



Chris Bell
Service Delivery Director
Fraud and Cyber Crime Reporting & Analytics

(By email only)
Rt Hon Stephen Timms MP
Chair, Work and Pensions Committee
House of Commons

Dear Sir,

Thank you for your letter of the 11th of May 2021 to Commander Blackburn raising your concerns in relation to pension scams and specifically a case relating to Dalriada Trustees.

I have since reviewed the questions outlined in the letter, and the supporting information you attached in relation to the Dalriada Trustees case. Please find below a response to the points raised.

1. Dalriada Trustees case

The reports submitted by Dalriada Trustees have been reviewed and, while I cannot provide you with specific details relating to these reports, I can advise that disruption activity has taken place on the telephone numbers taking them out of operation and reducing the opportunity for the fraudsters to victimise others. In addition, the reports submitted by Dalriada Trustees, while themselves not meeting National Crime Recording Standards, are being considered as part of a case review of linked crime reports with the aim of disseminating this to a Law Enforcement Agency for Pursue (criminal investigation) action. This is the unique benefit that Action Fraud delivers, every report helps to build a rich intelligence picture of fraud and cyber offending across England, Wales and Northern Ireland.

2. How such cases should be handled?

Our advice is for victims of fraud and cybercrime to continue to report into Action Fraud. Action Fraud provides a central analysis function which enables fraud and cybercrime reports from across the country to be linked through analysis. As has been outlined above, no report is wasted; it will be used to enhance and inform the development of other cases; to take disruption action against the enablers of fraud; to support the development and delivery of Protect campaigns raising wider public awareness of the methods employed by fraudsters; and, to allow information to be passed to forces of victims in their area who may benefit from additional support.

We recognise that the service needs to continually evolve and develop to provide the best possible service to victims.. To this end we are in the process of procuring a new and improved service (Next Generation). The strategic objectives of the Next Generation Service are to:

- Improve victim experience and satisfaction
- Lead to better criminal justice outcomes
- Prevent crime and reduce harm
- Contribute to an improved understanding of the threat from serious and organised crime
- Improve business and systems interoperability and align with national programmes

In terms of existing barriers to taking urgent action, the primary challenge is of demand versus capacity. Crimes reported into Action Fraud have risen by 34 percent in the past four years, with the last financial year recording a 28 percent increase on the previous year. This rising volume of demand is against a backdrop of reduced resourcing across the whole of policing. We are working closely with the Home Office, and other agencies, and building greater capacity and capability across policing. This is welcomed.

3. Reforms that would assist improve our responsiveness

We are committed to delivering the best possible service to victims of fraud and recognise that this can only be achieved when we work with other organisations. We work closely with the pension industry and The Pensions Regulator supporting pension providers with reporting fraud. In line with this, our ask around reforms would be as follows and outlined in the Work and Pensions Select Committee;

- Know Your Customer (KYC) regulation around use of telecommunications services and purchase of domains, particularly those that mimic company names.
- More effective call blocking and other technical solutions to prevent misuse of telecoms services by the sector.
- While the current scope of the Online Safety Bill includes user-generated content it excludes advertisements and cloned websites. This leaves a gap in the protection provided for the public. Ideally, there would be wider reaching legislation requiring a duty to protect and/or corporate criminal liability for failure to prevent across all online and telecommunications enablers.

I hope that this clarifies the circumstances around the issues you raise on the specific Dalriada Trustees case and your wider service and reform questions.

Finally, we welcome your scrutiny and feedback as it assists our endeavours to continually improve the service to victims of crime. I would be happy to arrange a meeting to discuss the contents of this letter or other matters regarding this case or the service if that would be of assistance.

Yours sincerely,

A small, square, grayscale image of a handwritten signature. The signature is written in a cursive style and appears to read 'CBell'.

Chris Bell
Service Delivery Director
Fraud and Cyber Crime Reporting and Analytics
City of London Police



Work and Pensions Committee

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From the Chair

Commander Clinton Blackburn
National Coordinator for Economic Crime
City of London Police

11 May 2021

Dear Commander Blackburn,

Following the Committee's report on pension scams, I have been made aware of an active scam, reported to both Action Fraud and City of London Police, but on which no urgent action appears to be being taken.

Dalriada trustees are professional pension trustees often appointed to schemes by the Pensions Regulator where members have already been the victim of a pension scam. Dalriada has reported that secondary scammers are using a Vodafone number to target these scam victims by impersonating Dalriada.

Dalriada tell us that they have reported this to Action Fraud, City of London Police, and PSNI. All three have said that they will not take urgent action. At the same time, Vodafone says that it cannot act without a report from the police. As a result, the scammers are able to continue to operate.

This is not an isolated case and it is a worrying trend we raised in our report *Protecting pension savers—five years on from the pension freedoms: Pension scams*.

I would be grateful if you could:

1. Look into this case as a matter of urgency?
2. In due course, outline how cases such as this should be handled in a best-case scenario under current circumstances, and explain to us what barriers there are to taking urgent action?
3. Set out for us any legislative or organisational changes which would improve the response to these types of scam.

I have attached my correspondence with Dalriada Trustees on this case.

Yours sincerely,

Rt Hon Stephen Timms MP
Chair, Work and Pensions Committee