NATIONAL TRADING STANDARDS
Scams Team

National Trading Standards (NTS) Scams Team ‘Coercion and control in financial abuse; learning from domestic abuse’

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About the Authors

Jennifer Hawkswood

My passion for tackling financial abuse comes from seeing first-hand the devastating impact it has on individuals, coupled with experiencing frustration in my own practice and those around me when trying to empower, support and protect victims. Having worked in adult safeguarding on the frontline for several years I often likened financial abuse investigations to 'wading through treacle' and felt an acute sense of something missing when it came to best practice examples and training. I have had the good fortune to collaborate with leading experts Professor Keith Brown, Dr Elisabeth Carter, and the National Scams Team in producing this report and I hope that it goes some way to providing both practical and theoretical guidance to everyone working to tackle this endemic problem.

Dr Elisabeth Carter

This publication addresses the stark reality of financial abuse in terms of prevalence, perpetrators, harm, and negative narratives around becoming a victim of this crime. Drawing on practitioner and academic expertise, this publication will take you through the key elements involved in financial and psychological abuse, and the effect this has on victims in terms of compelling them to comply with requests that will lead to their own exploitation. It is this apparent compliance that plays a big part in the misapprehension that financial abuse as somehow being the victim's fault; deepening the harm to the victim and creating barriers to reporting and access to sources of aftercare and support. For the first time, the links between financial abuse and other types of abuse (domestic violence and abuse, psychological abuse, grooming and coercive control) are made clear, and, crucially, this publication identifies how practitioners and organisations with a safeguarding duty can use this knowledge to improve practice in terms of safeguarding from financial abuse, and improving aftercare to better reflect the particular harms visited on victims of this crime and care and needs in recovery.

Professor Keith Brown

It has been a real delight and pleasure to work with Jennifer Hawkswood and Dr Elisabeth Carter to produce this new guidance looking at coercion and financial abuse. This is such an important area to raise both public and professional awareness in as the impact on victims is simply massive. Together we have a wealth of experience in these fields and over the years we have also become good friends as we work together in this area. So we have been delighted to produce this guidance for the National Trading Standards scams team. It is a genuine partnership of professionals committed to simply doing the 'Right Thing' and we trust this latest piece of work form us helps in the task of preventing this type of abuse and crime.

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Introduction

Fraud, scams and financial abuse devastate individual lives and costs the UK economy billions each year. The cost of scam victims' wellbeing has been calculated at £9.3 billion a year (Which 2021; BBC 2021) with figures for other types of financial abuse - such as that occurring in families - much harder to calculate. Recovering from financial abuse is especially problematic as it directly affects all other aspects of our lives - housing, health and wellbeing, employment, relationships.

There is growing awareness of the psychologically abusive elements of domestic abuse. In this report we will highlight that coercion and control is also prevalent in financial abuse. In doing so, we start to change perceptions about how we prevent and tackle financial abuse - including working with victims in a more empowering and less judgemental way. We will talk about how the language around scams can subtly blame the victim: asking 'why did they fall for it?' reminds us of the old 'why didn't they just leave?' approach to domestic abuse.

Shaming victims leads to stigma and underreporting which means we have minimal and poor-quality data in relation to financial abuse. We explain that we are only seeing the tip of the iceberg and the number of victims who have experienced financial abuse is far greater than current estimates. Lack of reporting leads to less priority and funding for tackling financial abuse. This leaves the door open for perpetrators to continue to wreak havoc in our lives and communities.

Our perceptions and the language we use about the nature and impact of financial abuse need updating. In this report we recommend that we need to draw on good practice from domestic abuse work to improve our strategies to reduce the risk and impact of financial abuse in our communities. The time to act is now – we have a 'perfect storm' of vulnerability coming our way. We have an ageing population including significant numbers of people living with cognitive decline, coupled with the Covid 19 pandemic and an increased cost of living. These factors are exacerbating already difficult situations for many. Financial abuse is set to continue to increase, and we cannot afford – literally – to under prioritise it.

Definitions

It is useful to highlight which **definitions and terms** we use in our work. The terms '**financial abuse**' and '**economic abuse**' have different connotations. Financial abuse is notably difficult to define: 'financial abuse can range from failure to access benefits, through inadvertent mismanagement and opportunistic exploitation to deliberate and targeted abuse, often accompanied by threats and intimidation' (Wilson and Brown 2003:11; Crosby et al 2008). It is recognised that the lack of definition of similar crimes such as rogue trading leads to uncertainty in recognising, reporting, evidence gathering and prosecution (Day 2015, 2019). The term economic abuse has been adopted by domestic abuse agencies as it 'covers the broad strata of financial harm previously understood under the term financial abuse but allows extension to cover issues involving coercive control' (Hourglass 2021: 5).

In our experience, '**scams**' and '**fraud**' are often used interchangeably. According to the Office of Fair Trading (OFT) 'there is no single commonly accepted or legal definition of a 'scam'. With no basic definition, there is room for interpretation as to what constitutes a scam, making objective measurement of their impact and prevalence more difficult' (OFT 2006: 11). However, OFT use a general definition of a scam as a 'misleading or deceptive business practice where you receive an unsolicited or uninvited contact (for example by email, letter, phone, or ad) and false promises are made to con you out of money'. (OFT 2006:11). We use their definition of scams in this report and use 'financial abuse' as an all-encompassing term for scams, all fraud affecting individuals and abuse involving money, goods, or assets within families.

We use our own term '**consumer vulnerability**' in a broad sense - referring to any situation in which an individual may be unable to engage effectively in a market and as a result, is at particularly high risk of getting a poor deal. This can be something as severe as becoming a victim of a crime or just not getting the best deal for them at the time. Situational vulnerability refers to the impact of financial abuse being amplified by the context in which it takes place. For example, being scammed and struggling more to pay your bills will have a higher impact during times of higher living costs.

We take our definition of **domestic abuse** from the legislation. The introduction of the Domestic Abuse Act 2021, brought with it a statutory definition of domestic abuse in UK law for the first time. Abuse is defined as "physical or sexual abuse, violence or threatening behaviour, controlling or coercive behaviour, economic abuse or psychological, emotional or other abuse" (CPS 2022). This applies if both people are aged 16 or over, and there is no upper age limit. The new definition is important as it 'emphasises that domestic abuse is not just physical violence, but can also take other forms such as emotional, controlling and coercive behaviour, and economic abuse' (CPS 2022).

Coercive and controlling behaviour is prevalent in both domestic and financial abuse. The UK Home Office definition of this behaviour is 'a range of acts designed to make a person subordinate and/or dependent by isolating them … exploiting their resources and capacities for personal gain' (Home Office 2015).

There are differing opinions on using ‘**victim**’ versus ‘**survivor**’ and we believe this should be the choice of the individual who has experienced the abuse. Nevertheless, for this report we have chosen to use ‘victim’. ‘

There are various terms to describe **the person acting abusively**. We use the term **perpetrator**.

The power of coercion and control

Coercion and control are used in both domestic and financial abuse. There are also differences in how agencies approach these concerns, and we seek to highlight this to learn from and utilise best practice.

How the abuse takes place

Victims of financial and domestic abuse will experience similar techniques used by perpetrators. In interviews with victims, Cross et al (2018) examined the links between romance fraud and domestic abuse ‘revealing similarities between the two in economic abuse, creation of fear, isolation, monopolization, degradation, psychological destabilization, emotional or interpersonal withdrawal and contingent expressions of love’ (Carter 2021: 284).

In their report on older victims of financial abuse, Age UK (2015) found that grooming takes place which is likely to involve ‘building friendship and trust, flattery, making victims feel indebted to them, as well seeking to isolate victims from their own networks’ (Age UK

2015:18). Grooming is a successful technique in the abuse of people - be it financial, domestic or both - because the victims feel the need to comply so strongly.

We know that domestic abuse escalates over time with the abuse forming patterns. Our experience of financial abuse is that it forms a similar pattern. This is supported by research into the financial abuse of older people, that it is 'a subtle, insidious crime that is much more likely to consist of a pattern of behaviour than a single incident' (Wilber and Reynolds 1996; Crosby et al 2008:16). We see this pattern of behaviour commonly in romance fraud which tends to happen over a longer period. 'Such scams have been described as offering a false relationship (Budd and Anderson 2009) and involve a scammer grooming an individual over time to make them believe that an emotional relationship exists, before the scam itself takes place' (Fenge and Lee 2018: 910).

Financial abuse may start as legitimate transactions with an escalation in cost and impact. As in domestic abuse, individuals may be (or feel) heavily reliant on perpetrators and don't want to risk losing relationships or support. 'When financial abuse co-occurs with physical abuse and/or neglect, it most often is committed by people living with the older person and seen as a carer or helper, yet they are often feared by the older person' (Jackson et al 2012; Davidson et al 2015:8). We see examples of perpetrators convincing victims that law enforcement and support agencies are seeking to harm the victim or remove their control over their own lives. During the Covid 19 pandemic loneliness and isolation became the norm for many of us - and for those in vulnerable circumstances the pandemic exacerbated this as perpetrators sought to use the national restrictions to their own advantage. Perpetrators in both abuses use isolation for the manipulation to remain secret and therefore effective. They may target people who are already isolated 'people who are more socially isolated may well be more vulnerable to fraud, for instance, if they have little chance to discuss matters with others' (Age UK 2015:11) or isolate people who were previously connected and supported by others. The grooming is often so successful victims isolate themselves. In their study of scam victims (OFT) found that 'it was striking how some scam victims kept their decision to respond private and avoided speaking about it with family members or friends. It was almost as if with some part of their minds, they knew that what they were doing was unwise, and they feared the confirmation of that that another person would have offered' (OFT 2009:7).

In Carter's (2021) study on victims of romance fraud, we see examples of perpetrators reacting strongly when victims say they have talked to loved ones, often using the reasoning that the loved ones might want to destroy the 'blossoming' relationship for their own gains. This embeds a 'culture of secrecy in their communications without explicitly demanding it and causing alarm. It also assigns the fraudster's actions as the responsibility of the victim, again similar to the manipulative behaviours of coercive control' (Home Office 2015; Carter 2021: 296).

Manipulation

Manipulation can be explicit or implicit - the latter is a technique used by perpetrators to narrow the victim's options by making them feel as if trying to protect themselves is a character flaw. For example, a victim could ask to meet a fraudster before handing over money or question their partner why they are asking for money. This is then portrayed by the perpetrator as the victim being untrusting and creating conflict in an otherwise apparently harmonious relationship. 'Invoking guilt can provoke a need to 'make it up' to the aggressor (Baumeister et al 1995)…reminiscent of unrealistic expectations placed on victims of domestic abuse by their abusers' (Williamson 2010; Carter 2021:290).

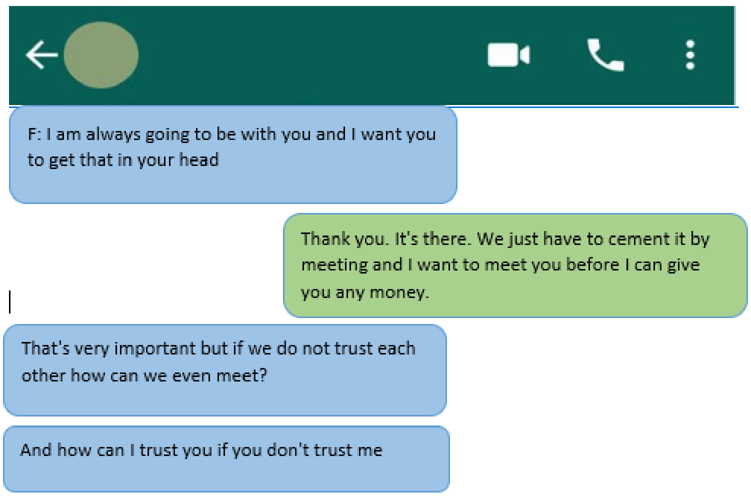
Gaslighting and distorted reality

A key tactic used in both domestic abuse and romance fraud is distorting the victim's reality. The victim is made to doubt themselves, and their recall of past events. It is a usually subtle form of emotional abuse. This could be information that appears to be innocent being introduced early in the relationship and then referred to with developments as time progresses, each time referred back to as truth, or outright denial of the truth by the perpetrator. This is at odds with the victims' version of reality, but the insidious and subtle nature of the tactic means they begin to think their version is wrong and the perpetrator's right- in a type of 'creeping normality' (Diamond 2005) where the victim is unable to recognise the situation is becoming unsafe (Carter 2021).

It is a successful technique because it creates an environment for the perpetrators of both types of abuse to 'cultivate a distorted version of reality where requests, demands and controlling behaviours are recast as calls to meet the ordinary requirements of attending to a relationship or the reasonable result of business ebbs and flows' (Carter 2021: 287).

In the example below, we see the victim attempting to protect themselves by asking to meet before money is sent. This is a legitimate request. However the fraudster twists this into an attack on the victim, claiming they (the fraudster) now can't trust the victim.

Example of romance fraud tactics



(Carter 2021)

Bombardment of the victim and visceral responses

Often called 'love bombing' in domestic abuse, this is where the victim is overwhelmed by attention from the perpetrator - compliments, gifts, treats, affection, increased communication. It is used to win over the victim's trust and affection and perpetrators will become angry if the victim does not give them sole attention. Perpetrators of both abuses use language that provokes immediate emotional responses from victims. These techniques 'often address basic human desires and needs (such as greed, fear, avoidance of physical pain, or to feel liked or loved). This can provoke basic visceral (intuitive) reactions' in the victim (Langenderfer and Shimp 2001; OFT 2009:26), but is also something that is replicated by perpetrators in order to appear vulnerable and draw a protective response and compliance from the victim (Carter, 2021).

Perpetrators may claim that their own life/health is at immediate risk and make the victim feel as though they are the only person who can help; drawing them further into the situation and towards the perpetrator. Likewise, they will often cut off communication suddenly to provoke anxiety in the victim - coined emotional or interpersonal withdrawal. 'Psychological abuse also involves passive tactics. Romance fraud offenders periodically cut off communication. This resulted in victims becoming anxious about the status of their relationship or the well-being of the offender' (ABC News 2018).

Phone scammers commonly call victims at night - when victims are more likely to be alone - and purposely causing insomnia and sleep deprivation to push the victim into an exhausted state where abuse and distortion of reality are easier to achieve.

This is part of a cycle of abuse where the other stages are tension building, eruption of anger/abuse, calm/love bombing stage/remorse. In scams we often see that an urgent response is apparently required, leaving no room for the victim to have breathing space to think.

Where the abuse takes place & who perpetrators are

The lack of physical proximity between perpetrators and victims is another area of similarity. In research about older people, financial abuse was stated to be different from other forms of abuse 'as it can occur remotely from the older person, is diverse in nature and is perpetrated in multiple ways' (Phelan et al 2018:933). Similarly economic abuse is particularly common post-separation as, unlike some other forms of abuse, 'the perpetrator does not need physical proximity in order to perpetrate this form of abuse' (Butt et al 2020:37).

There are more similarities to be found when we look at other types of financial abuse occurring in people's own homes - families defrauding, stealing and misappropriating funds from relatives. Domestic abuse is defined in the legislation as between two people who are 'personally connected' - perpetrators of financial abuse within families are clearly known to the victim. Hourglass's report on older people and economic abuse found that 'economic abuse appears to be usually committed in relative secrecy, and by trusted family members, carers, or friends. The majority of perpetrators in Hourglass' data from 2020 were sons and/or daughters or other family members' (Hourglass 2020:7).

As in domestic abuse, financial abuse between family members can easily be reframed as a family spat, relatives fighting over money, debt, and therefore hard to spot. It can be even harder to identify for the individual - coming as it does from someone close to them. Because this type of abuse is not from the 'outside' it's often not seen as scary or damaging, whereas in reality, with abuse from inside your family or inside your home there is no escape. 'The most common location of abuse risk (is) the person's own home at 43.8% (Safeguarding Adults Collection (SAC) 2019-20) and most perpetrators of abuse are well known to their victim' (Brown et al 2021:17).

Victim blaming and shaming

Victims of financial abuse are often blamed, drawing a further parallel with domestic abuse. The adage 'why didn't they leave?' (an abusive relationship) translates to 'why did they fall for it?'(the scam). Victims can be labelled as naïve, stupid or greedy 'however, such labels are unhelpful and superficial generalisations that presume all of us are perfectly rational consumers, ignoring the fact that all of us are vulnerable to a persuasive approach at one time or another' (OFT 2009:5) This links to the need to recognise that vulnerability has evolved - it is situational, and our approaches have to evolve as it changes.

The language and labels we attach to abuse are important 'words such as "scam", "con", "swindle", "bamboozle" and "cheat" are sometimes used to describe fraud. The slang nature of these terms can often hide the seriousness of the crimes they represent' (National Fraud Authority 2013; Age UK 2015:24, Carter 2022). Similarly in domestic abuse, assault may be referred to as 'a domestic' 'an argument that got out of hand'. These terms downplay the significance and often criminal nature of the abuse. There can be a lack of understanding by the police and other agencies. This could be based on stereotypes about class - links to poverty, education (or perceived lack of). This is despite research showing we are all at risk of being scammed regardless of class. The narrative of blaming the victim is dangerous and misleading. It takes attention away from the cause of the problem - the perpetrator. 'Developing understandings of the crime by the victim's actions (or inactions) sits parallel with the victim-blaming perspective of rape culture, an historically prevalent narrative that now proliferates social media more readily than anti-victim-blaming messages (Stubbs-Richardson et al. 2018; Carter 2021: 285). Ironically, victims of particular types of financial abuse may be more likely to be financially literate in the first place, 'the more financially sophisticated a person is, the more likely they are to become a victim of investment fraud, highlighting the sophistication of fraudsters' (Age UK 2015:18). These findings were an echo of earlier research we found that suggested that 'scam victims often have better than average background knowledge in the area of the scam content' (OFT 2009:7).

The reason why frauds are so successful is nothing to do with the capabilities of the victim. It's to do with the fraudster's ability to groom people into thinking they're making good, reasonable choices and making reasoned, empowered decisions. 'The transformation from ordinarily unproblematic to apparently poor decision-making may not be due to the victim's over-romantic ideations (Lea et al. 2009a, Buchanan and Whitty 2013) but rather the skill of the fraudster' (Carter 2021:297).

We must realise that if individuals could see that they are being groomed and manipulated, it wouldn't happen in the first place. If the victim does realise their situation, deep feelings of shame can occur: 'why did I agree to it?' 'why didn't I trust myself?'. Victims may be anxious about being deemed to be incapable of managing their affairs because they have 'fallen for the trick', or simply not believed - especially prevalent in older generations - 'because of their age and perceived or real cognitive impairments, older people often find it hard to make other people believe them. Even the fear that this might be the case can be a disincentive to reporting abuse' (Davidson et al 2015:11). There are similarities here with domestic abuse victims who may be worried that unless they can evidence harm they won't be believed or are fearful that their abilities as a parent will be in question due to the relationship they have with a partner. Both act as barriers to accessing/accepting help. There may be more shame if 'romance' has been involved - feeling duped both financially and romantically.

Vulnerable circumstances and repeat victims

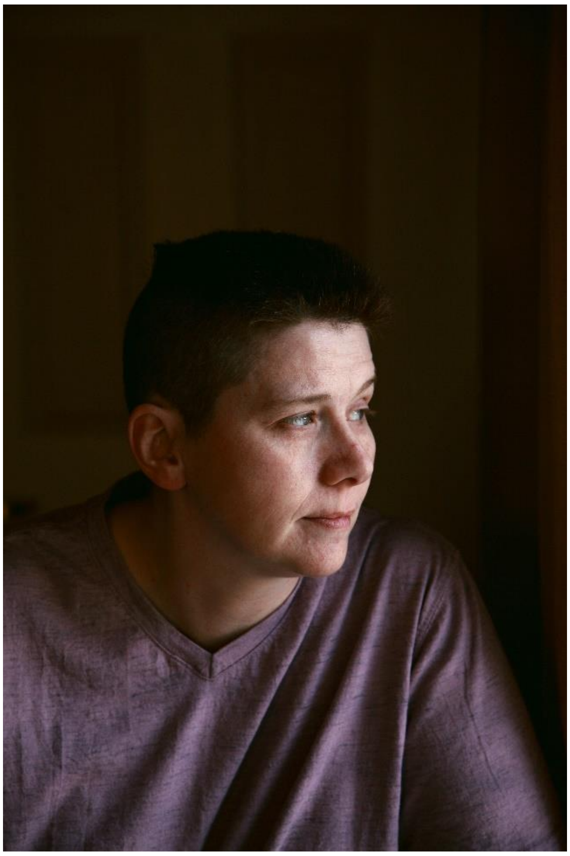
We all move in and out of vulnerable circumstances. Life events - bereavement, divorce, redundancy - these difficult events (and so many more) can increase anyone's susceptibility to financial abuse. The Covid 19 pandemic has brought with it a mental health crisis and an increased cost of living - and before that the UK had the Brexit uncertainty. These situational and marketplace vulnerabilities have increased the impact of financial abuse on victims, and caused further pressure on already struggling public services in dealing with the abuse and its impact. In addition, we know that people can be repeat victims of scamming. This can also be referred to as 'poly victimisation' or 'chronic victims'. We know in the case of scamming, 'people in vulnerable circumstances may be put on so-called 'suckers lists' that are used and shared by fraudsters…This can lead to people being repeatedly targeted…people becoming 'chronic victims' (Age UK 2015:7).

Such circumstances usually involve bereavement, loneliness and/or cognitive decline. 'Scammers use psychological insights to appeal to fundamental human needs and urges, and deliberately take advantage of the impact of personal circumstances, such as poverty or life transitions such as bereavement, which can undermine an individual's self-esteem leaving them vulnerable to exploitation' (Lee et al 2018a:50).

People who respond to scams may be placed on these lists which are sold on and lead to repeated targeting - 'nearly 200,000 people - with an average age of 74 - have been seen on so-called "suckers lists" circulated by fraudsters' (BBC 2015).OFT research in 2006 found that '52 per cent of victims had been targeted again by a scam and that, on average, a victim had a 30 per cent chance of falling for another scam within the following 12 months' [we note the use of 'falling for' as unhelpful language] (OFT 2006:40). Their research states that repeat victims are usually in declining mental health and/or isolated socially and elderly. 'Very often a chronic scam victim will not recognise that they have in fact been a victim of scams, even when confronted with overwhelming evidence…This phenomenon is sometimes referred to as the 'rationalisation trap', whereby the person cannot admit to themselves that they are the victim of a scam without making the psychologically painful admission that they have lost most of their money'(OFT 2006:40). There can be considerable difficulties for professionals in determining whether a victim is caught in this 'rationalisation trap' or lacks the capacity to make a relevant decision about ongoing scam involvement. This dilemma is covered later in this report.

We know that 'if a person's capacity is limited, compromised or fluctuating they may be at increased risk of abuse' (Brammer and Pritchard-Jones 2019; Lee et al 2020:15). In research by the Alzheimer's Society in 2011, they found that of those (people with dementia) surveyed, 76% experienced some difficulties in managing their money' (Alzheimer's Society 2011:20). It is unhelpful when people are asked to make important legitimate financial decisions on imperfect, unclear and inaccessible language. How financial institutions understand and support customers in vulnerable circumstances is worthy of further consideration.

How we talk to victims



We all need to challenge our traditional way of working with victims of financial abuse. We know from our experiences, supported by research, that the extent of grooming can be so significant the victim is experiencing a distorted reality and therefore our usual interventions are likely to be less effective. ‘The analyses (of romance fraud examples) reveal communicative techniques that deviate from traditional prevention and awareness - raising efforts and align with practices of coercive control and domestic violence and abuse’ (Carter 2021:287). Professionals need to be upskilled in communicating with those experiencing cognitive decline and coercion ‘victims of financial scams often find it hard to talk about their experiences and an individual with dementia may be experiencing even more distress because they already have difficulties in communicating their experiences’ (Fenge et al 2018:64).

We need to listen to victims, avoid telling them to end involvement with perpetrators - this is their decision - but do offer support with safe exit strategies instead. Taking time to acknowledge the victims’ feelings, that they may have been intimidated and could be very frightened, the presence of shame and embarrassment. Just as ending/escaping an abusive relationship takes time, ending involvement in financial abuse is not a quick process and professionals needs to be patient.

We know that it is much harder to help a victim of abuse (any type) extricate themselves once the relationship is established. We need to consider the usefulness of our preventative campaigns and literature for financial abuse with this in mind. ‘The moment at which fraudsters ask for money is consistently the focal point of prevention and awareness-raising literature. Common messages assume that the victim makes bad decisions within normal communicative frameworks and that they can step away from their entrenchment in an emotional manipulation in order to assess and remedy their situation' (Carter 2021:298).

If we start to see vulnerability as a temporary state (such as recent bereavement) this might help us to engage more productively with victims. Changes in adult social care terminology reflect this already - a move from 'vulnerable adults' to 'adults at risk' has taken place 'which moves the focus from notions of vulnerability, which has been associated with blaming the individual' (Lee et al 2018b:7). The presence of cognitive decline does not mean the victim was always vulnerable - or is beyond any financial capability now either. We also need to understand the marketplace we are living in, be aware of the evolving nature of financial abuse and design our services with the most vulnerable in mind.

Case study 'Tom'

Social services and Trading Standards visit Tom* who is 78 and lives alone after his wife died 2 years ago. He is a victim of an investment scam. He is adamant he has not been scammed and wants to continue his involvement. The workers explain that research shows that victims of investment scams are particularly financially savvy - and how the scammers keep using complimentary language to Tom in their emails. They explain that people who have been recently bereaved are often targeted, and Tom starts to see that he fits into both of these target audiences. Over time he talks about why he started responding - something to keep him busy and fill the long hours when he missed his wife - and agrees to have some time out of the house and feels he can leave it a bit longer before he responds next time the 'company' (scammers) get in touch. Workers check in with him after this delay and he tells them he didn't like the way the company called him so many times to chase payment and he's thinking twice about the 'investment' now. Here we can see Tom has started to create boundaries he feels comfortable with. He's started to see that perhaps this is not the right 'company' to invest in. He may never acknowledge he has been scammed but it is likely he will withdraw from giving them anymore money and be guarded next time a scammer contacts him.

The phrase 'good enough is good enough' comes to mind - are we expecting victims to come full circle and acknowledge the full extent of the financial abuse - are we allowing victims to successfully withdraw from engagement on their terms even if risk is not completely removed? In their (2018) study, Fenge and Lee found that there is an element of 'right person right time' - in these cases, professional intervention occurred at a time when the individual was ready to accept advice. However, for other participants, their loneliness and isolation were more enduring and impacted on their readiness to accept intervention to stop their contact with scammers' (Fenge and Lee 2018:913). What can we learn from domestic abuse best practice here? The importance of empathy, shared experiences and peer to peer support are vital and the recovery process for individuals needs attention.

Reporting

Financial abuse can also be a crime and yet we know that a large proportion is thought to be un-reported and responses to it differ according to postcode. ‘FA (financial abuse) is under-researched, under-reported, under-recognised and under-prosecuted’ (MetLife et al 2011; Phelan et al 2018:925).

Research by OFT in 2006 estimated ‘less than five per cent of victims had reported the scam to the authorities’ (OFT 2006:35). Action Fraud received 875,622 reports in 2020-21 (actionfraud.police.uk). The latest estimate from the Crime Survey of England and Wales (CSEW) is that there were 5.2 million fraud offences in the year ending December 2021 (ons.gov.uk). The crime survey is an estimate of all offences, not just those that are reported – but it relies on people recognising that they have been a victim, which we know is not always the case.

If financial abuse – of any type – is not reported, this means we are using poor-quality, small-scale research to base our policies on. We cannot have any confidence that our estimates of scale and impact are anywhere close and our projections for the future are wildly inaccurate as a result. Unless reports increase there will be little to no media coverage – leading to a public who are unaware of the significance of the problem. Surveys have shown that the public vastly underestimates the scale of fraud and does not recognise it as the crime they are most likely to experience. Professionals are also ill-equipped to meet the rising challenge of financial abuse.

Changes must also be made about how we expect people to report. If we use the example of romance fraud, we know anecdotally that it is more likely to be reported than scams targeting older people. This is because younger people are often targeted with this type of scam ‘the average dating scam victim is aged 49 and loses £10,000’ (Fenge et al 2018:125). The younger you are, the more capable you are of reporting (accessing online reporting tools, low levels of cognitive decline in younger populations). This leaves a risk that our data and preventative strategies will be focused on scams that affect younger people, ignoring the experiences and impact of older scam victims. We already know that the older you are, the less ability you have to recover money lost - no prospect of future earnings. You are less likely to be social medial/online savvy and there may be less peer to peer support available to you.

Cost and public health implications

Estimates of cost should be seen as just the tip of the iceberg. It can be difficult to find up to date statistics - for example in 2017 the Home Office stated that 'it is estimated fraud costs individuals in the UK 6.8 billion a year - around £225 per household or over £100 per person' (Home Office 2017) but we know that fraud has increased since then.
A more recent estimate is that 'fraud losses equate to 137 billion' (Gee and Button 2021:7) in total in the UK.

Which? published a report on the link between scam victimisation and wellbeing. They estimate the additional non-financial wellbeing cost of scams at £9.3bn for 3.7m incidents of fraud between 2019-20 (Which?2021).

We know that fraud has increased under Covid 19. Research published found a '19.8% increase in fraud due to Covid 19' (Office for National Statistics; Gee and Button 2021:7) and the Victims Commissioner (2021) published the following statistics in relation to the issue:

- From March 2020 to March 2021, the volume of fraud incidents increased by almost a quarter (24%), in part due to a boom in Covid-related scams.
- 4.6 million people are affected by fraud each year
- 700,000 victims a year are likely to be highly vulnerable to fraudulent crime and seriously harmed by it
- Fraud now accounts for 39% of all crime

(Victims Commissioner 2021)

Calculating costs from financial abuse is complicated by there being short- and long-term implications, both for individuals and society. Victims may be unaware or unwilling to disclose the extent of their losses. Scams also stop people from having money to spend on purchases and their trust in legitimate businesses is damaged. There is a significant impact on public services, both in the increased likelihood of needing services and the cost of detection, investigation, and prosecution. In the case of adult social care, charges for care and support can be applied to individuals but if they have lost money through being victim to financial abuse and crime the local authority will be paying the bill. 'In cases where an individual's assets have been reduced through involvement with scams the local authority may be required to fund services, at a cost to the public purse' (Fenge et al 2018:45).

Financial abuse 'may also create an increased financial dependency on government welfare systems' (SCIE 2011; Fenge et al 2018), while 'abuse itself has been linked to higher rates of hospitalisations' (Dong and Simon 2013; Phelan et al 2018:926). Age UK's 2015 report references a study by Greater Manchester Police into the impact of doorstep crime on older victims which 'showed that their health declines faster than nonvictims of a similar age' (Age UK et al 2015:21). This is echoed in other studies - Barratt (2012) found that 40% of victims of doorstep crime report a change in their quality of life and Thornton et al (2006) found that 10% had unexplained admissions to hospital within three months of the burglary. In the two years following a distraction burglary, victims are almost 2.5 times more likely to be in residential care or to have died than their nonvictim peers (Donaldson 2003; Fenge et al 2018).

In 2019 Trading Standards ran a Call Blocker Project targeting households receiving scam and nuisance phone calls and/or those who were susceptible to scams. Call blockers were applied with 99% of these calls being blocked. They found that applicants to the project had a considerably lower than average wellbeing score than the general population - this is before any intervention had taken place. After call blocker application, they found significant improvements to people's lives: 'average well-being scores had significantly increased bringing the sample in line with the general population… Less than 19% of vulnerable respondents and just 11% of those living alone remained on a low well-being score after three months' (Rosenorn-Lang et al 2020:2).
Their findings support the case for installing call blockers where people are receiving scam calls. Interestingly their project also highlighted how simply receiving these calls is detrimental to wellbeing - even when no money is lost.

Similarly, the National Trading Standards Doorstep Crime Project (2015) included a victim impact survey, which highlighted four significant impacts on health and well-being:

On a scale of 1 to 10, with 10 being the worst affected

- 50% rated the effect of the crime on them as between 6 and 10.
- 23% said it had affected their health.
- 38% said it had resulted in them having reduced confidence generally.
- 26% said it had left them feeling down or depressed.

(Fenge et al 2018:44)

If we use an average cost for a place at a care home of £1,500 per week, that is 75k per year just for one person. The cost implications to the public purse of those forced to move from their own home due to financial abuse are immense. We already have an ageing population and a struggling health/social care system - 'the profound and potentially long-term negative impact of scams on personal health and well-being makes scams a public health issue' (Fenge et al 2018:43).

Adult social care role and challenges

This links clearly to the role of adult social care - and their challenges in meeting this need. Despite high levels of underreporting, they are already seeing significant numbers of safeguarding referrals 'financial abuse, including scamming, is the second most common form of abuse experienced by adults at risk (SCIE 2011) with 16% of safeguarding enquiries concerning financial and material abuse' (Adult Social Care Statistics 2016; Fenge et al 2018:53).

The legislation

Section 42 of the Care Act 2014 defines the local authority duty to act where there are adult safeguarding concerns. The criteria for a safeguarding enquiry is where the local authority has 'reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)

(a) has needs for care and support (whether or not the authority is meeting any of those needs),
(b) is experiencing, or is at risk of, abuse or neglect, and
(c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The legislation specifically includes a description of financial abuse as including having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused (Care Act 2014). The accompanying guidance gives examples such as internet scamming, coercion in connection with wills, property, inheritance… 'and putting undue pressure on the older person to accept lower-cost/lower-quality services in order to preserve more financial resources to be passed to beneficiaries on death' (Davidson et al 2015:4).

The reason given for singling out this type of abuse for further explanation is ‘for the avoidance of doubt because some definitions of abuse may not ordinarily include this type of abuse’ (Care Act guidance 2014). This typifies the problem - financial abuse is often forgotten in the list of abuses despite its prevalence.

In determining if someone meets eligibility criteria for a safeguarding response, we may need to ask ourselves challenging questions about our understanding of financial abuse and the risk of it. Ash (2013) gives an example of a son regularly ‘borrowing’ his mother’s money without repaying it. If she is dependent on him for care and support which in turns helps her stay in her own home (preventing the need for residential care) ‘does this routine appropriation of cash become less abusive? Might it be expedient for social workers to ‘overlook’ a domestic situation which, if it collapsed, would present social services with dilemmas about how best to support an elder with complex needs in a resource-starved service world?’ (Ash 2013:101).

The Care Act 2014 guidance directly links safeguarding responsibilities with scam involvement ‘a scam, like any form of abuse, can be a one-off event or a longer-term interaction, resulting in chronic victimisation’ (SCIE, 2011; Fenge and Lee 2018:908). However, if a scamming victim does not appear to have a need for care and support and is living independently in their own home, what role does adult social care have here? Is being a victim of scamming enough to incite a response?

Inherent in the Care Act 2014 are the duties to prevent the need for care and support and to promote wellbeing. This means that local authorities should always have a person’s wellbeing in mind when making decisions and planning services, and must prevent needs from arising if they can. Financial abuse erodes people’s money and assets, and impacts heavily on mental health and independence. A person may not appear to need services at the point of the abuse taking place - so would not be eligible for a safeguarding response necessarily - but by the end of the abuse they are far more likely to need support. At which point therefore should we expect local authority involvement? ‘Within safeguarding practice, both a prevention focus and an early-intervention focus are imperative to enable the ability to respond as soon as possible in order to limit the exploitation of the older person’s finances and/or property’ (Phelan et al 2018:938).

In our experience local authorities and care providers deal with high levels of unpaid care fees. If a family member is responsible for paying the fees (from the person’s own funds) but debts are occurring, it may be dealt with by a finance department initially - before being passed to the adult safeguarding service if debts continue. Our interest is in how long that process takes - and if is happening quickly enough to safeguard someone’s finances - and if instead of handing over, joint working should be the norm. Social care staff confidence in discussing finances is highlighted in existing research ‘the lack of training and expertise in both asking the older person about finances and being able to decipher what could be FA (financial abuse’ was identified. This draws on a cultural reluctance and taboo to ask about private finances and this can be perceived as outside the remit of health and social care service’ (Phelan et al 2018:936). In contrast, financial assessment teams may be skilled in financial discussions but feeling out of depth with issues such as coercion and how they may be impacting on the financial situation.

For professionals tasked with supporting repeat victims, there can be considerable challenges in being able to differentiate between denial and an inability to decide. The Mental Capacity Act 2005 (MCA) provides a framework for deciding whether a person has or lacks capacity to make a decision and how decisions can be made in a person's best interests if required. The MCA 2005 is clear that people have the right to make unwise decisions and the Care Act 2014 reinforces the importance of 'Making Safeguarding Personal' - but both give little practical guidance on the issue of coercion impacting decision making. The code of practice for the MCA 2005 states that if an adult 'repeatedly makes unwise decisions which puts them at significant risk of harm or exploitation, or makes an unwise decision that is obviously irrational or out of character…… Further investigation regarding their capacity may be necessary' (Department for Constitutional Affairs 2007:25). We need to look at best practice in domestic abuse when we consider victims of financial abuse who appear to be making an unwise decision to continue to engage with the abuse. The impact of emotional abuse in the latter is often underestimated and assessing capacity in these scenarios is complex. We can also draw on examples from self-neglect here where people are apparently 'choosing' to live in ways that are harming them. Just as in those cases, capacity work has to be undertaken holistically. Decisions relating to financial abuse cannot be determined by a simple assessment of someone's understanding of coins, or their bank statement. If the money is being taken or misappropriated by a scam or a family member an element of grooming is likely to have taken place, so a distorted reality is in place. Undue influence needs to be considered in any assessment and opportunities for a breathing space away from the perpetrator sought to allow time for intervention to break through the distortion. It is also important not to make generalisations about cognitive impairments and abilities to manage finances 'Lichtenberg (2016) urges caution in making generalisations about cognitive impairment and financial decision-making ability, suggesting that each individual's right to autonomy be considered carefully in adult protection assessments. (Fenge and Lee 2018:911).

Returning to the earlier example from Ash (2013), if the woman cared for by her son was deemed to lack capacity in relation to the care, but clearly enjoyed the company of her son and wanted to stay in her home with his care, this poses challenges. Similar examples were discussed in another study of social care staff - 'the participants also indicated a dilemma where the older person could be 'happy' with the situation and there may be no negative physical or psychological symptoms, yet his/her finances are being used to fund the perpetrator's lifestyle and spend money without accountability' (Phelan et al 2018:935). In these cases what right do social workers (or others) have to insist on changes that could very well safeguard a person's finances and physical health - but make them miserable in the process and damage their relationship with family members. 'Consequently, there is a delicate balancing of outcomes and the need to maintain and sustain relationships can outweigh the desire to conserve finances' (Flynn 2007; Phelan et al 2018:935). In our experience there is often a lack of choice especially for older people. Faced with the apparent 'choices' of staying in an abusive relationship versus moving into residential care or receiving care at home from an agency with a high turnover of staff - many victims may 'choose' the former.

Successful ways of working

One example of a local authority's approach to tackling financial abuse and its associated debts is Norfolk County Council who have set up a team dedicated to making safeguarding enquiries about financial abuse. Although debt recovery is not the focus of the team, between 'August 2019 and August 2020 there has been a financial recovery to the local authority of £154,299.80 in one off payments and £19,338.09 in monthly payments' (Brown et al 2021:16). There are over three hundred local authorities in England alone, each trying to regain misappropriated funds and each experiencing their own financial hardship because of public sector cuts. We need more best practice examples like this to be shared and data captured.

Taking a strengths-based approach for financial abuse is likely to be effective. Understanding what increases someone's risk of the abuse is useful - but should be used with some caution to avoid labelling people as 'vulnerable' as if it were a permanent state - which for many, it isn't. If people have successfully avoided financial abuse for most of their lives, practitioners need to draw that out of them to build their self-esteem and resilience - or better still as a preventative tool when we come across the person in our day-to-day work. 'When considering involvement in a financial fraud or scam, it is therefore important to adopt a person-centred approach that acknowledges the intersection of various factors which contribute to individual vulnerability and individual assets which may support the individual to protect themselves and prevent victimisation' (Fenge and Lee 2018:909). Models that emphasise emotional vulnerability of victims 'tend to ignore the protective factors that older adults use to avoid financial exploitation (Ross et al., 2014). This suggests that practitioners should explore individual strengths and assets that support individuals to safeguard themselves' (Fenge and Lee 2018:911-12). This should include how we tackle loneliness and the perceived love/friendship between perpetrators and victims - both of which are central risk factors in financial abuse - and for adult social care this poses challenges in a resource starved world.

Using a trauma-informed approach in our work with victims of financial abuse helps us to avoid re-traumatising people– for example our use of language should not belittle or shame victims and should instead reassure, encourage and empower. Trauma informed approaches help practitioners to understand that the presenting issue may be as a result of how the victim has learnt to cope with life due to unprocessed trauma. This could be especially useful when working with repeat victims and we could again learn from self-neglect and domestic abuse best practice examples here.

In best practice examples, supporting victims to build resilience happens during a safeguarding process. In reality busy workers move onto the next crisis and this aftercare doesn't always happen. Our experiences are echoed in research: aftercare is rarely mentioned. The focus tends to be on prevention and identifying risk, with a notable lack of practical suggestions for how professionals should talk to victims and investigate financial abuse - including how to evidence it. This is despite repeated statements that the impact of financial abuse 'is often devastating in terms of future peace of mind and health. Victims can be left with damaged self-esteem and a reduced sense of self-worth. Victims suffer stress, anxiety and depression. Lives can be ruined' (OFT 2006:25). We know that in domestic abuse victims often feel trapped due to legitimate fears about how they will survive financially. Furthermore economic and psychological abuse often continue long after an abusive domestic relationship has ended. More needs to be done to help victims recover from all types of abuse. Carter (2021) had similar findings ‘while there is significant public-facing material on how to identify fraudulent activity and protect oneself from becoming a victim of fraud, there is limited evidence through which to create effective barriers to victimhood and remediate harm’ (Irvin-Erickson and Ricks 2019; Carter 2021:284).

One positive example of resilience building is the training that Trading Standards offer to people who have been or are at risk of being scammed, through their ‘Friends Against Scams’ (FAS) programme. This free course offers people a chance to become ‘scam aware’ and to pass their learning onto others. Their recent survey found that ‘prior to completing the training, 17% of respondents had lost money to a scam, totaling £77,858. Since completing the training less than 1% had lost money, totaling £1,000. This is a a 99% reduction in financial detriment to victims’ (FAS 2021:3).

A Friends Against Scams campaign found that for every Friend Against Scams £59 is the saving to the UK economy and ‘as of end of 2021, the total savings from people becoming Friends is over 51m’. (FAS 2021:3). Trading Standards have also trained their staff on the use of Cognitive Behavioural Therapy (CBT) to help staff challenge their own and victims’ harmful thinking about being scammed - with language playing a significant part in the technique. This uses a strengths-based approach to build resilience, and together with practical measures ends the cycle of repeat victims.

Police role and challenges

The Fraud Act 2006 created the following offences: fraud by false representation, fraud by failure to disclose information when there is a legal duty to do so and fraud by abuse of position (section 4). The later can be an omission as well as an act purposely carried out. The perpetrator is in a position where they were expected 'to safeguard, or not to act against, the financial interests of another person', abused the position, dishonestly, intending to make a gain/cause a loss' (CPS 2020). This applies to financial abuse in families and that by carers, people who hold power of attorney or deputyship. Under section 4 we see there are crossovers with theft legislation and the Court of Protection's (non-criminal) powers to remove attorneys and deputies acting abusively.

The key question here is how is the law being applied to cases of scams and financial abuse by family members? As one Age UK report stated 'there is a lack of understanding about financial abuse across police services, so reports can be turned away at the front desk, especially if they do not see it as very serious or involving large amounts of money' (Davidson et al 2015:17). The report goes on to suggest that more training is required for all agencies including how the police could collect evidence. The lack of prosecutions is highlighted in other research, with safeguarding staff indicating challenges in dealing with financial abuse are 'compounded by the fact that investigating and prosecuting FA (financial abuse) take time, which is limited in the busy caseloads of staff and resource demands' (Phelan et al 2018:932). According to the victim's commissioner, only '2% of police resources are allocated to fraud, with fewer than 8,000 prosecutions in 2019' (Victims Commissioner 2021).

We know that the police have made significant progress in their understanding and attitudes to domestic abuse, highlighted by the Coercive and Controlling Behaviour criminal legislation now in place. There is a growing understanding of economic abuse as part of domestic abuse which should be celebrated. We seek to replicate those successes in the financial abuse field.

Trading standards role and challenges

In many areas Trading Standards, police and adult social care departments work closely together. Joint working enables a sharing of knowledge, specialisms and skill. When repeat victims are of concern a multi-disciplinary approach is key. Not all areas across the country work in this joined up way and we see a clear need for increased multi-agency taskforces. Trading Standards staff are skilled in tackling the perpetrators head on - and play an important role in educating the public to be scam aware. Building on this good practice is the need to support their staff with using the Mental Capacity Act 2005, and how to work with victims using trauma and strengths-based approaches. In turn they have much to offer to adult social care staff on the types, nature and impact of scams and fraud. Training for both workforces should include focus on the psychological aspects of financial abuse - the grooming and isolation, and the impact of undue influence on decision making.

Practical changes we can make

There are clear similarities in how perpetrators of domestic and financial abuse act, and the long-term impacts of these abuses. However, there is significant disparity in how these two abuses are tackled by organisations. What best practice in domestic abuse can we learn from and replicate for financial abuse?

Multi agency tools

Within domestic abuse the Domestic Abuse Stalking and Harassment (DASH) risk assessment is used by agencies across the UK to define risk of domestic abuse and prompt possible further multi agency action. In financial abuse there are existing tools - The Older Adult Financial Abuse Measure and the Lichtenberg Financial Decision Screening Scale - but these are anecdotally not widely used. Existing research highlights the potential usefulness of such tools 'as professional knowledge and understanding of the risks posed by financial exploitation of older people increase, new tools that support understanding of the complexities of financial decision making may aid professional understanding of individual vulnerability' (Fenge and Lee 2018:918). There is certainly an argument for further exploration of current UK use of such tools within and between agencies 'having detection systems in place, such as using the Older Adult Financial Exploitation Measure (Conrad et al., 2010), can both alert to the suspicion of FA (financial abuse), but also stimulate a conversation to increase the older person's awareness' (Phelan et al 2018:927). Similarly, we discussed earlier the complexity of assessing capacity in relation to financial abuse and it is likely that in these scenarios multi agency input would be beneficial 'requesting joint assessments and transdisciplinary case discussions can address difficulties…and promote a unified care plan. In this way, FA (financial abuse) can be more comprehensively addressed and older people and their assets protected, where necessary' (Phelan et al 2018:938).

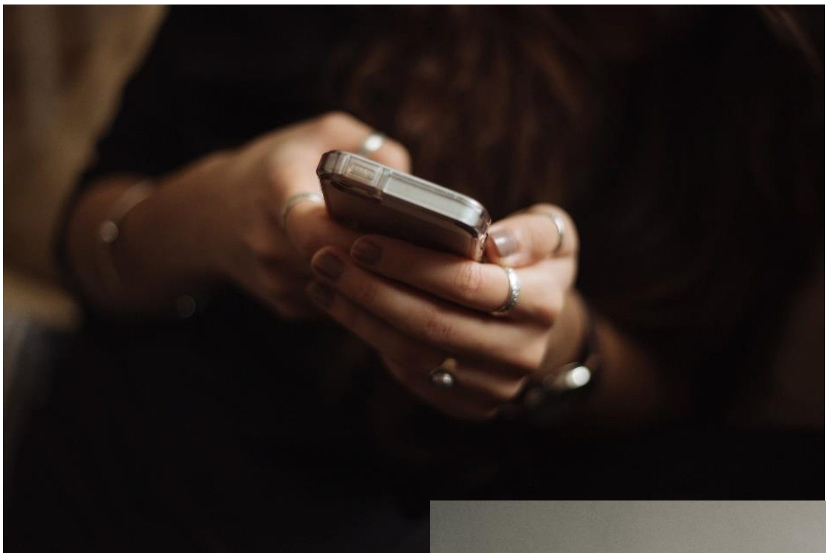
In addition to standardised assessments, we can also learn from multi agency strategies in domestic abuse work. Multi Agency Risk Assessment Conferences (MARAC) are standardised multiagency meetings which consider cases of high-risk domestic abuse in the local area. There are all relevant agencies in attendance including advocates for the victims. The purpose is to share relevant information to gauge nature and level of risk and agree what support/actions to offer. In dealing with scams and fraud there are numerous organisations involved; Trading Standards, Action Fraud, police departments (the latter often focusing on large scale financial crime though) and adult safeguarding services. However, they often work in silo, without the structure of multi-agency working being embedded in practice. Despite this, there are good examples emerging of multi-agency working in relation to fraud. While they differ in form, these approaches aim to bring together the public and third sector agencies that work to prevent fraud and support victims to create a more joined-up approach. A pilot in North Yorkshire and Lincolnshire supported by National Trading Standards demonstrated the effectiveness of greater multi-agency working – over two years the pilots saved £8m for individuals and society. Both areas delivered more consistent victim support, better intelligence and investigations, and reached more people in their local communities with clear and consistent prevention messages. Bringing together limited resources and pooling expertise in this way can ensure that victims get the right level of support from the right agency first time. This approach is now being rolled out to all police force areas in England and Wales with the support of National Trading Standards.

Where financial abuse is perpetrated by a family member, there is less resource to call on. Cases of this nature tend to be dealt with almost entirely by local authorities with some handled by the Office of the Public Guardian (OPG) if it involves abuse of power of attorney or deputyship. Where there are crossovers between agencies in terms of responsibilities this can lead to victims falling through gaps - each agency thinking the other is handling the situation. Wilson et al. (2003) explore the links between the Office of the Public Guardian and social services. They found a risk 'that (they) work in isolation from each other… In some cases overlapping responsibilities might provide additional protection but there is also potential for gaps to appear where roles are unclear'. They recommend 'increased collaboration…misunderstandings can easily occur when work is jointly undertaken across boundaries' (Crosby et al 2008:30). Similarly, under section 4 of the Fraud Act 2006 there are also crossovers with criminal legislation and the Court of Protection's (non-criminal) powers to remove attorneys and deputies acting abusively.

Safeguarding boards

One way to address crossovers and increase multiagency working would be to use Adult Safeguarding Boards. Section 43 of the Care Act 2014 requires every local authority in England and Wales to establish a board which acts strategically to support adult safeguarding arrangements in its area through a multi-agency approach with partners. In their 2015 report, Age UK recommended that 'financial abuse should be a more proactive part of Safeguarding Boards' remits' (Davidson et al 2015:17). Key partners already attend - the police, health, adult social care. Currently Trading Standards can be invited to attend - but their participation is likely limited due to pressures on small teams.

We know that financial abuse has significant public health implications - financial abuse victims commonly experience mental health deterioration after or during the abuse, and studies indicate this can lead to earlier admissions to care homes, more reliance on the NHS. 'Elderly victims are 2.4 times more likely to die or go into a care home than those who are not scammed' (National Trading Standards Scam Team 2019:2). The longer term impact of this often hidden abuse needs to be recognised by safeguarding boards who have a strategic and useful role to play in spreading awareness, collecting and analysing data and supporting key agencies to act efficiently in cases of financial abuse. Many safeguarding boards will choose a safeguarding area to prioritise for the following year, such as domestic abuse or self-neglect. We encourage safeguarding adults boards to ensure that scams and fraud, particularly in the context of coercive control, is made one of their priority areas. The impact of this type of activity is massive and wreaks havoc in citizens lives and thus we must do all we possibly can to raise awareness and reduce this type of crime.



Conclusion

There are clear parallels in the way perpetrators of both financial and domestic abuse use coercion and control. We know that financial abuse ruins lives and despite underreporting, it is one of the most commonly reported concerns across agencies. Our report shows that traditional approaches to financial abuse need to be updated and our professional workforces upskilled to meet this challenge. We know it is chronically underreported and the implications of that are far reaching. Our estimates at the cost of financial abuse are likely to be far below the actual numbers and we must urge policy makers to take this into account. We argue that there is room for consideration of more effective, standardised multi-agency assessments and processes, and wider attention given to the public health implications. Good practice examples are out there already to learn from - Friends Against Scams, dedicated teams within local authorities on tackling financial abuse - but these are few and far between. We know that the police and other agencies have adopted new and refreshing approaches to tackling domestic abuse and this report argues we need to learn from and mirror those examples. We recommend that adult safeguarding boards take an active role, using their unique skill set and strategic oversight to tackle financial abuse in their communities and contribute to national work in the area.

We have highlighted the importance of changing the language we use with victims of all types of financial abuse and the need to increase our capabilities in both prevention and building resilience. What steps can we take to challenge our own and public perceptions about families feeling entitled to an inheritance, or assumptions that only naïve or greedy people are victim to scams? We ask for special attention to be given to repeat victims and we must all work together to better understand and be able to offer protection to that oft-invisible group. We acknowledge that there is also learning to be had regarding culture, ethnicity and gender relating to financial abuse. This is worthy of an entire report in itself, we have chosen to concentrate on age as the dominant consideration for this work - but those areas need further exploration too.

Ultimately we draw attention to the ways in which we can all work together to improve our awareness of financial abuse and leave no stone unturned in our explorations of the nature and impact of this devastating abuse.

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