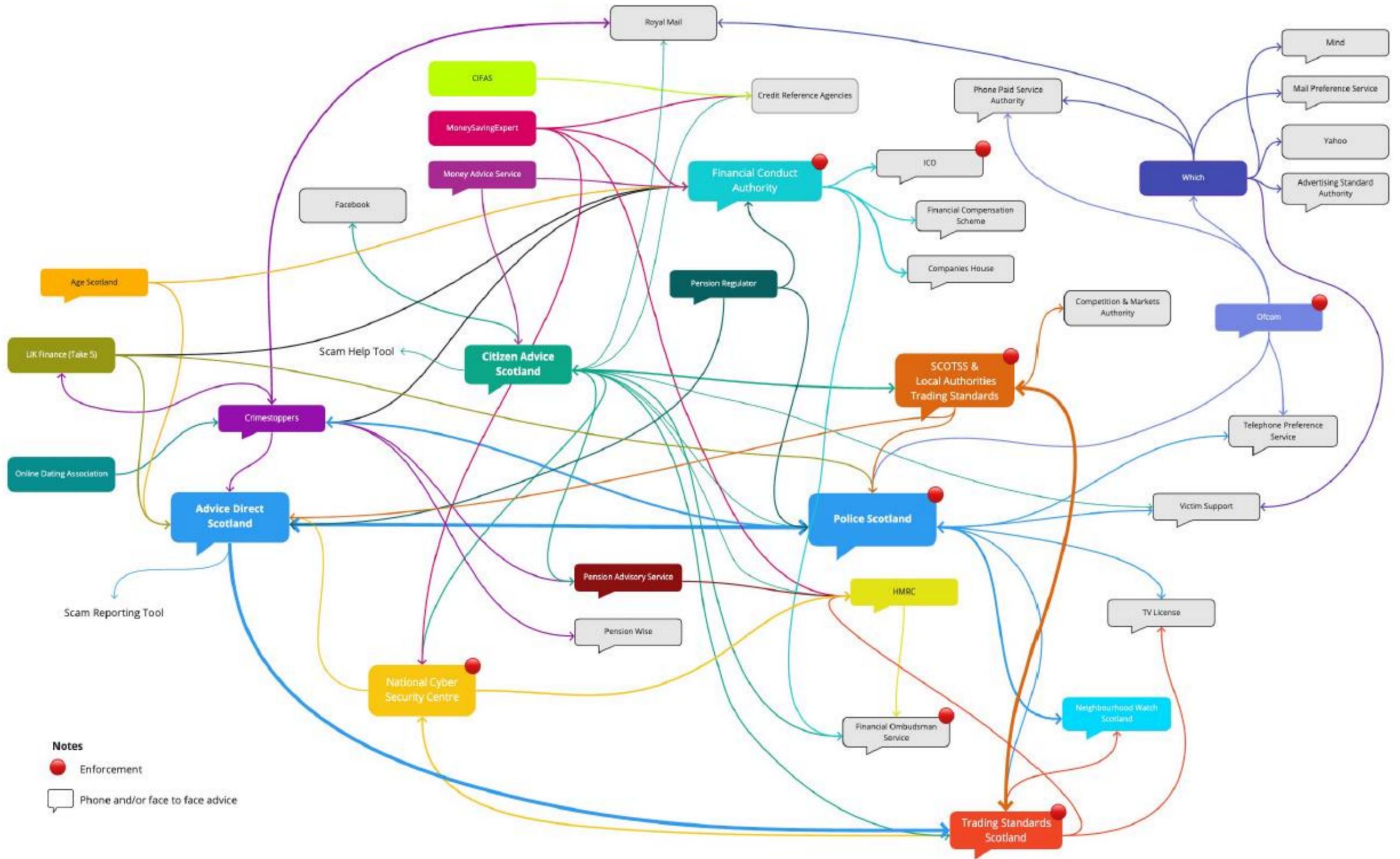
Advice Direct Scotland has been awarded a Scottish Government grant to support preliminary work focused on exploring the practical dimensions of development of a 'single point of contact / one stop shop' model to help inform on-going discussions with partners; and to review their existing advice coding models in order to identify how they might best align

these with enforcement bodies such as Police Scotland and Trading Standards Scotland for purposes of categorising scam incidents and sharing relevant data for action to be taken.

Based on this starting material and the outputs of public engagement work set out further as below, the Steering Group will identify and assess options for improving the landscape overall that align with user needs before making a decision on next steps. All options are considered within scope, but it will be for the Steering Group to develop a work-plan of activities over the coming months that will enable them to then make a decision on the most appropriate strategic course of action.

As part of improving the immediate frontline offer of support available to people, Trading Standards Scotland (TSS) are now working with East Renfrewshire Trading Standards to consider how best to nationalise a new [Financial Harms Toolkit](#) developed by the latter. This is a good example of the important role that local trading standards departments continue to play in not only taking effective, evidence-led enforcement action, but also innovating support packages in response to the needs of their local communities.

Moving forwards, we will continue to engage key representative organisations, such as the Society of Chief Officers of Trading Standards in Scotland (SCOTSS), in order to understand potential implications on local capacity of any changes agreed to by partners to streamline the wider scams prevention landscape.



**Figure 6:** A draft indicative representation of the existing, complex scams prevention stakeholder landscape covering examples of the main organisations involved at both a Scottish and UK level, from enforcement to frontline advice providers. Channels of engagement represented have been informed by desk based research – including online webpage signposting between organisations – and interviews with relevant partners regarding the nature of their work, and relationships with other supporting agencies, bodies and wider organisations. This "map" is not exhaustive, and does not represent the final outputs of the commissioned research currently underway – it is provided for purposes of illustration only at this time.

This will ensure that people living across Scotland have access to standardised information and advice concerning the financial impact of fraud, including signposting to tailored local support services according to where they live.



Figure 7: East Renfrewshire Trading Standards "Financial Harm Tool Kit: A guide to avoid scams"

## Cross-Cutting

### Public engagement programme

A programme of engagement will be developed to increase the impact and effectiveness of strategic interventions across the full user journey of education, awareness raising, and accessing advice and support.

The purpose of this engagement work will be twofold:

- 1) To better understand people's needs and barriers when attempting to report scams and access the right support, at the right time; and
- 2) To identify key knowledge gaps related to scams, including how best to avoid the risk that they pose and what an individual's consumer and citizen rights are if they become a victim; and to tackle the stigma currently associated with scams and the shame or embarrassment felt by those who become victims of this criminal activity.

As part of this work-stream, we will also explore with partners the potential value of taking forward social research to more fully assess key factors that can lead to someone being more susceptible to being scammed, based on personal circumstances. This work could offer a means for further enabling frontline advice services – and enforcement bodies – to create more holistic packages of support, and communications, based on joined up service provision and reflecting a person-centred approach to scams prevention.

### Strategic positioning of scams as tied to a Community Safety and Public Health narrative

Linked to development of a partnership Strategic Communications Plan and wider Strategic Education Action Plan, we will promote key messages that emphasise the broader criminal nature of scams and their impacts in order to develop and **embed a stronger – and shared – mind-set** amongst a wider range of stakeholders and the general public that scams prevention work is intrinsically about questions of security, safety, health and wellbeing.

To complement the Partnership, we will seek to establish an internal Scottish Government Scams Prevention Policy Reference group, to support on-going

awareness raising of how different policies can contribute to reducing the risk of being scammed or the level of detriment experienced by those who are victimised. We will draw on the community safety and public health narrative in order to effectively communicate added value of certain interventions to wider policy outcomes; and vice versa as related to key scams prevention activities; as part of building a more integrated strategic policy approach. We will use this platform to spot new opportunities for cross-policy development and collaboration, including through conducting an internal mapping exercise of existing policies and programmes that contribute to shared outcomes.

Through this group we will engage with cyber resilience, organised crime, safer communities and adult support and protection colleagues, amongst others.

We will use the language and shared outcomes of scams as being tied to community safety and public health narrative as a way of also bridging the gap with other potential stakeholders, so as to

most effectively draw on a wider range of advice, support, and enforcement services. In this way we will further promote a “whole person, whole system” approach to tackling scams and their impacts in Scotland.

### Building Resilience Against Scams

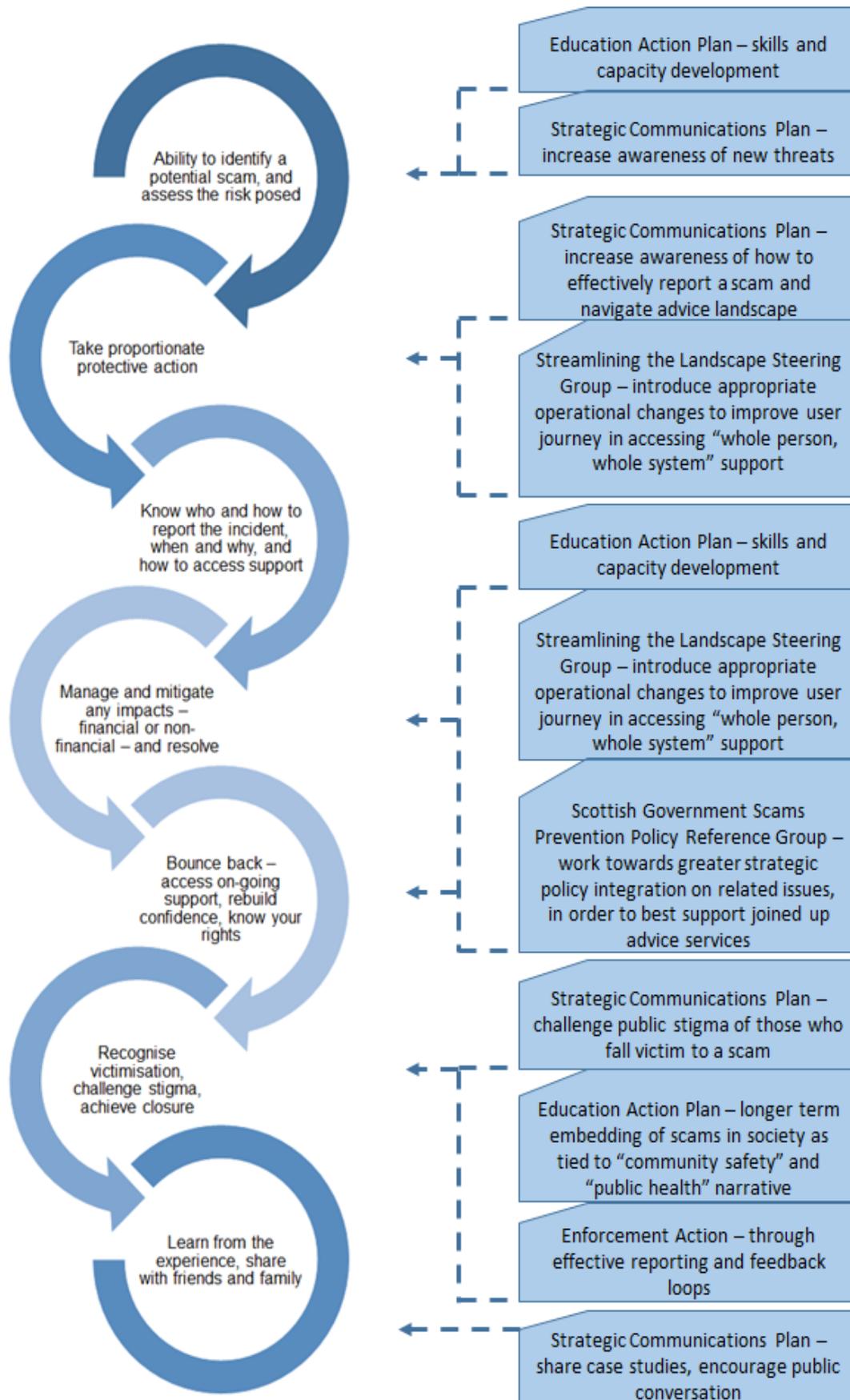
**Figure 8** provides an overview of what we mean when we talk about “personal resilience” in this context, and sets out the contribution of each step we are taking along the way – under the new strategic framework – to build, strengthen and embed this for people across Scotland.

### Wider Policy Landscape

This strategy both supports and is supported by many other government policies and programmes in Scotland – see **Table 3** for some examples.

Scottish Government Policies & Programmes	Strategic Framework for Tackling Scams in Scotland: Three Pillars		
	Prevention & Disruption	Education & Awareness	Enforcement
Serious Organised Crime Strategy	✓	✓	✓
Cyber Resilience Scotland: Strategic Framework	✓	✓	✓
Protecting Public Resources in Scotland: Counter Fraud Strategy	✓	✓	✓
Scotland's Economic Strategy	✓	✓	
Mental Health Strategy 2017-2027	✓	✓	
Adult Support & Protection	✓	✓	✓
Building Safer Communities	✓	✓	
Consumer Advocacy & Advice		✓	

**Table 3:** Wider national policy landscape that supports, and is supported by this strategy.



**Figure 8:** Cycle of individual resilience against scams, and supporting strategic actions that will contribute over time towards enabling people to practice each step

## Monitoring, Reporting & Future Delivery

### 18-24 Months

We will support the new Scottish Scams Prevention Partnership to develop an appropriate approach to monitoring impact over time against the actions set out in this strategy. This is likely to include surveys and focus groups, campaign evaluation reports, evaluation of frontline advice statistics on number of scams reported; as well as wider Scottish Government official statistics, such as the Social Justice & Crime Survey.

We will aim to provide an **initial progress update** in light of the forthcoming development work and key considerations of the Partnership at an appropriate time **within 18-24 months of publication**. This will be used as an opportunity to further clarify, or confirm any further necessary actions agreed by the group or its constituent sub-working groups, to be taken forward in terms of next steps in implementation of the strategic scams prevention framework in practice.

We will also use this point to determine what appropriate future governance arrangements should look like for overseeing on-going delivery of key strategic actions; and/or any appropriate next phase(s) of delivery in implementation and embedding of the strategic framework established under this strategy; up to the three year mark set out for this strategy.

### 36 Months

Reflecting co-ownership of development and delivery of this strategy, the new Scottish Scams Prevention Partnership will oversee a **review of overall progress of strategic actions – and outcomes – by 2024**. The Scottish Government will work closely with the Partnership – providing secretariat functions – to support this. The final outputs of this

evaluation will be presented to Scottish Ministers for consideration.

This review will be achieved using the agreed approach to monitoring and assessing impact that will be developed during the first 18-24 months of delivery, as above. It will include assessing the value added and impact of the soon to-be-developed: Scottish Scams Prevention Partnership; shared Strategic Communications Plan, and associated calendar of events; the Scams Prevention Education Action Plan; partnership led sectoral reviews and identification of pilot intervention pilot projects, within the existing regulatory framework; and any agreed operational changes to streamline the reporting and advice landscape.

**Beyond the lifespan of this strategy**, it is anticipated that the Partnership will continue to conduct longer term monitoring of scams intelligence and outcomes of scams prevention, awareness and enforcement actions in Scotland, reporting on relevant trends and impacts to appropriate bodies to inform policy and operational responses. This work will be supported by both the monitoring and reporting framework to be developed, and appropriate secretariat arrangements.

Following its establishment later in 2021, discussions will also be had with Consumer Scotland to consider what role it may play in this space moving forwards. For example, it may be determined that the Partnership could provide a bespoke annual impact, data and intelligence report on consumer-specific scams and scams prevention work to the new advocacy body to inform its work on assessing wider consumer detriment priorities in Scotland.



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