



Home Office

Money laundering-linked financial exploitation

Guidance for frontline professionals

2024



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Who is this guidance for?

The financial exploitation of children and adults at risk can have life-changing impacts on victims and their families. However, it is often not recognised, and many victims go without the support they need, including where the exploitation is linked to money laundering.

This guidance is aimed at frontline professionals and organisations who work with children and adults at risk.¹ The guidance is intended to enable practitioners to recognise and respond to financial exploitation linked to money laundering so that victims, and potential victims, can get the protection and support they need.

This includes professionals working in:

- education
- health
- adult social care, children's social care and early help/family support
- housing
- the benefits system
- policing
- prisons, probation and youth justice
- multi-agency partnerships
- related partner organisations, for example in the voluntary sector.

Parents, carers, and guardians might also find this information useful.

¹The term 'adult at risk' is shorthand for 'adult at risk of abuse or neglect' as defined in the Care Act 2014 for England, and the Social Services and Well-being (Wales) Act 2014 for Wales. It replaces the historic term 'vulnerable adult'.

Executive summary

What is 'financial exploitation'?

Financial exploitation can take many forms. In this context, we use the term to describe exploitation which takes place for the purpose of money laundering. **This is when criminals target children and adults at risk and take advantage of an imbalance of power to coerce, control, manipulate, or deceive them into facilitating the movement of illicit funds.** This can include physical cash and/or payments through financial products, such as bank and cryptocurrency accounts.

Financial exploitation is a form of criminal exploitation, or Child Criminal Exploitation when the victim is under 18 years old. It can take place in isolation or alongside other forms of exploitation.

What can it look like?

Criminals use complex methods to exploit their victims, including coercive control, threats of violence, and offering an exchange. A financial or other gain is often a core component of financial exploitation, where alongside other harmful exploitative actions, criminals will purport to offer them a benefit in exchange for the ability to use their account. The victim will not necessarily be aware that the funds the perpetrator is directing them to move through their account are the proceeds of crime. Victims may also be coerced into handing over control of bank accounts to the perpetrator – this could be an existing account, or one specifically opened with their personal details under direction of the perpetrator.

How can professionals help?

Any child or adult at risk who you think may be at risk of financial exploitation requires a safeguarding response. This means that professionals should follow their local safeguarding guidance. They should take a multi-agency approach where possible.

Professionals can also work to educate children and adults at risk about financial exploitation, and what they should do if they have concerns. **This should include helping them to understand that they should discuss any concerns with a trusted adult, seek support from the police, and get additional help from relevant charities.**

Professionals may also wish to refer to the 'Don't be Fooled' website launched by UK Finance and Cifas to educate children and at risk adults on the risks of money mule activity. <https://www.moneymules.co.uk/> .

Will victims get in trouble?

Victims should be treated as victims, not as criminals. While victims might have been exploited into breaking the law, the safety of victims should always be put first by statutory services, including the police. Asking the police for help and making them aware of any concerns about financial exploitation can be the first step to ensuring that a victim gets the support they need, and that criminals are stopped. This can seem daunting, and some people might think that going to the police will get a victim into trouble.

However, the police have a duty to safeguard and protect any child or adult at risk, and victims should expect police officers to deal with concerns promptly. Victims can expect the police and other statutory services to assess all the information available and choose an appropriate safeguarding response.

Those that are convicted of laundering the proceeds of crime face severe punishments, including up to 14 years in prison.

Context

What is money laundering?

Money laundering is the process by which the proceeds of crime, such as illegally obtained funds and property, are moved by criminals to make them appear legitimate. These proceeds can come from crimes such as modern slavery (including human trafficking), drug trafficking and fraud.

Money laundering is a criminal offence. Punishments are severe and can include custodial sentences of up to 14 years in prison and/or an unlimited fine.²

What is 'money muling'?

Money muling is when an individual, commonly referred to as a 'money mule',³ moves the proceeds of crime on behalf of criminals, sometimes in exchange for payment or other benefit. They help hide the origin of illicit funds in various ways, including moving them through their own bank account (or multiple accounts), buying and selling cryptocurrencies, or withdrawing cash and handing it over. Money mules can also give control of their account to criminals to enable them to transfer the funds themselves. Each transaction helps to further obfuscate the trail of the funds and takes the money one step further away from the initial crime.

What is 'financial exploitation'?

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Financial exploitation is a form of criminal exploitation, or Child Criminal Exploitation when the victim is under 18 years old. It can take place in isolation or alongside other forms of exploitation.

Victims can be exploited into breaking the law. While they might be unaware that they are breaking the law or being exploited, statutory services are required to identify victims and to respond to them as victims.

² [Money Laundering Offences | The Crown Prosecution Service \(cps.gov.uk\)](https://www.cps.gov.uk/money-laundering-offences).

³ 'Money mule' is a recognised term that is used in this way internationally, including by the banking sector, law enforcement and academia. Referring to people who are victims of money laundering-linked financial exploitation as money mules is not appropriate.

What is a money mule network?

A money mule network is a group of people or accounts used by criminals to launder funds. Criminals controlling these networks will organise or direct transactions between their victims and money mules while maintaining their own anonymity. It should not be assumed that those in these networks will know the identities of the others involved.

Those controlling these networks are commonly referred to as money mule 'herders', 'controllers', or 'recruiters'.

The National Crime Agency (NCA) assesses there is a realistic possibility that the scale of money laundering in the UK annually is hundreds of billions of pounds.⁴ It is estimated that over £10 billion of illicit funds are laundered through money mule networks each year in the UK,⁵ and in 2022 there were over 39,000 accounts demonstrating behaviour indicative of money muling.⁶ Some of the accounts used in money mule networks are likely to be owned by the victims of financial exploitation.

Use of language

It is important to maintain a distinction between money mules and the victims of related financial exploitation, including with the terminology used.

The definitions set out above should not be used interchangeably. Perhaps most importantly, the term 'money mule' should not be used to describe victims of financial exploitation due to the risk of dehumanising and stigmatising them.

Further guidance on the appropriate use of language in cases of exploitation can be found in the 'Further Resources' section of this guidance.

⁴ [Money laundering and illicit finance - National Crime Agency.](#)

⁵ [National Strategic Assessment \(NSA\) Campaign 2023 - Money Laundering - National Crime Agency.](#)

⁶ [Fraudscape 2023 - Cifas.](#)

Methods used by criminals to exploit their victims

Exploitation is typified by some form of power imbalance which perpetrators use to force, coerce, and groom victims into illegal activity. Criminals use a variety of techniques and methods to exploit their victims either online or in person. These can appear unsophisticated or organised, and victims may have been exploited even if the activity appears consensual.

While more evidence is needed to better understand the methods used by the perpetrators of financial exploitation, some examples of the methods used for other sorts of exploitation include:

- **offering an exchange** – criminals can offer victims a benefit of some sort in exchange for the use of their account. This can include money, physical possessions such as clothes, digital goods, and online assets. Other benefits can include perceived status or friendship, protection, a sense of belonging and identity, or affection.
- **physical violence or threats of violence** – used to intimidate or punish victims or their families. This might involve weapons, including knives and firearms or the use of other violent crime to intimidate, including robbery.
- **emotional abuse or psychological coercive control** – by manipulating, threatening, controlling, or monitoring the movements of the victim. This includes examples where the victim may believe they are in a relationship with the perpetrator.
- **extortion** – by forcing victims to commit a crime so they can hold it over them and threaten to report it if they do not comply.
- **abduction or kidnapping** – victims can be forcibly moved and held in a location away from home.
- **sexual abuse** – this can be experienced by all sexes, genders, and sexual orientations.
- **debt bondage** – a form of entrapment when a victim owes money to their exploiters and is made to repay their debt, either financially or through another means. The exploiter may groom the victim by initially providing money or goods which the victim will then be made to pay back. The exploiter may also deliberately manufacture a debt. For example, criminals might stage a robbery of drugs or cash in the victim's possession to ensure the victim will continue to perform tasks for them. The debt may also be inherited from family members. Banks often detect and

freeze criminal funds. In such situations, criminals might insist that victims 'owe' them the funds, creating debt bondage.

Crossover with other forms of exploitation

While some victims might experience a single form of exploitation, this is not always the case. Victims might experience multiple types of exploitation at the same time or sequentially, and this should be considered as part of any safeguarding response.

Some instances of criminal exploitation might fall under the term 'modern slavery'. Modern Slavery offences are serious crimes under the Modern Slavery Act 2015 that violates human rights where victims are forced, threatened, or deceived into situations of subjugation, degradation and control which undermine their personal identity and sense of self. This can include forced labour and domestic servitude.

Additional information on other types of exploitation can be found in the Further Resources section of this guidance.

Case study

Harry is a 14-year-old boy living in foster care.⁷ Harry was approached on Snapchat by someone claiming to be a similarly aged girl called Isabelle. In reality, 'Isabelle' was a fake persona created by an older, male criminal – a perpetrator of exploitation.

Over the next fortnight, the older man used the fake persona of 'Isabelle' to deceive Harry into believing that they were in a relationship, and that Harry could trust them. The man manipulated Harry into sharing a sexually intimate video of himself, and then used it to extort Harry into handing over his bank details. Harry was told that if he refused the video would be sent to everyone at his school.

The criminal then used Harry's bank account to launder the proceeds of crime. When Harry's foster carer found out that the account was being controlled by someone else, they closed the account immediately but took no further action.

In response, the criminal extorted Harry into getting the bank details of other children at his school by again threatening to share the video with everyone if he refused.

This case study demonstrates one way in which a person can be subjected to multiple forms of exploitation, with perpetrators using malicious techniques to manipulate and deceive for criminal purposes. Here Harry was a victim of both child sexual and financial exploitation and was coerced into doing things.

⁷This case study is based on a real case shared with the Home Office. Identifying information, including names, have been changed.

Who is vulnerable to financial exploitation?

Any child or adult at risk can be a victim of financial exploitation as perpetrators continue to adapt who they target to avoid detection. A person of any sex, gender, sexual orientation, background, religion, belief or race - in any location - can be approached by the criminals behind money mule networks. Educating people about the risks of this sort of financial exploitation is a key preventative measure. The government has published a [Money Mule and Financial Exploitation Action Plan](#) detailing its approach to protecting victims and disrupting criminality in this area.

The NCA assesses that it is highly likely that the criminals behind money mule networks use social media as their main method of exploiting potential victims and recruiting criminal money mules.⁸ Figures published by Cifas and UK Finance suggest that in the first six months of 2023, 23% of all accounts reported as bearing the hallmarks of money muling activity were owned by young people aged 21 and under.⁹

Risk factors

More research is needed to better understand the risk factors for financial exploitation, but the following may all heighten a person's vulnerability to exploitation more generally:

- **experience of neglect, physical abuse, sexual abuse/exploitation, or a lack of a safe/stable home environment, now or in the past (including domestic abuse, parental substance misuse or parental criminal involvement)** – trauma, including adverse childhood experiences, can negatively impact on an individual's ability to develop trusted relationships or access support services.
- **having a disability or a neurodivergent condition** – for instance victims may be less able to recognise they are being exploited, or less able to communicate what is happening or access support.
- **having mental health issues** – exploiters may target poor emotional wellbeing or low self-esteem.
- **economic vulnerability or being in debt** – offers of material possessions or money for victims or their family may be more readily accepted out of a feeling of necessity and lack of legitimate financial alternatives.
- **connections with other people involved in crime** – some individuals are targeted through family or friends who are already involved in criminal activity and sometimes a drug debt owed by them is passed on to friends or family members.

⁸ NCA Intelligence Analysis 2023.

⁹ [Cifas and UK Finance launch lesson plans to prevent young adults from becoming money mules | Cifas.](#)

- **having contact with the criminal justice system** – even for minor offences.
- **social isolation or social difficulties** – the lack of a support network can mean someone is less able to recognise what is happening or to get help.
- **homelessness or insecure accommodation status** – where there is a lack of a safe environment to provide security and privacy.
- **substance misuse issues** – victims are sometimes given substances in lieu of payment.
- **being in or leaving care** – the reasons why a person is brought into care can heighten their vulnerability, while those in semi-independent/independent accommodation, placed out-of-area or leaving care may have less access to support networks.
- **being excluded from mainstream education, and/or a pupil at an alternative provision such as a pupil referral unit** – factors influencing a child’s exclusion may expose them to exploitation, and for those with a reduced timetable or not attending school at all, time spent unsupervised can also offer opportunities for exploitation.
- **insecure immigration status** – unaccompanied asylum-seeking children and others without secure status can be more easily exploited and may have remaining links to organised criminals following their experiences.

It is important to remember that risk factors, such as these, are never the cause of a person’s exploitation. Rather, they give rise to the imbalance of power which perpetrators seek to abuse. People can also be targeted and become victims when none of these circumstances apply.

What to look out for

Professionals should not expect victims to report their exploitation as they may not identify, or be able to express, that they are being exploited. They may also be too afraid to tell others what is happening out of fear of the consequences or for fear of retaliation by their exploiter.

However, exploitation often leaves warning signs and professional curiosity should be used to explore these, considering any immediate safeguarding risks. Any sudden change in behaviour should be discussed with the individual and considered a potential safeguarding concern. Where safe and relevant to do so, professionals should consider discussing such changes in behaviour with the parent or carer of a potential victim, as well as other multi-agency professionals.

Possible signs of exploitation

Indicators that a person may be being exploited include but are not limited to the following. These are not specific to money laundering-linked financial exploitation:

- An unexplained change in behaviour including becoming more withdrawn, secretive, anxious, angry and/or aggressive.
- Unexpected acquisition of luxury and expensive goods (these could be physical or digital).
- Unexpected and unexplainable cash or money in bank or cryptocurrency accounts.
- Having new relationships that were established online.
- The excessive receipt of texts, messages through any platform, or phone calls.
- Being in possession of multiple SIM cards or handsets.
- Unexplained absences, e.g., from home, work, school, or other education setting.
- Becoming more reclusive or socially isolated from their usual social group. The use of new and unusual phrases. For financial exploitation, this might include terms such as 'squaring' or 'smurfing'.

Further indicators are included in the Modern Slavery Guidance and Child exploitation disruption toolkit.¹⁰

Indicators that a person is a victim of financial exploitation

Observations from cross-sector organisations responding to financial exploitation suggest that the following might be indicators of financial exploitation. They include people:

¹⁰ [Modern Slavery: Statutory Guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and Non-Statutory Guidance for Scotland and Northern Ireland \(publishing.service.gov.uk\)](#), [Child exploitation disruption toolkit \(publishing.service.gov.uk\)](#).

- Changing their banking behaviour. This might include receiving large or unexplained deposits into a bank account.
- Becoming more secretive, especially about their finances.
- Opening new accounts with banks or crypto exchanges.¹¹ This is especially relevant for those which can be opened online or through an app.
- Becoming more protective about the ability of others (for instance their parents) to access or view their bank accounts.
- Having bank accounts closed unexpectedly, difficulties opening new ones or accessing other financial services.
- Receiving excessive letters from banks or debt collectors.
- Changing their use of cash and frequency of ATM withdrawals.

¹¹ Criminals might transfer money to a mule account and ask them to buy some cryptocurrency, which they then transfer between accounts and later sell. By transacting in this way, the criminals are trying to hide the origins of their illicit cash.

How criminals target their victims

Criminals use a variety of ways to target people, with similar methods used to exploit victims and to recruit willing money mules. For example, criminals can offer a payment or other benefit to both victims and those willingly involved. Where such techniques are used alongside an imbalance of power to coerce, control, manipulate, or deceive children and adults at risk, these approaches are financial exploitation.

The objective of the criminals responsible is to build a network of accounts through which they can transfer the proceeds of crime whilst maintaining anonymity. They do not care for the individual they are targeting, no matter what they say or how genuine they appear. Victims can often act in good faith and not understand that they are involved in illegal activity.

Methods used by criminals to target victims can be complex and opaque and may factor into broader exploitation. They include, but are not limited to, approaches via:

- **Social media.** It is assessed as highly likely that this is the most prominent method for recruiting online,¹² with criminals offering quick and easy cash in exchange for access to their bank accounts or moving funds through them. The criminals might post pictures of luxury goods or large amounts of cash to lure victims and might ask those who contact them to do so via direct/private messaging instead of leaving comments on public posts.

Perpetrators of exploitation and abuse can use social media to mislead their victims into believing that they are in a relationship and can be trusted. This trust can then be exploited. Children and adults at risk can also be coerced into sharing sexually intimate images or videos of themselves to someone they believe they are in a relationship with. Criminals can then use these images to extort victims with the threat that they will be shared with friends or family if they do not comply.¹³

- **Online video games.** Recruiters will offer people cash or in-game currencies or other digital products including 'skins' in exchange for their bank details or for direct access to their bank account.¹⁴ The criminal might post a generic message for multiple players to see before moving the conversation to private messaging.
- **Dating apps and websites.** Romance fraud can occur when someone convinces a victim that they are in a genuine relationship and can be trusted, before exploiting them. This can lead to the victim being deceived into moving the proceeds of crime

¹² NCA Intelligence Analysis 2023.

¹³ Where the victim is a child and there is a sexual element, this would also amount to child sexual abuse or exploitation.

¹⁴ Skins are pieces of virtual clothing which change the appearance of a character.

through their account or handing over access of their account to criminals. Victims often feel too ashamed to report it once they realise what has happened.¹⁵

- **Online jobs sites and adverts.** Advertisements for well-paid, low-hour, remote working opportunities are posted on online job sites, social media or emailed directly to potential victims. Eventually, the applicant will be asked to move funds, either through traditional bank accounts or those for cryptocurrency firms. These fake job adverts usually focus on offers of 'easy money' and might include spelling errors – neither of which would usually be included in legitimate advertisements.

Criminals can also exploit victims in person using similar tactics to the online methods listed above. For example, a victim may be physically approached by a criminal and manipulated into moving funds on their behalf.

¹⁵ Approaches using these platforms can amount to child sexual abuse or exploitation when criminal target children and there is a sexual element.

How to advise potential victims

Children and adults at risk might not recognise or understand financial exploitation. If they have concerns about someone who has approached them, they should be encouraged to take the following steps.

- Discuss their concerns with a trusted adult. This adult should then seek advice and follow safeguarding reporting requirements where necessary.
- Do not give any banking details to, or carry out any transactions for, that person.
- Seek support from the police by calling 101 in a non-emergency, or 999 in an emergency.
- Consider breaking off contact with the person where they have appropriate support to do so safely.

If a potential victim has been approached by a criminal online, a frontline professional (or a responsible adult) should help them in reporting any exploitative or illegal content to the relevant platform. This can help the platform to block or remove the recruiter's account.

What can parents, carers, and guardians do?

Children and adults at risk should be encouraged to discuss any concerns that they might have with parents, carers and guardians. These responsible adults should feel empowered to follow the above steps where relevant – with the most important being to seek support from the police.

Some people might be concerned that contacting the police will get a victim into trouble. However, the police and other statutory bodies have a duty to protect and safeguard victims and seeking their support can be the first step to ensuring that a victim gets the support they need. Engaging with the police can help to stop criminals from exploiting more people.

The next section of this guidance highlights support which both victims and their families or carers can access in addition to calling the police directly.

Support and reporting routes

For everyone - Crimestoppers

People who want to submit a report but who do not want to reveal their identity can do so 100% anonymously by contacting Crimestoppers online at [Independent UK charity taking crime information anonymously | Crimestoppers \(crimestoppers-uk.org\)](https://www.crimestoppers-uk.org) or by calling 0800 555 111.

Nobody will know the identity of the person who makes the report - not even Crimestoppers – unless the person making the report chooses to share this information.

Crimestoppers will pass any information on to the police which can be used as part of an investigation, and they can also signpost additional support.

Crimestoppers also operate a service specifically for young people called Fearless. This can be contacted using the standard Crimestoppers number or via their website: [Give information about crime 100% anonymously | Fearless | Crimestoppers \(crimestoppers-uk.org\)](https://www.crimestoppers-uk.org).

For concerns about children

Childline

Childline is the UK's free, 24-hour helpline for children and young people. Run by the NSPCC, Childline gives children and young people up to the age of 19 confidential support for whatever is worrying them. Childline's confidentiality promise enables a safe space for children to speak to about anything, without worrying that the information will be shared with others. For more detail see: [Confidentiality promise | Childline](https://www.childline.org.uk).

Childline is formed of trained counsellors who can offer support on exploitation and other related areas, such as online safety.

They can be contacted 24 hours a day, 7 days a week either by calling 0800 1111 or online via chat or email <https://www.childline.org.uk/get-support/>.

The NSPCC

The NSPCC is the UK's leading children's charity. They work with children, families, and professionals to protect children and prevent abuse.

The NSPCC operates a helpline for anyone who has any concerns about a child's safety or wellbeing. These concerns do not have to relate to abuse or an emergency, and you don't have to tell them who you are when you contact them.

You can contact the NSPCC's helpline by calling 0808 800 5000 or emailing help@NSPCC.org.uk. More information about the NSPCC is available on their website: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/nspcc-helpline/>.

For concerns about adults at risk

Local authorities and statutory service providers are best placed to help adults at risk find the most helpful support service for their individual needs. This might include local or national charities, specific helplines, or other local services.

In addition to the above, the Home Office has committed to piloting a support service for victims of money laundering-linked financial exploitation.

Safeguarding – what frontline professionals should do

Any child or adult at risk who you think may be at risk of financial exploitation requires a safeguarding response. This means that that frontline professionals should follow their local safeguarding guidance and policy.

This guidance covers England and Wales. General resources for the safeguarding of children and adults in Scotland and Northern Ireland can be found in the further resources section of this guidance.

For anyone at immediate risk of harm

Contact the police. Call 999 now.

If a person is not at immediate risk of harm

In England, follow your local safeguarding guidance (see below) and ensure any information you have (e.g., the physical locations of those involved, or which platform was used in cases of exploitation online) is shared with local authority social services and the police. This can help the police to better protect victims and tackle the perpetrators of the criminal exploitation. Police involvement should not be limited to instances of immediate risk of harm.

The first step is usually to contact your designated safeguarding lead within your organisation. They should complete a safeguarding referral to the local authority responsible for a child or adult at risk and involve the police where appropriate. If you don't know who this is, refer to your manager. Your designated safeguarding lead has the responsibility for linking in with your local authority's social services, but you should follow up to ensure action is taken. You should not assume a colleague, or another professional, will take action that might be critical in keeping a vulnerable person safe.

Your local authority's social services will then consider with safeguarding partner agencies whether any further actions are necessary to protect the vulnerable person.

If you are not satisfied with the local authority's response, you should follow up on your concerns by discussing these with your safeguarding lead or escalating them via the local escalation procedure.

In Wales, follow the Wales Safeguarding Procedures.¹⁶ The Wales Safeguarding Procedures set out the essential roles and responsibilities for practitioners to ensure that they safeguard children and adults who are at risk of abuse and neglect. There are various

¹⁶ [Safeguarding Wales](#)

All Wales Practice Guides relevant to tackling financial exploitation and other forms of Child Criminal Exploitation.¹⁷

Further information on safeguarding can be found in the further resources section of this guidance.

Concerns about children

Statutory guidance sets out what professionals and organisations in England and Wales need to do, individually and in partnership with other agencies, to safeguard and promote the welfare of children and young people.

The statutory guidance for England is called Working Together to Safeguard Children, and it is available online at: [Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/67282/Working_together_to_safeguard_children_-_2013.pdf).

The statutory guidance for Wales is called Working Together to Safeguard People, and it is available online at: [Statutory guidance | Social Care Wales](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/67282/Working_together_to_safeguard_children_-_2013.pdf).

These highlight that everyone who works with children has a responsibility for keeping them safe and that multi-agency working, and information sharing, is essential to ensure children and families receive the right help at the right time.

They make clear that in all welfare and safeguarding enquiries a child-centred approach should be adopted by practitioners to ensure that the best interests of the child are considered at all times.

They also set out further information about the equal and shared duty on the three safeguarding partners (the local authority, health, and police) to make arrangements to work together to safeguard and promote the welfare of all children in a local area. The guidance provides further information about the referral process for reporting concerns about the safety or welfare of a child. The guidance also set out the steps that practitioners should take when working together to assess and provide services for children who may be in need, including those suffering harm. They make clear that all local areas should have a local protocol in place that sets out how a case will be managed once a child is referred to children's social care.

Concerns about an adult at risk

In England, the Care Act 2014 statutory guidance sets out the organisational and individual responsibilities incumbent upon local authorities and their professionals.¹⁸ Local

¹⁷ [All Wales Practice Guides](#)

¹⁸ [Care and support statutory guidance - GOV.UK \(www.gov.uk\)](#).

authorities and their professionals must meet all their statutory obligations in relation to the (possible) financial exploitation of an adult at risk.

These include, but are not limited to, a local authority's obligation to:

- make enquiries, or ensure others do so, if it believes an adult is at risk of, abuse or neglect [...] An enquiry should establish whether any action needs to be taken to prevent abuse or neglect, and if so, by whom.
- set up a Safeguarding Adults Board (SAB) (see paragraphs 14.100 to 14.121 of the Care Act 2014 statutory guidance). The main objective of a SAB is to assure itself that local safeguarding arrangements and partners act to help and protect adults in its area, with care and support needs, who are at risk of neglect and/or abuse and are unable to protect themselves as a result of those needs.
- arrange, where appropriate, for an independent advocate to represent and support an adult who is the subject of a safeguarding enquiry or Safeguarding Adult Review where the adult has 'substantial difficulty' in being involved in the process and where there is no other appropriate adult to help them (see paragraphs 14.76 to 14.99 of the statutory guidance).
- cooperate with each of its relevant partners (as set out in section 6 of the Care Act) to protect adults experiencing or at risk of neglect and/or abuse.

In Wales, Part 7 of the Social Services and Well-being (Wales) Act 2014 places duties on relevant partners to report concerns to their local authority if it is suspected that an adult is at risk of neglect and/or abuse and for the local authority to make enquiries to enable it to take action.

National statutory guidance and the Wales Safeguarding Procedures support all practitioners to meet their safeguarding duties.¹⁹ The Procedures are applicable for everyone working in Wales whether employed by a devolved or non-devolved organisation and are supported by National Safeguarding Training, Learning and Development Standards.²⁰

Furthermore:

- All organisations must have arrangements in place which set out clearly the processes and the principles for sharing information between each other, with other professionals and the Safeguarding Adults Board (SAB); this could be via an Information Sharing Agreement to formalise the arrangements.
- No professional should assume that someone else will pass on information which they think may be critical to the safety and wellbeing of the adult. If a professional has concerns about the adult's welfare and believes they are suffering, or likely to suffer, abuse or neglect, then they should share the information with the local authority and/or the police if they believe or suspect that a crime has been committed.

¹⁹ [Safeguarding adults at risk of abuse or neglect | GOV.WALES.](#)

²⁰ [National safeguarding training, learning and... | Social Care Wales.](#)

For both children and adults at risk

Alongside the above guidance, it is recommended that:

- Parents/carers are engaged as partners in safeguarding wherever possible and it is considered safe to do so.
- Safeguarding referrals linked to financial exploitation should be clearly marked as such. The addition of a specific field on local safeguarding forms for financial exploitation may assist with this.
- Where necessary, professionals involved in the safeguarding response consider safety plans and disruption interventions to break the cycle of exploitation.
- More information about disruption tactics can be found in the Home Office's [child exploitation disruption toolkit](#). While the toolkit is focused on child exploitation, some of the tools listed can also be used to disrupt the exploitation of adults.

Reporting concerns linked to modern slavery and human trafficking

Criminal exploitation is a form of modern slavery. If you are a [designated First Responder](#) for the National Referral Mechanism (NRM), you must also refer any child you suspect of being a potential victim of modern slavery to the NRM using the [online referral form](#). In cases involving adults you must refer them where they provide informed consent for you to do so. Where an adult does not consent, statutory First Responders still have a 'Duty to Notify' the Home Office that they have encountered a potential victim.

In all cases, First Responders should consider whether it is appropriate to also refer a potential adult victim to local authority adult safeguarding services. The NRM is a framework for identifying potential victims of modern slavery and ensuring they receive the appropriate support. Any referral should be made after appropriate safeguarding steps have been taken and considering any required multi-agency discussions. If you are not a designated First Responder for the NRM you should work with a designated First Responder who may make such a referral where deemed appropriate.

First Responders should consult the statutory guidance '[Modern slavery: how to identify and support victims](#)' for information on the signs that someone may be a victim of modern slavery, the support available to victims, and the process for determining whether someone is a victim.

In the case of children, a First Responder referring a child into the NRM should also refer a child into the Independent Child Trafficking Guardian (ICTG) service. This can only be done if the NRM referral is made from within an ICTG site. ICTGs provide an independent source of advice and support for potentially trafficked children, irrespective of nationality, and somebody to advocate on their behalf to ensure their best interests are reflected in the decision-making of the public authorities involved in their care. First responders should consult the '[Interim Guidance for Independent Child Trafficking Guardians](#)' (page 14) for guidance on how to do this and information on which local authorities ICTGs are currently available in.

Victims of modern slavery are also provided a statutory defence for certain criminal offences under [Section 45 of the Modern Slavery Act 2015](#).

Further information on modern slavery can be found [online](#).

Ways of working

Putting the victim first

When working with a potential victim of financial exploitation, their activity may appear consensual, they may not recognise that they are being exploited, and the distinction between victim and perpetrator may be unclear. This may be particularly the case for those transitioning into adulthood. However, individuals who have been groomed and exploited into criminal activity have not freely chosen to be involved and cannot consent to being exploited. They should be seen as victims first and foremost.

It is important to recognise that victims might have had traumatic experiences which they may have begun to normalise. You should consider responses from a [trauma-informed perspective](#) and take an approach that puts the child, young person, or adult at risk first, including involving them in the safeguarding process and discussing next steps with them to build their trust.

Understanding the risks

When working with a suspected victim of financial exploitation, have professional curiosity, follow up on all the information they give you, keep a log of activity, and save any evidence related to the exploitation, including evidence of online messages, images, or videos. Build trust and use reachable moments to connect with the vulnerable person and actively seek inputs from different professional perspectives. You should share the information they give you with the police or statutory services for them to assess and consider as part of their response.

Partnerships and multi-agency working

Effective collaboration and information sharing is essential to protect victims and disrupt offenders. This should not be limited to public sector agencies – collaboration with the third sector and industry (especially banks and online tech companies) should also be considered and prioritised where necessary. It is important to share as much relevant information as possible with the statutory services as part of the safeguarding referral process. This will allow any assessment to consider all the available evidence.

Proactive sharing of other contextual information, such as assessments that have been undertaken, referrals for support, or other measures that are in place for a vulnerable person, will help partners act more effectively.

You should understand the multi-agency safeguarding arrangements and groups you can report information into locally which can enable this collaboration including, but not limited to, child protection strategy meetings, Multi-Agency Safeguarding Hubs, Multi-Agency

Child Exploitation panels (or equivalent), Community Safety Partnerships, Combating Drugs Partnerships and Multi-Agency Public Protection Arrangements.

Banks and law enforcement

Banks and Suspicious Activity Reports (SARs)

Banks are subject to Anti-Money Laundering regulations and must have policies, controls and procedures in place to monitor detect and manage effectively the risks of money laundering.²¹ If they suspect that a person is involved in money laundering, they have an obligation to submit a SAR to the NCA.²² In such circumstances, they might have a legal obligation to freeze the relevant account(s).

SARs alert law enforcement to potential instances of money laundering or terrorist financing. They provide law enforcement with information from the private sector that they would otherwise not have access to. This can lead to new investigations being launched or existing investigations being enhanced.

The SARs regime should only be used to report knowledge or suspicion of money laundering or terrorist financing. If someone wishes to report other crimes (e.g., fraud) then they should contact the police on 101 (or 999 in an emergency) or Action Fraud on 0300 123 2040.

What should banks do when they have concerns about money laundering-linked financial exploitation?

NCA guidance on how to report money laundering or terrorist financing concerns relating to a child or vulnerable person can be found here:

<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/money-laundering-and-illicit-finance/suspicious-activity-reports>.

Banks should follow this guidance about reporting concerns about money laundering-linked financial exploitation of children and adults at risk to the police directly. Alongside this, they should also submit a SAR to the NCA using the glossary codes set out in the guidance, as well as the crime reference number and the organisation details.

The response from law enforcement and statutory support services

All police have a statutory duty to safeguard and promote the welfare of children and adults at risk.

Police involvement can be the first step to helping a victim get the support that they need – the sooner they are alerted to concerns the sooner they can act to support the victim and tackle the criminals. It is therefore critical that banks follow the NCA guidance when they have concerns that a customer might be a victim of money laundering-linked financial exploitation and contact the police directly alongside submitting a SAR.

²¹ Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017: Regulation 19 (policies, controls and procedures).

²² Proceeds of Crime Act 2002.

The police should work together with other relevant organisations and statutory bodies to deliver a multi-agency response where appropriate.

Additional considerations

It can be difficult for banks to know whether an account owner is a complicit money mule or a coerced victim of financial exploitation. Where the case triggers an individual institutions' risk thresholds, or where law enforcement decides to take preventative action through the courts, this can lead to victims having their account frozen, leaving them with no access to their money. This in turn heightens a person's economic and financial instability, which criminals can capitalise on to further exploit and harm them.

As a frontline professional, if you become aware that a victim of financial exploitation has had their account frozen or transaction stopped, you can (with appropriate consent from the victim/parent/carer) support them in speaking to the bank and explaining the circumstances.

Where a case meets the required standard of proof, instances of fraudulent conduct involving misuse of a bank account may be recorded to fraud prevention services, such as the National Fraud Database (NFD). This is a system administered by Cifas which enables members to share fraud risk data and intelligence in real time.²³ and to help prevent and detect fraudulent conduct. Cases filed to the NFD must be supported by evidence and meet the requisite standard of proof for inclusion on the database.²⁴

Cifas members who subsequently match to NFD data apply their own risk criteria on a case-by-case basis to assess what action is appropriate to manage fraud risk when considering whether to offer or continue services and products. This can include enhanced account monitoring and/or closing bank accounts or rejection of applications for new products and services.

This first step for frontline professionals in circumstances where accounts are frozen/products are withdrawn or where a Cifas NFD marker has been put in place by the financial institution is to **(with appropriate consent from the victim/parent/carer) support victims in speaking with their bank to explain their individual circumstances.**

Cifas is working with cross-sector partners to build a better understanding of, and support for tackling, child financial harms, including financial exploitation as defined in this guidance. Furthermore, frontline professionals may find it useful to guide individuals to the

²³ Cifas is a not-for-profit membership organisation.

²⁴ See: <https://www.cifas.org.uk/fraud-prevention-community/member-benefits/data/nfd/nfd-principles>.

'Don't be Fooled' campaign launched by Cifas and UK Finance which offers tips around the risk indicators of being recruited by criminals and 'mule herders'.²⁵

Relevant guidance for banks

The Financial Conduct Authority (FCA) has published guidance for firms on the fair treatment of vulnerable customers, as well as rules and guidance for a Consumer Duty, which sets higher and clearer standards of consumer protection across financial services, requiring firms to act to deliver good outcomes for their customers. These can be accessed online at:

[Guidance for firms on the fair treatment of vulnerable customers | FCA](#) and [Consumer Duty | FCA](#).

The FCA has published a review on the proportionate response to identified money muling behaviours, in relation to the laundering of fraud proceeds. This includes guidance on the use of multi-sector data-sharing platforms both in detecting complicit money muling activity and in identifying potential at risk customers.

[Proceeds of fraud - Detecting and preventing money mules | FCA](#)

²⁵ www.moneymules.co.uk

Further Resources

General Safeguarding

- Department for Education, [Information sharing advice for safeguarding practitioners](#) – guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.
- Department for Education, [Working together to safeguard children](#) – statutory guidance which sets out what professionals and organisations in England need to do, individually and in partnership with other agencies, to safeguard and promote the welfare of children and young people.
- Department for Education, [Keeping child safe in education](#) – statutory guidance for schools and colleges on safeguarding children and safer recruitment.
- Department of Health and Social Care, [Care and Support](#) – statutory guidance on safeguarding adults.
- UK Government, [Report Child Abuse to Your Local Council](#) – an online tool which directs to the relevant local authority children’s social care contact number.

Guidance for other forms of exploitation

- Department for Education, [Child sexual exploitation: definition and guide for practitioners](#) – containing a definition of child sexual exploitation, potential vulnerabilities, indicators of abuse and appropriate action to take in response.
- Home Office, [Child exploitation disruption toolkit \(accessible\) - GOV.UK \(www.gov.uk\)](#) – a toolkit to support frontline practitioners to safeguard children and young people from sexual and criminal exploitation.
- Home Office, [Modern slavery: how to identify and support victims](#) – statutory guidance for England and Wales, describing the signs that someone may be a victim of modern slavery, the support available to victims, and the process for determining whether someone is a victim.
- Home Office, [Criminal exploitation of children and vulnerable adults: county lines](#) - guidance for frontline professionals on dealing with county lines, part of the government’s approach to ending gang violence and exploitation.
- The Children’s Society, [Look Closer Campaign](#) – a range of resources regarding child exploitation, the signs to look out for, and how to get help. Alongside these resources, The Children’s Society deliver sessions on financial exploitation at a

local level, with open-access sessions available nationally as part of their #LookCloser campaign.

- Reporting Modern Slavery - referrals to the NRM should be made using the online referral form [here](#).

Language

- The Children's Society, [Child Exploitation Appropriate Language Guide – guidance to professionals on the appropriate use of language when discussing children and their experience of exploitation in a range of contexts](#).
- The NWG Network, [Making Words Matter - Attending to Language when working with children subject to or at risk of Exploitation: A Practice & Knowledge Briefing](#).

Local government

- Local Government Association, [Tackling child exploitation: resources pack](#) – guidance for councillors, outlining local authorities' responsibilities with regard to child criminal and sexual exploitation.
- Local Government Association, [LGA resources on modern slavery](#) – a range of guidance documents and toolkits to support councils with their work on modern slavery.

Wales

- Safeguarding Wales, [Wales Safeguarding Procedures](#) – national Wales procedures which detail the essential roles and responsibilities for practitioners to ensure that they safeguard children and adults who are at risk of abuse and neglect.
- Safeguarding Wales, [All Wales Practice Guides - Safeguarding children from Child Criminal Exploitation](#) – additional information about safeguarding children from child criminal exploitation. It should be used in conjunction with the Wales Safeguarding Procedures.
- Welsh Government, [Wales Modern Slavery Safeguarding Pathway](#) – the pathway describes what to do if you encounter a suspected victim of modern slavery.
- Welsh Government, [Sharing information to safeguard people: factsheet](#) – a summary of what to consider when sharing information to safeguard people.
- [Trauma-Informed Wales](#) – an all-society framework to support a coherent, consistent approach to developing and implementing trauma-informed practice across Wales.

- [SchoolBeat.cymru](#) – Wales Police Schools Programme.

Ways of working

- The Children's Society, the University of Bedfordshire and Research in Practice, [Multi-agency Practice Principles for responding to child exploitation and extra-familial harm](#) – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice.
- The Children's Society, [National Exploitation Resources](#) – an accessible introductory guide to disruption for multi-agency professionals.
- [Contextual Safeguarding research programme](#) – publications and practice resources produced by the Contextual Safeguarding research programme.
- Office for Health Improvement and Disparities, [Working definition of trauma-informed practice](#) – guidance on trauma-informed practice.

Scotland

For more information on how safeguarding is managed within Scotland, please visit:

- In all cases where it is suspected that a child up to the age of 18 may be a victim of exploitation or trafficking, child protection procedures in line with the [National Guidance for Child Protection in Scotland 2021 – Updated 2023](#) must be activated immediately.
- The [Adult Support and Protection \(Scotland\) Act 2007](#) (“the Act”) includes provisions intended to protect those adults (16+ years old) who are unable to safeguard their own interests; who are at risk of harm; and, because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to harm than those who are not so affected. An ASP referral should be made if it is known or believed that the adult meets the 3-point criteria.
- The [Code of Practice](#) Code of Practice aims to reflect the developments in policy, practice and legislation both in the overall context of adult support and protection and in day-to-day activity. It provides information and detail to support practical application of the 2007 Act.
- The Act Against Harm website ([Home - Act Against Harm](#)) provides more information about Adult Support and Protection nationally and includes contact details for referral pathways to all of Scotland's local authority areas.”

- [The Practitioner Guidance on Criminal Exploitation](#) helps practitioners and frontline staff to identify and support those at risk of serious organised crime and criminal exploitation.

Northern Ireland

For more information on how safeguarding is managed within Northern Ireland, please visit:

- [Regional Child Protection Procedures](#) and [Co-operating to Safeguard Children and Young People in Northern Ireland](#) for children and young people.
- <https://www.nidirect.gov.uk/articles/recognising-adult-abuse-exploitation-and-neglect> for information on adult safeguarding. In addition, Adult Protection Gateway teams can be reached using the below information:
 - Belfast Trust - 028 9504 999,
 - Southern Trust - 028 3756 4423,
 - Western Trust - 028 7161 1366,
 - Northern Trust - 028 9441 3659,
 - South Eastern Trust – 028 9250 1227.
 - Out of hours (after 5.00pm) Regional Emergency Social Work Service – 028 9504 999.