

Consultation Response

Ref 4118

Response to the All-Party Parliamentary Group on Financial Crime and Scamming inquiry into the impact of fraud and scams on vulnerable people

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Age UK

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, we help more than seven million older people each year by providing advice and support. We also research and campaign on the issues that matter most to older people. Our work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe and secure at home; and feel valued and able to participate.

About this consultation

In September 2018, the All-Party Parliamentary Group on Financial Crime and Scamming launched an inquiry into the impact of fraud and scams on vulnerable people.

Key points

1. Older people are no more or less inherently vulnerable to scams than others; however, some are more vulnerable due to 1) experiencing challenges associated with ageing, affecting their ability to protect themselves, 2) the fact that they are targeted by perpetrators of particular scams, and 3) the disproportionate financial and health impacts of being a victim.
2. Cognitive impairment, social isolation, loneliness and being a previous victim are key causes of individual vulnerability.
3. However, there are occasions when age might be used as a proxy, e.g. for a further check to establish someone's actual vulnerability.
4. Key principles in a shared definition of vulnerability could include 1) an individual's ability to protect themselves, which is affected by their personal characteristics and life situations, 2) the degree of harm caused and the victim's ability to recover, and 3) the complexity of the environment and the behaviour of firms.
5. People's wider environment – particularly the banking and telecommunications systems – are key in creating, increasing or minimising vulnerability. Action should be prioritised on making these environments more secure.
6. More than two-fifths (43%) of older people – almost 5 million people aged 65+ – believe they have been targeted by scammers. Older people are particularly likely to be victims of doorstep scams, pension and investment fraud, impersonation fraud, courier fraud, romance fraud, postal fraud and computer repair fraud.
7. The Government should build on the success of the call blocking pilot and provide further funding to protect more people with dementia in this way.
8. Banks should use customer interactions and data to identify customers particularly at risk, and offer and apply additional protections. They should also offer customers the option of self-declaring their vulnerability.
9. Banks should provide a supportive environment for customers to disclose any illness, such as a diagnosis of dementia, and agree additional protections.
10. Branch closures remove opportunities for customers in vulnerable circumstances to bank safely. Banks should improve the security of alternative channels and ensure customers who lose access to a branch are properly supported.
11. The nomination of a deputy can facilitate greater security against financial abuse, but this process needs to be tightened up with a criminal record check. We are also concerned about the lack of security in the system of appointees.

12. Fears about data sharing hold back local authorities, police and other agencies from working together to protect people from fraud, and need to be addressed.
13. The Government should ensure local Trading Standards services have the resources needed to protect vulnerable residents from fraud.
14. The Government should tackle a range of scams by banning *all* cold call selling; the forthcoming pension cold call ban is welcome but limited and not yet in place.

1. Definition of vulnerability

a) What definition of vulnerability do you or your organisation apply to your customers or clients?

The relationship between fraud, vulnerability and age is complex. To summarise our position: older people are no more or less inherently vulnerable to fraud than others. However, some are particularly vulnerable due to:

- experiencing challenges associated with ageing, affecting their ability to protect themselves,
- the fact that they are targeted by perpetrators of particular fraud types,
- the often severe financial and health impacts of being a victim.

People of all ages and circumstances ages fall victim to various types of fraud and, in that sense, are vulnerable to fraud. However, older people are at higher risk of particular fraud types, e.g. pension and investment fraud, doorstep rogue traders, postal mass marketing fraud, romance fraud, courier fraud, impersonation scams and phone scams such as computer repair fraud. In some cases, this is because fraudsters deliberately target older people. Anecdotal evidence from Trading Standards services suggests doorstep rogue traders offering services such as building, gardening or energy efficiency services target older people living alone. Fraudsters used customer data following major data breaches to target older people with various phone scams.¹

At the same time, we do not consider that 'older' people are by definition vulnerable. Ageing, however, often brings circumstances and challenges that can make people vulnerable in the sense of being less able to protect themselves, e.g. cognitive impairment, health conditions, bereavement, loneliness and isolation. Indeed, we particularly want to highlight cognitive impairment, social isolation and loneliness (as well as previously being a victim) as key causes of vulnerability. Case study 1, below, illustrates some of these vulnerabilities, and Box 1 outlines some key statistics.

Case study 1: Investment fraud

A caller to Age UK's advice line says she is worried about her uncle. He is showing signs of dementia and losing some short-term memory. He has given nearly all his life savings – around £100k – to a bogus wine company. Despite her presenting evidence to him that it is a scam, he says the people are friendly. He has been forgetting to pay bills and his debts are mounting up.

Box 1: Vulnerable circumstances and situations

- Half (47%) of people aged 75+ have a **limiting longstanding illness**.²
- By our mid-80s, around 20% of us have 5 or more **health conditions**.³
- 850,000 people are estimated to be living with **dementia**, of whom 808,000 are aged 65+.⁴
- 5-20% of people aged 65+ have **mild cognitive impairment**, a condition where people have minor problems with mental skills including memory and reasoning.
- Half (49%) of people aged 75+ **live alone**.⁵
- 11% have less than **monthly contact** with family, friends and neighbours.⁶
- 1.4 million people aged 50+ in England – 1 in 12 people – are **often lonely**.⁷

More broadly, our definition of consumer vulnerability considers someone's personal characteristics (e.g. health condition), the life situations they face (e.g. bereavement) and their wider environment. We have discussed the first two above but the commercial *environment* is key to creating vulnerability. In case of scams, the environment is primarily the banking system, as well as telecommunications, i.e. mobile, landline, internet. Weaknesses in these areas result in people being exposed to fraud, so policy interventions should focus on them.

A final element of vulnerability is the *impact* of being a fraud victim. Older people can suffer severe, in some cases life-changing, financial and health impacts. There are cases of people losing their life savings, which they may not have time to rebuild if they have retired from work. Some people lose their home or go bankrupt as a result.⁸ Older people's physical health can deteriorate quickly after being a victim of crime, and they can suffer severe psychological health impacts such as stress and depression.⁹ They may also lose their independence as a result, as illustrated in case study 2.

Case study 2: Impacts on health and independence

An Age UK service user raised concerns about his neighbour, an older woman who lived alone and was the victim of a doorstep scammer. She had vascular dementia and needed help with washing, dressing, cooking, etc. But after being scammed she wouldn't open the door to anyone, leaving her to struggle to look after herself. She deteriorated to such a degree that another neighbour became concerned, and called an ambulance. She then spent over a month in hospital and is now in a care home.

- b) Do you see any concerns with different organisations using different definitions of vulnerability (e.g. law enforcement using a different definition to charities or banks)?

The focus should be on developing a common understanding of the key factors, rather than being overly concerned about detailed wording. A broad definition could therefore include a number of vulnerability factors, such as –

- An individual's ability to protect themselves, which is affected by their characteristics and life situations

- The complexity of the environment and the behaviour of firms – which can mean that people who wouldn't otherwise be considered vulnerable can be considered so in relation to the issue
- The degree of harm caused and the victim's ability to recover

Regulators are increasingly working to similar understandings of the factors in consumer vulnerability, and we want to see similar joint working across regulators and law enforcement agencies in relation to fraud.

In terms of the behaviour of firms, organisations need to recognise the part they play in creating vulnerability, and work to minimise it. For example, banks unintentionally contribute to vulnerability through the provision of customer communications (e.g. text messages) that can be convincingly spoofed or impersonated.¹⁰ So, banks can increase or decrease vulnerability through their actions.

We also draw attention to the new customer reimbursement code,¹¹ currently under consultation, which proposes a new and specific definition of vulnerability for the purposes of identifying customers eligible for reimbursement.

- c) Should age ever be accepted as a factor alone in defining an individual as vulnerable? If so, what factors do you consider in an age-related assessment?

As discussed above, we do not consider older age to equate to vulnerability. However, there are occasions when it might be used as a proxy, e.g. for a further check to establish someone's actual vulnerability, or when considering the potential impact.

As discussed, ageing often brings challenges that can make people vulnerable, and scammers sometimes target older people. Banks should, as far as possible, use these specific circumstances (e.g. diagnosis of a health condition, bereavement, onset of cognitive impairment) to indicate potential vulnerability. Further, banks should data on the age profile of victims of particular scams to identify people at risk and implement additional protections.

A second consideration is the severe financial and health impact of being defrauded for older people. Support for older victims, including after care provided by banks, police and other organisations, must reflect this.

- d) Should medical conditions that directly cause cognitive decline, such as dementia, render a person "vulnerable" upon diagnosis? When a person is suffering from a medical condition what are the factors that need to be taken into account when assessing that person as vulnerable?

The principles of the Mental Capacity Act should be paramount, and therefore a diagnosis of dementia should not mean that someone is automatically and instantly treated as vulnerable. However, we appreciate the need for practical ways to target interventions and a diagnosis of dementia will be an important trigger for offering further support. Banks, for example, will want to find out more about the customer and the support they need to continue to bank safely as independently as possible: but they should not take away their right to make their own decisions where they have capacity to do so.

We welcome the Government's funding for call blocking technology for people with dementia. This has been successful in preventing scams – 99 per cent of unwanted calls were blocked over an 11-month period – and the Government should build on this success and provide further funding.¹²

2. The issue

a) What assessment have you made of the scale of vulnerable citizens/consumers falling victim to fraud and financial abuse?

Bearing in mind that people of all ages can be by a scam, in this section we set out the threat scams pose specifically to older people. More than two-fifths (43%) of older people – almost 5 million people aged 65+ – believe they have been targeted by scammers (although only a small percentage did actually fall victim as a result).¹³ In the context of all crime types, you are 5 times more likely to be a victim of fraud than domestic burglary, and nearly a third (31%) of all crime is fraud.¹⁴

From January to June 2018, consumers lost £92.9m to authorised push payment scams.¹⁵ There were 31,510 cases, meaning the average loss was around £2,950. This hides significant variation; we are aware of cases where victims have lost tens of thousands or more, in some cases their life savings. This figure also excludes frauds on small businesses.

It also hides variation by scam type. For example, victims of impersonation (bank, police or other) scams are more likely to be aged 65+.¹⁶ These scams are particularly difficult to spot, even for people with high levels of knowledge and confidence; a senior banker recently said he wouldn't be able to tell a real text from a fraudulent one.¹⁷ This illustrates the point that consumers can only do so much to protect themselves.

b) What assessment have you made of the kind of fraud and scams vulnerable individuals are more likely to fall victim to?

As discussed above, older people are particularly likely to fall victim to a range of scams. These are outlined below in Box 2, using evidence from a range of sources.

Box 2: Scams particularly affecting older people		
Scam type	Age	Losses
Impersonation fraud	Largest concentration among people aged 65+. ¹⁸	£11,400 average loss in police and bank impersonation scams; £7,500 loss in other impersonation scams. ¹⁹
Postal mass marketing fraud	A typical postal scam victim is 74 years old and living alone. ²⁰	Victims aged 75-79 lose an average of £4,500. ²¹
Investment fraud	Correlation with age – the older someone is, the more likely they are to become a victim. ²²	£32,000 average loss ²³

Pensions scams	Target pension holders aged 45-65. ²⁴	£91,000 average loss ²⁵
Romance fraud	Of reports to Action Fraud, the largest proportion (20%) are by people aged 51-60. ⁱ A further 20% of reports are by people aged 60+. ²⁶	£10,000 average loss ²⁷
Courier fraud	Of reports to Action Fraud, the largest proportion (44%) are by people aged 80-89. ⁱⁱ People aged 60+ make up 91% of reports. ²⁸	
Computer repair fraud	Average age of victim is 62 ²⁹	£600 ³⁰

3. Consent

- a) What basis of consent do you or your organisation use to protect vulnerable customers/clients from financial abuse?
- b) Do you notify your customers/clients if you consider them to be vulnerable?
- c) Should we accept, without evidence, a person who self-declares to be vulnerable? Do we need safeguards?
- d) Do you have any examples of where self-declaring vulnerability (as above) has worked?

We do not expect large numbers of older people to self-declare as vulnerable. Evidence from the energy sector shows how some older people eligible for their supplier's priority service register resent being seen as vulnerable and do not take up the offer.³¹ However, we are aware of at least one high street bank that allows people to self-declare their vulnerability to scams and ask for additional protection. Those people who want to do this – even if relatively small in number – should be able to do so and all banks should offer this facility.

Given that only a small proportion of customers will self-declare as vulnerable, and that some people may not recognise themselves as vulnerable, the onus should be on firms to pro-actively look for signs on vulnerability in their customers' accounts.

4. Transitional vulnerability

- a) Do you believe that 'transitional vulnerability' such as a bereavement, loss of a job, first time living away from home, etc., can make an individual vulnerable to financial crimes or scams?

ⁱ These data are provided by the City of London Police and are based on 4,327 crime reports to Action Fraud during the period 01/07/2017–31/07/2018. They only reflect those frauds that victims have reported, and so may not represent the entirety of romance fraud victims.

ⁱⁱ These data are provided by the City of London Police and are based on 2,022 crime reports to Action Fraud during the period October 2015–September 2017. They only reflect those frauds that victims have reported, and so may not represent the entirety of courier fraud victims.

- b) Where a person has experienced ‘transitional vulnerability’ should we treat them as vulnerable?
- c) If we treat them as vulnerable, what judgement can be applied as to when the period of vulnerability is at an end?
- d) Do you have example of best practice or where an organisation has protected individuals from transitional vulnerability?
- e) Do you think loneliness can be a reason for transitional vulnerability? If so, what do you think organisations can do to protect individuals who are vulnerable due to loneliness?

We believe that certain life events can make people especially vulnerable to scams. However, there is a risk of getting bogged down in defining when a period of transitional vulnerability begins and ends because this will be different for each individual. The important point is that banks and other organisations should use observable life events of their customers to inform their assessment of how at risk that person is and increase protections accordingly and reimburse more readily.

For example, scammers often prey on people who are socially isolated or lonely. The OFT found that chronic scam victims are typically older, socially isolated and/or in declining mental health.³² In polling, of those older people targeted by fraudsters, a quarter (27%) of single people responded to the scam, compared to a tenth (9%) of their married counterparts.³³ Bereavement and separation can lead to isolation or loneliness and these are life events that banks can observe and respond to by:

- *offering* extra protections, e.g. payment delays, third party checks.
- *applying* extra protections, e.g. extra payee checks and warnings.

The question of when this heightened vulnerability ends and whether the extra protections should be removed is secondary, and in most cases should be a matter of discussion with the customer.

5. The collective response

- a) Does society listen to and adequately address the needs of those who are vulnerable?

Society does not adequately address the needs of people who are vulnerable to fraud. Too many people who experience cognitive impairment, or are lonely, isolated or ill, lose life-changing amounts of money, and lose their health and independence. Broadly speaking, there are ways in which society could reduce these losses, including:

- banks having improved protections for customers,
- reimbursement for customers who could not have protected themselves,
- greater consumer protection enforcement through adequately-resourced local authority Trading Standards services; FTE staff decreased by 56 per cent between 2009 and 2016,³⁴
- a better joined-up local response, with adult social care, Trading Standards, police, the voluntary sector and other agencies working better together,
- call blocking technology provided to more people with cognitive impairment,
- a stronger and more consistent police response and more deterrence through greater prosecution,

- stronger Government action to tackle telephone-based scams by banning all cold calls; the forthcoming pension cold call ban is welcome but limited, and not yet in place,³⁵
- better support for a larger number of scam victims, thereby minimising harm and preventing further losses.

It is also important to send a strong message to society and law enforcement agencies that even what might appear to be a relatively low value fraud still needs to be investigated and treated particularly seriously if the victim is vulnerable. This would improve reporting and enforcement rates. We are pleased that the Law Commission will be considering whether age should be considered a relevant characteristic in hate crimes and we note that the Sussex PCC has argued that frauds specifically targeted at older people should be regarded as hate crimes.³⁶

b) Are current services to vulnerable people too generic, do we need to move to a more tailored flexible model?

We do need a more tailored flexible model. We understand that this is difficult, but support movements such as the banking industry's vulnerability task force as a way of sharing and disseminating best practice.

An example of how services can be generic is the banks' practice in relation to branch closures. The protocol talks about ensuring alternatives for 'regular users', but regular users are defined by some banks as rigidly as someone who has been in to the branch every week for the past 23 weeks, taking no account of the personal characteristics of that customer (for example a very long-term customer). As a result, they may be more exposed to risk when making payments. Indeed, in-branch banking reduces the opportunity for some kinds of scam (e.g. bank impersonation scams) and facilitates effective protections (e.g. the Banking Protocol³⁷). For example, an older man we spoke to for a recent report said:

'If you go into a branch, if you can find one, and you say "Look, I'm getting a bit doddery and I now want any transaction that I make to go past my daughter or whoever as a second opinion", I think that's what they should do and if they don't do that then it becomes their responsibility.'³⁸

Banks need to 1) provide better physical alternatives for the 'last branch in town', 2) radically improve the security of phone, mobile and online banking channels, and 3) ensure that customers who move from face-to-face to other forms of banking have the required skills and knowledge.

c) Are there sufficient safeguards in place to protect those who lack capacity and are subject of a court order of protection, what more could and should we do to protect them from fraud and financial abuse?

The appointment of a deputy arguably provides greater security than appointing someone as an attorney. The requirements for annual supervision and reporting, as well as a security bond mean, that issues and concerns can be picked up pro-actively. However, there is no requirement for non-professional deputies to have any form of criminal record check before they are appointed. While a criminal conviction should not necessarily be a

bar to becoming a deputy, such a check would deter unsuitable people and indicate certain relevant convictions. If the role were to be included in regulated activity for adults then Disclosure and Barring Service referrals could also be made where they had been found to have seriously failed in their duties.

The barriers to prevent deputies who have previously had deputyship revoked due to a failure in their duties reapplying to become a deputy or attorney require greater transparency. This would reassure the public, and those planning such arrangements, that unsuitable people will be prevented from managing the affairs of individuals who may in the most vulnerable circumstances.

We also note that the DWP accepts 'appointees' to collect and manage state pensions and benefits on behalf of people who are unable to manage their finances due to disability or cognitive impairment. These fall outside all the protections offered by either a deputyship or a power of attorney and we are concerned that there are insufficient protections – such as reviews of personal arrangements – against abuse.

d) **What initiatives or measures has your organisation put in place to protect vulnerable citizens and consumers from financial crime?**

Age UK is piloting a Scams Prevention and Victim Support Programme which is funded by the City Bridge Trust and runs until February 2019. Four local Age UKs in six London boroughs are working in partnership with Action Fraud, local Trading Standards services and other agencies to support over 2,100 older Londoners. The programme has three core activities: awareness-raising sessions for older people, friends and family; one-to-one sessions for older people who are vulnerable and at risk of scams; and specialist one-to-one support sessions for older victims. For more information, contact Age UK.

In addition, many local Age UKs offer their own scams programmes. Age UK provides free information and advice to older people and their families on staying safe, including through our *Avoiding Scams* guide.³⁹

6. Data sharing and joint working

a) **Do you find that in protecting a vulnerable person from fraud or scams that there are data sharing hurdles or barriers to overcome? If so what are the barriers?**

We are concerned that banks, local authorities, police and other agencies are in some cases so worried about breaching data protection rules that they don't share information regarding people at risk of scams, or victims, meaning that person misses out on protection or support.⁴⁰ The Information Commission's Office and the Joint Fraud Taskforce should continue to clarify the rules to give these agencies confidence to share information to support vulnerable people.

This concern about sharing information about vulnerable customers is in marked contrast to very weak data protection in relation to whole groups of customers. There have been a number of major data leaks in the last couple of years (e.g. Facebook, Talk Talk, Equifax). Banks, telecoms companies and other organisations must urgently ensure their data security is sufficiently strong, and regulators should penalise companies for leaks in a way that raises standards.

- b) What examples of best practice are there in collaborating across different organisations and sectors to protect vulnerable consumers and citizens from financial abuse and fraud?

Cifas provides an important service sharing data across sectors to reduce fraud, including a specific service for protecting vulnerable people.⁴¹ We support movements such as the banking industry's Vulnerability Taskforce as a way of sharing and disseminating best practice.⁴² The Association of British Insurers has also carried out work on vulnerability.⁴³ The Competition and Markets Authority has a programme of work on vulnerable consumers.⁴⁴

However, it is vital that promising initiatives such as the Vulnerability Taskforce are not one-off exercises but form the basis of ongoing work, with regular reviews of effectiveness.

- c) How could collaboration, inter-agency and cross-agency work in this area be improved?

The Joint Fraud Taskforce (JFT) was convened by the Home Office in 2016 to improve collaboration between the Government, banking industry and law enforcement. The JFT has led some important and effective pieces of work, including the Banking Protocol. Following its recent review, the JFT should make public commitments to action and longer-term strategic goals, and be held accountable for progress.

- ¹ <https://www.dailymail.co.uk/news/article-3299582/Hacking-conmen-target-pensions-Gangs-use-details-stolen-cyber-attacks-TalkTalk-14-firms-prey-cash-rich-elderly.html>
- ² The estimate is for the UK, based on Great Britain data from the General Lifestyle Survey 2011, Office for National Statistics, 2013
- ³ Age UK and University of Exeter Medical School: *The Age UK almanac of disease patterns in later life* (2015)
- ⁴ The Alzheimer's Society fact sheet 400, https://www.alzheimers.org.uk/download/downloads/id/3416/what_is_dementia.pdf accessed 28/03/17
- ⁵ General Lifestyle Survey 2010, table 3.3 (GB), ONS, 2012
- ⁶ Loneliness, Social Isolation and Living Alone in Later Life, C. Victor et al., 2003
- ⁷ <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/loneliness/loneliness-report.pdf>
- ⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/720772/scale-and-nature-of-fraud-review-of-evidence.pdf
- ⁹ <https://www.ageuk.org.uk/documents/en-gb/for-professionals/consumer-issues/age%20uk%20only%20the%20tip%20of%20the%20iceberg%20april%202015.pdf?dtrk=true>
- ¹⁰ <https://www.thisismoney.co.uk/money/beatthescammers/article-6232871/Why-never-trust-text-message-bank-lose-life-savings.html>
- ¹¹ <https://appcirmsteeringgroup.uk/consultation/>. NB, Age UK is represented on the steering group that has developed this draft reimbursement code.
- ¹² <http://www.nationaltradingstandards.uk/news/successful-project-blocks-over-100000-nuisance-calls/>
- ¹³ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/rb_mar18_applying_the_brakes.pdf
- ¹⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingmarch2018#no-change-in-the-most-common-types-of-violent-crime>
- ¹⁵ <https://www.ukfinance.org.uk/criminals-steal-500m-through-fraud-and-scams-in-the-first-half-of-2018/>
- ¹⁶ http://newsroom.barclays.com/r/3641/major_new_research_reveals_who_is_really_at_risk_from_scams
- ¹⁷ <https://www.thisismoney.co.uk/money/beatthescammers/article-6232871/Why-never-trust-text-message-bank-lose-life-savings.html>
- ¹⁸ http://newsroom.barclays.com/r/3641/major_new_research_reveals_who_is_really_at_risk_from_scams
- ¹⁹ http://newsroom.barclays.com/r/3641/major_new_research_reveals_who_is_really_at_risk_from_scams
- ²⁰ <https://www.nao.org.uk/wp-content/uploads/2016/12/Protecting-consumers-from-scams-unfair-trading-and-unsafe-goods.pdf>
- ²¹ <https://www.nao.org.uk/wp-content/uploads/2016/12/Protecting-consumers-from-scams-unfair-trading-and-unsafe-goods.pdf>
- ²² <https://www.fca.org.uk/publication/research/guan-study-understanding-victims-investment-fraud.pdf>
- ²³ <https://www.fca.org.uk/news/press-releases/inside-mind-scammer-tactics-investment-fraudsters>
- ²⁴ <https://www.fca.org.uk/news/press-releases/regulators-warn-public-pension-scammer-tactics-victims-report-losing-average-91000-2017>
- ²⁵ <https://www.fca.org.uk/news/press-releases/regulators-warn-public-pension-scammer-tactics-victims-report-losing-average-91000-2017>
- ²⁶ City of London Police/Action Fraud, 2018
- ²⁷ <https://www.cityoflondon.police.uk/advice-and-support/fraud-and-economic-crime/nfib/nfib-news/Pages/One-victim-reports-dating-fraud-every-three-hours-according-to-the-latest-national-figures-from-City-of-London-Police.aspx>
- ²⁸ City of London Police/Action Fraud, 2018
- ²⁹ <https://www.bbc.co.uk/news/technology-40430048>
- ³⁰ <https://www.bbc.co.uk/news/technology-40430048>
- ³¹ https://www.ofgem.gov.uk/sites/default/files/docs/2013/07/vulnerable-consumers-and-the-priority-services-register-june-2013-%28bt%29_0.pdf
- ³² Research on impact of mass marketed scams: A summary of research into the impact of scams on UK consumers, OFT, 2006
- ³³ Kantar TNS Research Express polling for Age UK, June/July 2017 – sample of 1,367 people aged 65+ in GB
- ³⁴ <https://www.nao.org.uk/wp-content/uploads/2016/12/Protecting-consumers-from-scams-unfair-trading-and-unsafe-goods.pdf>
- ³⁵ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/safe-at-home/age_uk_response_to_proposed_pensions_cold_call_ban.pdf
- ³⁶ <https://www.thetimes.co.uk/article/swindling-the-old-now-a-hate-crime-62kcb5fqr>
- ³⁷ http://news.cityoflondon.police.uk/r/1054/uk_finance_banking_protocol_prevents_25m_in_fra
- ³⁸ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/rb_mar18_applying_the_brakes.pdf
- ³⁹ https://www.ageuk.org.uk/globalassets/age-uk/documents/information-guides/ageukig05_avoiding_scams_inf.pdf
- ⁴⁰ Home Office Seminar Report, Protecting Older People from the Effects of Crime, June 2018
- ⁴¹ <https://www.cifas.org.uk/services/protecting-the-vulnerable>
- ⁴² <https://www.ukfinance.org.uk/implementing-the-vulnerability-taskforce-principles-and-recommendations/>
- ⁴³ <https://www.abi.org.uk/news/news-articles/2017/11/abi-publishes-guide-to-help-firms-identify-and-support-vulnerable-customers-in-the-long-term-savings-market/>
- ⁴⁴ <https://www.gov.uk/government/publications/vulnerable-consumers>