

Financial Abuse and Safeguarding:
NCL SAB workshop findings report

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There is strong evidence that financial abuse of adults with care and support needs is pervasive. It was the 2nd most prevalent 'primary' form of abuse reported in 2021-22 in NCL and features in 13% of SARs, it is also identified as a contributory factor in other forms of abuse, particularly physical abuse, discriminatory, psychological and emotional abuse and domestic abuse.¹ During the pandemic our partners reported the level and complexity of financial abuse rose locally. Too often this resulted in people with care and support needs being left without financial security and unable to meet their basic needs, including people specifically targeted for financial/ material abuse because of their disabilities or social isolation (often referred to as 'Mate Crime'). Given concerns regarding the growing cost of living, many SAB partners felt it was important to consider, collectively, how well we identify and respond to financial abuse by family members, friends or those in a position of trust (e.g. with power of attorney).

On the 21st June 2021 the NCL SABs hosted an on-line workshop for practitioners from across all 5 boroughs. There was representation from Mencap, DWP, Age UK, trading standards, Police officers, social workers, community and hospital-based health practitioners, local authority finance officers and deputyship teams. 97 people registered interest in the workshop and 77 attended the session, with a satisfaction rating of 4.7 (out of 5).

During the workshop participants watched a recording by Barnet SAB's expert by experience who spoke of the harm caused to him by his mother's verbal and financial abuse, they also heard from [Surviving Economic Abuse](#) about existing and new powers to tackle this form of abuse introduced in the Domestic Abuse Act 2021. The National Trading standard team talked about the work they do responding to financial abuse, sharing lessons learnt about the need for clear messages and consistent reporting lines. Age UK also provided a case study illustrating the impact that raising concerns of this nature can have on trusted relationships and why it is so crucial that enquiries are responsive to the adult at risks' situation and desired outcomes. The attendees then broke into workshops to explore the three key areas detailed below.

1: Are current mechanisms to identify intra-familial financial abuse robust and well understood across agencies?

Practitioners reviewed the case studies detailed at appendix A² to explore the questions posed to SABs by an all-Parliamentary task force,³ namely:

¹ National SAR Analysis [2020] LGA.

² These case studies are fully anonymised to enable wider dissemination beyond this report, for example through discussion at practitioner team meetings or within workforce development training and events.

³ <https://www.fvtaskforce.com>, see https://80162760-26bc-4062-be5a-3322b8afa67b.filesusr.com/ugd/2c5374_1340b05c9a874b11adc0a3b24ed0aa69.pdf

- what might be holding back professionals from having difficult conversations when concerns first arise?
- what are the strategic weaknesses in the current responses which need to be addressed?
- what might good practice that can be promoted by SABs look like?

Appendix A also includes more detailed reflections from practitioners on elements of good practice and suggestions for further action which could have led to better outcomes in each of the cases. This is to reflect the feedback from those taking part in the workshop, who found exploring the cases within the multi-agency environment provided clarity on actions and powers of other partner agencies, helping to ‘fine-tune skills needed and provide rationale for revising local policies’.

Prior to the workshop partners report that audit activity locally identified a common barrier was the perception that financial abuse causes less harm than other types of abuse, particularly if the adult at risk lacks (or is assumed to lack) capacity in relation to financial matters. This is not what research found.⁴ In 2020, BSAB conducted a survey to review adults with learning disabilities’ experience of financial abuse, the impact this had and whether they felt responses to that abuse were robust. Almost all those surveyed recognised scenarios as abusive, 21% also reported they had experienced it yet very few (1 in 6 people) had reported this to statutory services. Too few knew who they could speak to or what to expect as a response. In addition, a person’s additional support needs or vulnerabilities often mask the true extent of financial exploitation and abuse. For example, people with mental health needs and problematic drug and alcohol are often in highly vulnerable situations. They are at greater risk of homelessness. They may be more isolated, have fewer supportive social networks and have greater exposure to manipulative and violent individuals. Their mental health needs and problematic drug and alcohol use may increase dependency, impair decision making and make the person more susceptible to coercive control.⁵

During the workshop practitioners reported a lack of confidence (average 2.9/5) in responding effectively to financial abuse concerns when this was occurred within family or ‘friendship’ groups. Often adults at risk of exploitation may not recognise the risk identified by practitioners, as reported in the Alice case study. Similarly, it is not always well understood when borrowing money or accepting this from an adult with care and support needs may amount to abuse (a factor in both case studies). The inclusion of a definition of economic abuse within the Domestic Abuse Act 2021, (namely, ‘*any behaviour from person A that has a substantial and adverse effect on person B’s ability to acquire, use or maintain money or other property or obtain goods and services*’)⁶ should assist, but this will need to be widely publicised so that public and practitioner awareness grows.

Undoubtedly, there are greater layers of complexity inherent in these situations resulting in perceived conflict between respecting the adult at risk’s wishes in line with making safeguarding personal and partners legal powers to investigate, gather evidence and take

⁴ See ‘Financial Abuse of People Lacking Mental Capacity: A Report to the Dawes Trust’ G, Dalley, 2016 available : <https://bura.brunel.ac.uk/handle/2438/15255>

⁵ Finding from Lincolnshire SAB’s thematic review into financial exploitation, available at:

<https://www.lincolnshire.gov.uk/downloads/file/5075/lsab-executive-summary-sar-thematic-review-financial-exploitation>

⁶ 1(4) Domestic Abuse Act 2021

action to stop abuse. Practitioners attending the workshop reported often feeling powerless to intervene if the adult experiencing abuse does not want to escalate concerns to a safeguarding or police enquiry (as in Edward's case). It was noted that Barnet Council are currently undertaking a project regarding social care debts and debt recovery options. Enfield SAB is also completing a deep dive into poverty (including those who have assets, but are considered 'cash poor' and whether this acts as a barrier to accessing social care advice and support. Both these projects offer opportunities to further inform policy development in this area of practice.

There is also scope for learning from good practice tackling domestic abuse, particularly in respect of working directly with perpetrators/those causing harm. Numerous research studies and project evaluations report the positive impact of working with perpetrators on reducing patterns and severity of domestic physical or psychological abuse. With those forms of domestic abuse, even if subsequent harm is reported, the work done with perpetrators is relevant to decisions to escalate the nature of interventions, including through criminal sanctions. In addition, practitioners highlighted the positive outcomes from the use of Family Group Conferences that is often used by Camden practitioners within safeguarding enquiries.⁷ Given the complexity in understanding the level and nature of this type of abuse and the dynamics and importance of relationships to the adult at risk, proposed that this model could be a highly effective way to address concerns with the family members involved and/or eliciting the support or wider family or social networks in prevention and protection plans going forward.

Recommendation: SABs and partner agencies should consider how to adapt lessons learnt from physical and psychological domestic abuse, particularly direct work with perpetrators, to their approach when responding to financial/ economic abuse. In doing so, they should explore the benefits of a Family Group Conferences.

Similarly, discussions during the sessions demonstrated a divergence of opinion on whether s42 safeguarding processes would be necessary or if alternative risk management processes might be relevant. Case discussions demonstrated the added value of using a multi-agency approach to gather information, complete enquiries and put in place effective safeguarding plans. This also highlighting the need for alignment across different risk management processes (for example, Alice's case could trigger consideration under s42 safeguarding processes, MARAC and the modern slavery process). Others (e.g. debt recovery officers, deputyship team) commented on the relevance to the work they do when responding to financial abuse concerns and how they could support the delivery of more effective safeguarding plans, but were often overlooked in favour of more traditional criminal justice pathways.

Recommendation: SAB and partner agencies should consider, as part of any revision of the Pan London Safeguarding Adults policy, providing guidance to practitioners of the value a multi-agency approach where financial/economic abuse is a feature in family or social relationships and clarifying or aligning the s42 duties with other risk management

⁷ More information, including for families and friends is available at:
<https://www.camden.gov.uk/documents/20142/1195356/asset.pdf/7438043a-3de4-f94f-8a4d-0c9d19e1276e>

processes. This could draw on the enablers/ barriers to good practice identified by practitioners during the workshop as set out below.

Enablers to good practice:

- Understanding the legal duties to refer for multi-agency enquiry and protection plan, even without consent, where there is a persistent/ high risk or wider risk to the public.
- Understanding the roles and responsibilities other partner agencies may have to support information gathering and the delivery of protection plans, including civil litigation processes for debt recovery and restitution.
- Being open to challenge regarding assumptions of a person's capacity to recognise risk or to protect themselves from harm arising from financial abuse.
- Adopting trauma informed, safe enquiry principles and an expectation that financial abuse concerns will be discussed at a face-to-face meeting with the adult at risk. Training on the delivery of trauma informed practice/services should be offered more widely (i.e. not limited to clinical services), including for housing staff, DWP and voluntary sector organisations who are often the first responders to safeguarding risks.
- Access to independent advocacy or IDVA support for the adult at risk to enable a trusted relationship to develop. Advocacy should be available in a timely manner and clear guidance on how/ when to refer.

Barriers to good practice:

- Lack of knowledge regarding economic abuse as a form of domestic abuse.
- Lack of practitioner confidence to speak directly to the person causing harm and provide clarity on what action might be taken if economic abuse continues.
- Confusion regarding most appropriate risk management forum to discuss financial abuse, particularly if this is linked to family/ intimate relationships and potential domestic abuse (where MARAC might be a more appropriate forum) or anti-social behaviour, modern slavery concerns (where community safety risk management panels may already be involved).

2. How do we encourage greater emphasis on prevention?

Within the [London Multi- Agency Safeguarding policy](#) there are mechanisms in place to report scamming and procedures for the police and trading standards to investigate. Likewise, there is clarity about how to report and who will lead on investigations where financial abuse is reported to have occurred by people providing paid care within registered providers or by professionals appointed to manage financial affairs as power of attorney or as deputies. For this reason, these aspects of financial abuse (though we recognise the severity of the impact) were outside of the scope of this work.

Practitioners at the workshop reported a lack of public and professional awareness of the risks and nature of economic/ financial. They suggested as a starting point sending clear, but careful messages that it needs to be reported. The right messaging is vital and must reflect what we already know about why people are reluctant to report concerns, for example fear of criminal sanctions against family members and/or a breakdown in relationships that matter to the adult at risk. Equally, adults at risk (and professionals) report fear of reprisals or conversely that too little action will be taken meaning that they fear reporting this form of abuse might put them at greater risk.

The Importance of diversity and difference in key messages was also considered with practitioners recommending that SABs engage from the start of any 'product design' with our community or faith group leaders to take advice about the best formats and use of language so ensure this work has a wide and impactful reach. This will build trust and help us all to understand issues from different cultural perspectives.

The group **recommend** that for **Public facing communications**:

- Information is consistent, but tailored to for different modes of delivery (given the need to reach difficult audiences, some of whom may experience digital exclusion) so consider social media, but also leaflets/ posters and local radio campaigns, TV adverts at GP's. Consider using recordings tailored to specific disabilities. For example, Camden's learning disabilities team use You Tube videos with clients to explore issues in an accessible way. No one size fits all!
- Leaflets and posters need to be simple, (i.e. easy to read) and accessible- so available in places like job centres, signposting to where to go if concerned and what to do. Consider including a QR code on publicity in the public domain for vulnerable clients who want to find out more information without the person causing harm knowing.
- Think carefully about the language used, 'safeguarding' isn't always understood by everyone as a positive term so talk about 'staying safe' or providing a safe space to talk about money worries.
- SABs should consider developing guide similar to the 'The Little Book of Scams'. It is important that professionals from across banks, financial assessment/ deputyship teams, housing officers/ social workers or health professionals (including district nurses) have something simple to grab off the shelf that can be left with people. This could also be given to other professionals or trusted people in the adult's life who may find it easier to get access to speak to an adult at risk where they have been deliberately isolated by someone seeking to abuse their position or control.⁸
- Social media could be used for raising awareness but this will likely have more impact if it is case study and solutions focused. For example, approach from the angle of giving information about the options available to clients rather than just a focus on the risk. "Did you know if you have any money worries you can speak to us about your options, or do x, y and z" "If you need to get money out, instead of giving someone your card, there are lots of ways we can help. Here are the options...." to help clients find different ways to do things.

Likewise, the group felt **communication with practitioners** was needed to help them ask the right questions and, where necessary, provide effective challenge. They **recommend**:

- SABs develop some key messages for professionals to use with clients, learning from the trading standard's 'take 5' simple, but clear message to prevent abuse through scams.

⁸ For more info on the signs of grooming see: <https://www.anncrafttrust.org/signs-of-grooming-in-adults-what-to-watch-out-for/>

- Information to practitioners should encourage professional curiosity. Talking about money isn't easy, but drawn on successful campaigns (e.g. 'You are not alone' re Domestic Abuse and 'lets talk money'⁹). Key messages for our workforce include:
 - Importance of gathering info from wider networks who know the adult at risk.
 - When presentations/ concerns would warrant a face-to-face appointment and what information to share.
 - Clearer guidance on the role of partnership working to reach a vulnerable client who may have been isolated deliberately, so it is understood this should be a shared responsible with mutual gain because it is will make it much more likely the adult is safe and well.
 - DWP has noted that in some cases almost every interaction with a client involves someone else attending with them. Often work coaches/ staff don't feel comfortable to ask why this other person is there, even if it should be a one-to-one session. The group suggested multi-agency training for the staff to empower them to be more aware, ask the right questions, find out who the person and, if necessary challenge.
- SABs should give talks to partner organisations eg service user forums, carer groups, faith and community organisations to put out the message about financial abuse and how to access support or preventative actions adults can take.
- Make sure that people are aware that it is the responsibility of the public body making the payment to take legal steps to recover and misappropriation of public funds (e.g. direct payments) from the perpetrator, through the courts if necessary.

What further opportunities are there for workforce training and policy development?

Practitioners reviewed existing guidance for staff regarding financial abuse and, having regard to the reported enablers/ barriers to good investigations and outcomes for adults experiencing this form of financial abuse, considered whether there is a shared understanding across partners agencies of how to respond to concerns.

The group were asked to develop an outline for workforce development materials and put forward any proposals for policy development. As reported above, many felt much more was needed to highlight key behavioural changes to be aware of. They also spoke of the need to give practitioners permission to use professional curiosity, with practical examples of what to do when the adult is isolated, avoidant, or reluctant to involve safeguarding or police processes. Practitioners highlighted the excellent work that was done across statutory, commercial and community organisations during Covid lockdowns to check on the person's safety and wellbeing where risks of other forms of domestic abuse (physical, sexual or psychological) or neglect were suspected. They felt this good practice should be replicated to enable effective multi-agency responses and interventions where financial/ economic abuse was suspected, but that this still required quite a culture shift in the workforce.

⁹ 'Let's Talk money' week ran across commercial, statutory and VCFS organisations in November 2021. More information and helpful resources are available at: <https://moneyandpensionsservice.org.uk/wp-content/uploads/2021/08/talk-money-week-participation-pack-2021.pdf>

Whilst there were examples of good guidance for staff,¹⁰ many commented this was not always easy to find.¹¹ They also highlighted how practice-based skills course (e.g. 'having difficult conversations, trauma informed practice) are currently available, but that making these multi-agency and available across partner agencies and the VCFS organisations working with adults at risk of economic/ financial abuse would help to build up professional networks. The police representatives spoke about the need for accessible training which could more easily be rolled out to frontline staff at morning briefings, given the high turnover of staff across the different partner agencies which can make it difficult to keep the focus on this aspect of financial abuse.

Feedback from the workshops was that any policy or practitioner guidance should be written with a view to empower practitioners, helping them to understand cultural issues but also when to involve other agencies (even against the adult at risk's expressed wishes) if risks from economic abuse warrant this or if because wider public safety concerns arose in a particular case.

Recommendation: Develop a practitioner guide or toolkit to set out:

- The legal powers agencies (including commercial organisations) could use to recognise this form of abuse, perhaps by using a 'Make Every Contact Count'¹² approach to develop a check list for things to ask at the start of the appointment about the 'other' person in attendance.
- Ensure that careful consideration of the power dynamics within relationships¹³ is explored by practitioners. Any guidance must include specific guidance on mental capacity and the impact that coercion, trauma etc can have on executive decision-making functions.
- Powers to share information, pragmatically gather and record evidence of abuse/ harm
- Set out **clear pathways for referrals/action** that best involves different agencies (e.g. 1 call/ access point or no wrong front door approach), clarifying when face-to-face meetings should take place and that multi-agency approaches should be used if both the adult at risk and person alleged to be causing harm are in need of care and support (for example, where frail, elderly parents are at risk from adult children with care and support needs.
- Set out possible escalation routes if interventions (including advice/ information) do not reduce the harm suffered or achieve the adult's desired outcome.
- Link this to other relevant briefings, e.g. the new safeguarding and carers briefing (LGA/ADASS)

¹⁰ For example, LGA/ADASS MSP [MSP: Case Studies](https://www.canva.com/design/DAEbFGknVke/bZdN5QD0wxhAP35OSnbOfA/view?utm_content=DAEbFGknVke&utm_campaign=designshare&utm_medium=link&utm_source=publishsharelink), https://www.canva.com/design/DAEbFGknVke/bZdN5QD0wxhAP35OSnbOfA/view?utm_content=DAEbFGknVke&utm_campaign=designshare&utm_medium=link&utm_source=publishsharelink and <https://survivingeconomicabuse.org/what-is-economic-abuse/>

¹¹ For example, very few of the attendees were aware of the grab guides on financial abuse BEH Mental Health Trust had developed for their staff.

¹² <https://www.barnet.gov.uk/health-and-wellbeing/resources-professionals/making-every-contact-count#title-4>

¹³ Including considering whether the adults voice and presentation is part of any assessment.

As important will be to have such trusted resources in an accessible place and to have a 'key messages' version or pictorial/ decision tree setting out core principles and key questions to consider for easy access.

Recommendation: Participants proposed that any new policy developments should:

- embed checks within existing advice offers,¹⁴ assessment or care and treatment processes.
- Whilst exemptions for LPA fees exist already if the adult at risk is on a fixed/ low income¹⁵ (e.g. pension) there is no reference to the person's assets on the form. Practitioners raised concerns that if someone is 'cash poor even when asset rich' this creates a disincentive for some people to proactively put in preventative measures against financial abuse. So suggested escalating to the APPC a proposal to review the exemption guidance to provide clarity on when fees would be waived and advertise this more widely.

Finally, practitioners **recommended** NCL SABs use safeguarding week in November 2022 to showcase new resources for practitioners through another virtual event and, thereafter, embedded into safeguarding training through the use of intra-familial financial abuse case studies etc. Likewise, the public awareness campaigns could reach a wide audience if timed to coincide with activities for 'Talk Money Week'¹⁶ on the 9-12.11.22.

Next steps:

We ask that this report is presented to each local SAB so that wider discussion is had at local level to decide how best to take forward recommendations. Each SAB will be invited to contribute to a final report on agreed action plans locally to address any recommendations. Where there are opportunities for further work across the NCL area, this will be discussed and agreed at the NCL SAB quarterly meetings, but this will depend on local priorities and available resources. The report findings will also be shared with the London SAB and directly into the APPG task force, via Professor Keith Brown (Task force member and Chair of SANN).

¹⁴ For example, by drawing on the lessons identified by the Citizen's Advice Bureau's report into the impact of their training <https://www.citizensadvice.org.uk/about-us/our-work/our-prevention-work/financial-skills-for-life/financial-skills-for-life-what-we-do/financial-skills-for-life-past-projects/now-lets-talk-money/>

¹⁵ [LPA120 - LPA and EPA fees \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/104442/lpa120-lpa-and-epa-fees.pdf)

¹⁶ <https://www.awarenessdays.com/awareness-days-calendar/talk-money-week-2022/>

Appendix A: Case Studies and practitioners' reflections

These have been re-produced to illustrate good practice already happening across the NCL area and what more might be needed to improve outcomes. The case studies are fully anonymised to enable dissemination and discussion at team meetings or within workforce development training and events.

Case Study 1: Edward.

Edward is a 90-year-old man who lived in a one-bedroom Council flat on his own. He mobilises with a walking stick, has partial hearing loss and was (at the time this referral came in) beginning to worry about short-term memory loss. His wife passed away 20 years ago and he has no children or wider family – though he has a small network of friends. In 2021, his GP referred him for an assessment of his care and support needs because he confided that he was struggling to keep his home clean and remember to pay important bills. The GP felt he needed support with medication as well. During the assessment visit, Edward explained that for many years, he was supported by Simon who was a long-term family friend who attended his Church. He had not had any other services going into him (aside from some support after a knee replacement a few years ago) Sadly, Simon too passed away in early 2020 unexpectedly. His daughter, Caroline (20 years old), then began visiting Edward on a semi-regular basis and saying that she would help him. He gave her £20-60 every week which she said she needed for food – and she sometimes brought him a pint of milk but never anything worth the amount of money given. He said that he sometimes found Caroline very nice and supportive but, that at other times, she could yell and become abusive. Simon had once told him that she had mental health issues. He was worried about the amount of money that he was giving her but didn't want to report her to the Police because he had been close to her father and thought she was vulnerable.

A Safeguarding Concern was completed by the SPA social worker and sent to the MASH. At the same time, the Single Point of Access Social Worker continued her assessment and put services in – she began talking to him about a domiciliary care agency but also a floating support agency that supports with bills and budgeting. He identified that he had another friend, Georgina, who he trusted and he felt could support him with the Safeguarding process. The MASH engaged with Edward and completed a Mental Capacity Assessment around his ability to manage his finances. They found that, with the support of his friend Georgina to prompt, he was able to do this. They arranged for Georgina to help Edward set up direct debits for all bills.

Edward's desired outcome was that he continue to give Caroline money because he was concerned for her but that this be restricted to only £20/week. Professionals were concerned about this and discussed it with him at length. He also wanted to move closer to his friend Georgina and her family – but this involved moving to another Local Authority area. A third-party disclosure was made to Police but they could not progress as Edward did not wish this. The Mental Health Trust had no record of Caroline. The Safeguarding Plan put in place was that an application for sheltered accommodation would be made in the other area, Georgina would continue to support with finances and the domiciliary care agency (and a day service visit weekly) would continue.

When the Safeguarding Review was conducted, 6 months later, it was found that (although Edward was generally happier with his care), Caroline was still regularly taking his money and he was unhappy about this. It was felt that discussions about who would fund Edward's placement in the new Borough had caused delays so it was decided that original Local Authority would fund his care in the new borough for a temporary period. His memory loss had also progressed. A new Mental Capacity Assessment was conducted that concluded that he did not have capacity to manage his own finances anymore (even with support) and Georgina is being supported to apply for Power of Attorney.

Practitioner reflections:

Whilst there was good evidence that Edward was kept at the centre of decision making and that his capacity to manage his finances was reviewed throughout the enquiry, practitioners reviewing this case felt more could have been done to support Edward challenge Caroline's behaviour. Practitioners understood and respected he did not wish to escalate this as a police matter, out of respect for his friendship with her father and concern for her wellbeing. The expressed discomfort at interfering in a person's private life, particularly where they perceived the adult at risk was making unwise decisions to continue to associate with those exploiting them. This mirrored findings in the Lincolnshire SAB's thematic review, this is particularly acute where the adult at risk declines a referral to the police or safeguarding enquiry and the findings within that report (especially in respect to the continued duty of care to mitigate high risk, improving understanding of the impact that controlling behaviours can have on decision making and the need to transfer learning from the field of domestic abuse into the safeguarding arena)¹⁷ resonant with practitioner feedback in this case.

Practitioners noted the inquisitive and collaborative approach undertaken within the enquiry, including contacting mental health services to ascertain if Caroline was known and already supported. Whilst, arguably, the rationale for disclosing she was subject to a safeguarding enquiry wasn't set out within the case study, it is noted the s.42 duty provides powers to explore whether she posed a wider risk to other adults with care and support needs or had care and support needs herself. Practitioners commented on the absence within the safeguarding plan of actions to assess Caroline's needs, the risks she posed to Edward or others or address her behaviour directly with her. The inclusion, within the Domestic abuse Act 2021, of economic abuse provides opportunities to directly highlight to her the impact her behaviours were having and s42 Care Act permits local authorities to set out actions others are required to take. If, having consulted with Caroline and satisfied themselves she understood the impact of her actions, but persisted to take money, this could justify a more forceful intervention.

They also questioned whether police involvement should have been reconsidered when the subsequent capacity assessment indicated he could not make these decisions and he had expressed unhappiness about her continuing to take money, but reflected this would need careful consideration particularly if action had not been taken previously to advise Caroline of professionals concerns.

¹⁷ Ibid, at 4.2

Case Study 2: **Alice**

The DWP internal alert system picked up that Alice had made 5 separate Universal Credit ['UC'] claims, each of which had a different male attached. Her DWP's Disability Employment Advisor ['DEA'] was aware that activity such as this, coupled with Alice's vulnerability were likely indicators of exploitation. So, rather than process these applications as fraudulent activity, the DEA considered their duties under safeguarding and modern slavery guidance.

As the UC applications had been made on-line, no-one from the DWP had yet met with Alice so agreed there was an urgent need to meet with her, alone and to interview her. An immediate freeze was put in place to prevent her fellow applicants having access to her money and information on her file.¹⁸ However, recognising the priority was to ensure she had access to sufficient funds, they made contact through her Job Centre 'journal'. All claimants have this so that DWP staff can send iMessages to claimants. Claimants are also able to use it to communicate with work coaches or provide notification of important changes in circumstances that might prevent them from complying with their expectations (e.g. bereavement, or financial difficulties). The DEA officer contacted Alice's mother and hostel staff to ascertain if she was living at the address given and understand her history so they could assess the risk in context. Hostel staff confirmed that she was residing at the address and so too were several of the men she had named in her claims, they reported those individuals also had vulnerabilities. The DEA understood that it would be likely that she would attend with one or more of the men they suspected of exploitation, so Job centre staff (including security) were advised of a plan to ensure she could be safely interviewed alone by two female staff members, using careful, non-confrontational questions, and understanding she would likely be resistant to disclosing information regarding any exploitation.

Throughout the interview Alice sought to provide assurances that she was not experiencing domestic abuse or financial exploitation by the men named on the applications. She was highly distressed, but consistently explained she had named the men as she had difficulties in managing her monies and they were supporting her. Staff interviewing her were concerned she had learning difficulties, poor mental health and given her past trauma of domestic abuse, felt she may have normalised the level of harm so wouldn't recognise her risk of exploitation. She had a history of homelessness and reported she relied on the support from each of the men of the claims; she also reported the benefits to her of those relationships. DWP staff were aware they could not prevent her returning to the relationships as this was beyond their legal powers. Equally, they were satisfied that she remained at high risk of financial exploitation. She reported reluctance to approach the local authority to secure support, despite DWP staff explained that such help might reduce her dependency on the men she believed were friends. She refused consent for the DWP staff to refer for housing or social care support, however, aware of the wider safety duties, DWP staff raised a safeguarding concern with the local authority.

Her DEA was clear with Alice that her reliance on others to manage her finances put her at increased risk of exploitation and triggered their duties to investigate. They resolved with

¹⁸ A fellow applicant has automatic access to information on the claim, including any safeguarding concerns. This can create barriers to good recording practice (though this was not seen in this case).

her to open a new bank account and UC claim so that no other person would be able to access her money. The DEA explained, if this were to happen again (because she can apply online or at another jobcentre) it would be immediately flagged and investigated and that the DWP would have to stop any payments. The DEA supported Alice to open new bank account and the bank agreed to flag if any individuals try to take money out of the account. DWP officers explained that often it can be difficult to get banks to understand they may need to act, but in this case explained to bank staff that the DWP had no other legal powers they could use to prevent exploitation or abuse, so asked the bank '*what more could you do to keep her safe and what can we do to facilitate this?*' DWP have subsequently commented that if more partner agencies take this approach and make such requests from commercial organisations it is more likely those organisations will see this as something they need to have a policy on. During the workshop the DEA confirmed that, since writing up the case study Alice had made a further UC claim at another jobcentre. This was picked up quickly by the flagging system and they have alerted the team in that area to the concerns and ongoing support offered by the DEA to assist Alice to recognise the risks.

Practitioners' reflections:

Throughout this case staff demonstrated good quality, trauma-informed practice. There was clear evidence of a safeguarding plan which engaged with relevant partner agencies, including the bank. Practitioners from the DWP explained they are trained to identify patterns of behaviour, e.g. having several accounts, together with her history of past traumas and encouraged to share information, including initiating conversations with family members, social worker/support worker. However, usually they are reliant on information from the claimant when they're applying for benefits and have developed systems to prompt enquiries/ professional curiosity though there is flexibility to allow for cases to be considered on the specific facts. For example, adaptations made to sensitively address new claims arising from the war in the Ukraine. Practitioners explained that, because their staff are dealing with large case numbers (approximately 300 per DEA), they understand the value of specialist staff to upskill and provide support on safeguarding matters, but it is also crucial for organisational support and building networks with other partner agencies to enable frontline staff to refer for wider support and enact safety plans.

There is evidence throughout the enquiry that Alice's voice was heard, and care taken to explain the risks of exploitation to her. Whilst some practitioners commented that a referral for advocacy support (either under the legal duties s68 Care Act via an IDVA service) may have further improved this and enabled her to build a trusting relationship with someone independent of welfare/statutory services, others (including those working within MASH teams) explained they could only refer for these services with the person's consent.¹⁹ They also explained it wasn't always possible to secure independent advocacy within the necessary timeframes to conduct enquiries.

DWP staff commented they took a proportionate, pragmatic decision in this case to refer to the local authority against Alice's wishes, due to the long-term risks of exploitation. There was clear evidence of multi-agency practice, despite challenges of not being about to record risks and safety plan/ actions taken on Alice's file. The engagement with Bank staff was pro-

¹⁹ This may have been reported in error, the duty to appoint an advocate arises where a person would have substantial difficulty engaging with a safeguarding process or may lack capacity to consent.

active. Practitioners reported that, generally, banks were now alert in respect of safeguarding concerns and should be considered more frequently within safeguarding plans. DWP specialist safeguarding practitioners reported they can conduct an emergency home visit if necessary and this is not dependent on the adult's consent. They also spoke of time where, because of urgent concerns, they have asked for (and received) police assistance to enter a home where they felt this was necessary to prevent loss of life/self-harm. MASH staff also confirmed they work closely with the police, (as are collocated), their team also have access to electronic case records for GP and mental health, social care so can get a lot of information together when receive referrals about safeguarding concerns. Again, this mirrored the findings of similar reviews, underpinning the added value of the multi-agency safeguarding process, but also highlighting the need for alignment across different risk management processes (for example, within Alice's case this could trigger consideration under s42 safeguarding processes, MARAC and the modern slavery panels).