

**BIRMINGHAM CITY COUNCIL**

**REPORT OF DIRECTOR OF REGULATION AND ENFORCEMENT  
TO THE LICENSING AND PUBLIC PROTECTION COMMITTEE**

**15 MARCH 2023**  
**ALL WARDS AFFECTED**

**BIRMINGHAM CITY COUNCIL HOSTED  
ENGLAND ILLEGAL MONEY LENDING TEAM**

**1. Summary**

- 1.1 This report provides an update on the work of the England Illegal Money Lending Team (IMLT) hosted by Birmingham City Council's Regulation and Enforcement Division up to 6<sup>th</sup> February 2023.

**2. Recommendation**

- 2.1 That the report be noted.

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### **3. Background**

- 3.1 This grant funded project was initially piloted in 2004 with teams from Birmingham and Glasgow operating across a specific region. The purpose was to identify if illegal money lending was in operation and, if so, investigate and institute proceedings against those involved. The project was commissioned for an initial period of two years. It was further extended year to year following a number of high-profile successful investigations until 201 when the grant was made permanent..
- 3.2 There are also national teams covering both Scotland and Wales, along with a service covering Northern Ireland. All of the teams regularly hold meetings, to share best practice and current initiatives.
- 3.3 The IMLT (England) operates across the country using legislative powers under the Consumer Rights Act 2015.
- 3.4 The brief of the IMLT, from its inception, has been to investigate and prosecute illegal money lenders and to provide support to victims and communities under the control of illegal money lenders and by working with partner agencies to deliver this support. From an initial team of seven officers, the team has grown in size and now employs 60 staff in a variety of roles, including four apprentices.
- 3.5 Initially officers gather and develop intelligence by working with local services with the aim of corroborating information, warrants are executed and, where appropriate, cases taken into the court process. Another branch of the team (LIAISE officers) support loan shark victims throughout the process and raise awareness, with local, regional and national services, regarding the work of the team.
- 3.6 Since its inception the team has secured over 400 prosecutions for illegal money lending and related activity, leading to 5 86 years' worth of custodial sentences. They have written off £87 million worth of illegal debt and helped over 35,000 people.
- 3.7 The primary legislation governing the consumer credit industry is the Financial Services and Markets Act 2000 (FSMA), previously the Consumer Credit Act 1974. The Trading Standards Service has a duty to enforce this legislation within its area.
- 3.8 The Financial Services Act 2012 amended the legislation to move the authorisation process under FSMA and retained the enforcement provisions in respect of unauthorised business for local weights and measures authorities (Trading Standards). The Financial Services Act also made provision for Trading Standards to operate nationally in this regard in order to make the administration process easier for the EIMLT (England Illegal Money Lending Team).

- 3.9 A fundamental requirement of FSMA is that all potential providers of credit must possess appropriate authority issued by the Financial Conduct Authority. To operate a credit business without authority is a criminal offence which carries a maximum penalty of a £5,000 fine and/or up to two years in prison.
- 3.10 Illegal money lenders, or “loan sharks” as they are more commonly known, have long been recognised as the most unacceptable part of the illegitimate consumer credit industry. Targeting vulnerable communities and individuals, charging exorbitant rates of interest, and using whatever means including, at times, fear and intimidation to recover monies ‘owed’. Controlling lives and the community are common traits that illegal money lenders will exhibit during their operations.
- 3.11 When the team was initially set up in 2004 there was little knowledge about the scale of illegal money lending, either in the number of individuals involved or the number of possible victims across the country. Illegal money lenders were rarely, if ever, prosecuted due to victims being reluctant to come forward. Birmingham City Council has now prosecuted over 400 individuals and disrupted many more illegal lenders, stopping the pernicious enterprise.
- 3.12 As well as the work of the team, the government commissioned independent research by Bristol University (POLICIS) in 2010 which has shown that around 310,000 households across the UK were indebted to illegal money lenders. Work carried out by the team indicates that each person borrowing from an illegal money lender typically has an average loan of £350 each time and pays back double the amount. Roll over loans are common, and this means that a person will have 3½ loans annually from the illegal lender. This equates to £1,225 borrowed paying back £2,450.
- 3.13 New research by the Centre for Social Justice in March 2022 concluded that 1.08 million people in England alone are currently using loan sharks. This equates to 2% of the population and is more than a 3-fold rise in the previous figure.
- 3.14 Typically, illegal money lenders: -
- Start out being friendly – they are often heard of via friends. It is only when repayments are missed their behaviour changes.
  - Offer little or no paperwork.
  - Increase the debt or add additional amounts.
  - Refuse to tell the borrower the interest rate, how much they still owe or how long they will be paying back. (We have seen APR’s as high as 4.5 million %).
  - Take items as security - this may include passports, driving licences or even bank or post office cards with the PIN to withdraw directly from borrower’s accounts.
  - Sometimes resort to intimidation, threats or violence.

- 3.15 Throughout its life the project has been funded by central government. This funding was always on a yearly basis and subject to annual submissions which meant the team's grant was never secure long term. However, in 2016 it was announced that a levy would be applied to credit businesses (as part of the fee they already pay to operate legitimately). This funding commenced on 1 April 2017 and has secured the work of investigating illegal lenders. The current budget for IMLT activities is £4,546,511.

#### **4. Operating the Illegal Money Lending Team**

- 4.1 The success of the team can be attributed to several factors, the quality of the intelligence gathered, the hotline and dedicated website, social media, partner engagement and partner participation. These relationships are developed and grown by the Liaise Officers (Leads in Awareness, Intelligence, Support and Education).
- 4.2 The Stop Loan Sharks brand was first introduced back in 2004 and has continued to be developed since its inception. The team has a social media presence including Facebook, YouTube, Instagram, Snapchat and Twitter accounts, as well as its own website and TikTok accounts.
- 4.3 The team takes a fully agile and flexible approach to tackling this type of criminality, recognising the "one hat size does not fit all" circumstances. The legislation changes under the Consumer Rights Act 2015 to provide authorisation for Birmingham City Council to operate across England and Wales in respect of offences under the Financial Services and Markets Act 2000 (FSMA), changes that were introduced to lighten the administrative burden on the team and allow them to fully function in all geographical areas.
- 4.4 The Head of Service and Operational Managers within the team have the delegated authority to proffer charges at police stations, institute proceedings through the report process and make decisions regarding the outcome of investigations throughout the process. This authority speeds up the court process, allowing, in some cases, suspects to be arrested, interviewed and charged the same day. In some instances, the defendant has been brought before the courts within 24 hours.
- 4.5 Recognising the importance of communication in all aspects of the team's work has also been a key priority. The hotline is 24/7 and staffed by the team members. This promotes reassurance and allows for information to be fed directly to lead investigating officers in respect of the actions of the suspected illegal money lenders. IMLT introduced Live Chat on their website during lockdown in 2020, and 10% of intelligence now comes into the team through this channel.

- 4.6 The investigations by the team have resulted in a number of high-profile court cases that have included serious criminal offences, investigated and prosecuted by Birmingham City Council. The strategy to prosecute for all matters has resulted in the prosecution of offences that may not normally be associated with a Trading Standards service. The decisions to prosecute offences such as rape, blackmail, kidnapping, wounding and assault were made after careful consideration and in consultation with Legal Services. It was recognised that these offences were directly linked with illegal money lending and occurred as a direct result of the involvement with this activity.
- 4.7 Raising awareness of the team with the public, but also with other interested parties has been critical for gathering the right intelligence. The involvement of the police and support furnished by them throughout the operations has been extremely beneficial, and the embedded Police Officers (first introduced by the Birmingham project) have given the team an added dimension to its investigatory powers.
- 4.8 Some examples of recent cases include:-
- Operation Mamba (North West): Officers from the IMLT worked in partnership with Merseyside Police to execute search warrants at a residential address in West Derby and two business premises in Rock Ferry. A large quantity of documentation and electronic devices were seized by officers after conducting searches at the addresses. The IMLT worked in partnership with Trading Standards teams from both Liverpool City Council and Wirral Council. The 51-year-old suspect was charged with illegal money lending and money laundering offences. The case has been referred to the Crown Court for sentencing on 20<sup>th</sup> February 2023.
  - Operation Dinsdale (Greater London): On 27<sup>th</sup> May 2022, Floridel Atilano, 58, residing in Wandsworth, was sentenced to a 12-month community order and ordered to complete 150 hours of unpaid work, following a hearing at Snaresbrook Crown Court. The case was prosecuted by the IMLT in partnership with the London Borough of Merton, Richmond upon Thames & Wandsworth Regulatory Services and the Metropolitan Police.
  - Operation Birch Grove (Greater London): On 5<sup>th</sup> May 2022, a male aged 51, was sentenced for running an illegal money lending scheme for seven years, in which he dealt interest-only loans without permission from the Financial Conduct Authority (FCA). He appeared at Harrow Crown Court where he was sentenced to 17 months in prison, suspended for 18 months and ordered to do 200 hours of unpaid work. The case was prosecuted by the IMLT, in partnership with Brent and Harrow Trading Standards and the Metropolitan Police. A Proceeds of Crime Act (POCA) confiscation timetable was set out by the court to recover the gains the illegal lender made.

- 4.9 Between January 2022 and December 2022 the team received 476 reports of illegal money lending across England. However, the team like all agencies have been hindered by the pandemic, causing backlogs in the courts and this had an impact on operations.
- 4.10 In 2022 the team was legally challenged regarding its ability to operate outside of the Birmingham area, across England, and the matters were heard at the Court of Appeal on two occasions. Whilst the challenges were overruled by the court, potential further legal challenges and appeals are still ongoing.

## **5. Victim Contacts**

- 5.1 There were 311 contacts with victims in 2022. Many of these referrals to the LIAISE team were to offer emotional support and safety advice, but there were also referrals by LIAISE officers to credit unions, housing, debt advice and mental health services. This demonstrates the need for effective relationships with local partners to secure this support for victims.
- 5.2 The team dealt with £729,101 of new victim debt in 2022.
- 5.3 Some examples of victim support are below:-

### Operation Rampike

There are several victims in the case receiving support from the LIAISE officer. Victim one is claiming benefits and living in social housing with three children. One child must attend hospital out of area on a regular basis.

The victim has various non-priority debts totalling over £20,000 and is currently struggling with their debt arrangement with a debt management company. They have loans over a 19-year period from the illegal lender and their ex-partner's debt has been added to their balance. LIAISE have referred this victim to Citizen Advice for assistance with debt and budgeting, and support with attending hospital.

Another victim is currently claiming benefits and lives in social housing with three children. They have no priority debts but have various non-priority debts with previous gas and electric suppliers, water company etc. They are struggling with the payment arrangement to clear their previous utility debts.

This victim had been borrowing from the illegal lender over the last 10 years. It came as a complete shock to the victim that they were an illegal money lender. They had borrowed from them through a legal doorstep company in the past. LIAISE referred this victim to Citizen Advice for support with utility debts.

Victim three is receiving disability benefits for a family member and child. They currently have a priority debt of rent arrears with a payment plan in place for this. Their non-priority debt is just over £20,000 and following support from LIAISE they have a payment plan in place to pay this off.

#### Operation Zester

The victim is very vulnerable living in social housing and receiving benefits due to ill health. The harassment they received caused significant distress and affected their mental health and well-being. LIAISE supported a referral to a Housing for a transfer to another area and a referral to Adult Social Care team. The victim has various non-priority debts of over £8,000 and a referral was made by LIAISE to Citizen Advice for support with these debts.

#### Operation Mamba

This victim was very worried about their rent arrears and possible enforcement action against their tenancy. With the support from LIAISE the victim was able to negotiate an agreement with their housing provider about repaying their rent arrears. They were also referred for debt advice help with their other debts.

Following LIAISE contact with the housing service, a housing officer referred another victim to the team. The victim had reported the potential lender to the Police and had fled their property due to fear. They were living in temporary housing and were looking for support to secure a new home in another area. This report is awaiting a crime reference number and timeline of events from the victim to see where and how the team can help.

#### Operation Vulgate

The victims in this case had previously been referred through to the team as victims of an illegal money lender however they have not engaged. Another referral has now been received from a complex-needs safeguarding social worker. They advised the victims will now meet with the team to find out more and discuss their options. As is commonly seen with victims of illegal lending, they are fearful of repercussions and are very vulnerable.

#### Operation Yellows

A victim contacted a local support agency and was referred on to IMLT. The victim said they have been borrowing money from individuals for years to support the family and their businesses. The last loan was £40k with a full repayment agreed of £80k. The lender now wants £250k and has petrol bombed outside the victim's family home. The victim is married with small children. Information was provided to victim about how IMLT can help, also to contact the Police if they feel in any danger. The victim is reluctant to engage due to fear but has IMLT contact details if they wish to progress with the investigation.

### Operation Zokor

The potential loan shark has been in touch with a victim asking for another 'final' payment. The victim has told the loan shark that they have paid what they owe. The victim has evidence that they have paid the loan shark in full via a text message. LIAISE suggested to the victim to ask the loan shark for a copy of the paperwork which shows the outstanding payment and see if anything is provided. The victim will call the Police should the loan shark or any associates turn up at the victim home.

### Operation Lambada

LIAISE supported two victims with a potential illegal lender that was threatening them to make them bankrupt. They were advised to approach the local policing team to report potential financial abuse situation that caused them to turn to the suspect for money. LIAISE also provided advice in relation to responding to the bankruptcy.

## **6. Victim Profile**

- The gender split of borrowers was 60% female and 40% male.
- 65% of victims supported were parents, half of these were lone parents.
- 59% of victims indicated they had long term health conditions.
- 28% reported mental health issues.
- 8% of borrowers said they acted as a carer for someone over 18.
- 32% of victims said that they had considered suicide during their lifetime including 14% who had attempted suicide.
- 98% of borrowers said that they were in a state of worry, stress, depression or severe anxiety because of their involvement with a loan shark
- 69% of respondents paid rent for their home, either to a social landlord or private property owner.
- 26% of respondents said that they had visited a debt advisor.
- 36% had heard of the term "Credit Union" but only 5% were members of one.
- 55% of victims were receiving benefits of some kind and 31% were in receipt of Universal Credit.



## **7. Victim Statistics**

- 7.1 The majority (56%) of clients were introduced to the lender via family or friends. Loan sharks will be friendly all the time somebody is repaying their loan so will quite often be recommended as a credit option by new borrowers.
- 7.2 At the point of taking the loan, 48% of respondents thought they were borrowing from a friend.
- 7.3 20% of borrowers met the loan shark in their community – whether that be cultural or geographic. In some cases the lender was a work colleague or went where workers went. For example, one lender left flyers on taxi cab ranks.
- 7.4 Reason for borrowing:

Addiction – Drugs/Alcohol	4	Fuel Costs	1
Addiction – Gambling	9	Furniture/Electrical Equipt	6
Bailiff Debt	1	Health/Funeral	6
Business Costs	13	Helping Family Members	11
Caring for Children	1	Household Bills	29
Christmas Expenses	4	Job Loss	5
Deposit for Home	1	Vehicle Purchase/Repair	5
Education	1	Wedding Expenditure	1
Food	3		

- 7.5 24% of clients borrowed £500 or less
- Median amount borrowed - £500
  - Median amount repaid - £4,500
  - The lowest amount borrowed was £90 for household food/bills
  - The highest amount borrowed was £60,000 for medical expenses
- 7.6 Just as there is no typical loan shark, there is no typical loan either, apart from it is very rare that a borrower will repay less than double the amount borrowed.
- 7.7 One client borrowed £500 for household bills and has been making payments for three years, they have repaid £18,000 so far and still owe £500.
- 7.8 Another borrowed £300 and had repaid £100,000 in total.
- 7.9 48% of people supported were employed

## **8. Training – Partners**

- 8.1 In 2022 the team trained over 20,000 frontline staff – some online and some face to face.

- 8.2 A new training package for debt advisors is about to be rolled out which is more workshop style to try and engage the sector in uncovering and providing intelligence to IMLT.

## **9. National Partnerships**

- 9.1 LIAISE are working with a number of organisations to develop an algorithmic approach to spotting illegal money lending through open banking. As the number of agencies who use open banking (viewing a customer's bank statements) to assess affordability increases, and around 50% of loan sharks use bank transfer to issue and collect on loans, there is an opportunity to generate intelligence.
- 9.2 One of these organisations, Incuto, does back office work for credit unions. They are working to develop the algorithm which will then prompt loans officers to ask clients about illegal money lending.
- 9.3 IMLT are working with Step Change and Payplan to increase intelligence flow. Training, system change, and regular conversations are starting to have an impact demonstrated by an increase in referrals.
- 9.4 IMLT is working with Nest Egg to look at increasing access to affordable, legal credit through information and advice.
- 9.5 A partnership with Responsible Finance and CDFIs is helping LIAISE help people access credit when they have been/would be turned down for credit from Credit Union.
- 9.6 Work is ongoing with legitimate alternative credit providers. This includes training for companies including Moses Club and Amigo Loans, and work with the trade association and individual bailiff firms to help staff spot potential victims.

## **10 Localised Partnerships**

- 10.1 Work was completed in partnership with Sandwell Council to deliver our campaign and resources on their social media channels. Training was delivered to staff in Community Safety/Consumer Protection teams and different subgroups across the council.
- 10.2 IMLT have ongoing discussions with Greater Manchester Combined Authority to include a question on illegal lenders on their next questionnaire. They had 45% replies on a previous questionnaire that people had borrowed from friends and family. We would like to ask the question to enable us to analyse and explore if they could be a potential illegal lender.
- 10.3 Work completed with West Midlands PCC and Birmingham Credit union City Save to raise awareness of IMLT and CU in Police priority areas. Also work continues with Birmingham City Council Housing Contractors across England to raise awareness.

- 10.4 Work is ongoing with Trading Standards Rochdale to deliver face to face training sessions across multiple departments of Rochdale Council and local Police Teams. Additional project to raise aware with Taxi drivers/Licensing through flyers and social media.
- 10.5 Funding has been secured from Merseyside Police for awareness raising in partnership with the Police Pathfinders starting in Beechwood. Looking at a Santa Dash with Stop Loan Sharks lanyards and medals for participants.
- 10.6 A project with the Centre for the Partially Sighted Wirral has included a display of artwork from the Merseyside Police Pathfinders sessions in their reception area. They also have leaflets on display and are thinking about a stop loan sharks message in 'braille' via the POCA process.
- 10.7 Sid the Shark attended an event for Trans Pennine trains staff, to raise awareness.
- 10.8 LIAISE delivered a presentation to one of the South Gloucestershire Stronger Community forums. There are 21 of these forums in total covering the whole of South Gloucestershire and so far 9 have had presentations.
- 10.9 In response to an incident in Bristol, LIAISE are working with Citizens Advice and the local foodbank to raise the profile of the IMLT through leaflets, posters and social media.

## **11 Credit Union Incentives**

- 11.1 Over 900 incentivised credit union accounts were opened during 2022.
- 11.2 IMLT are collating data around the incentives this year.
- The median amount saved after 3 months was £98.45
  - 71% had continued to grow their savings after the 3-month period
  - 18% had reduced their savings balance but still maintained some savings at 6 months
- 11.3 IMLT has data for 92 members who went on to take out a loan The median amount borrowed was £548. Of these, 4 are in default, 1 has some arrears and the remainder are up to date. (92% of members who took a loan following the incentive are up to date).
- 11.4 The analysis will continue until late 2023 and further stats will be reported at a later date.

## **12. Other Credit Union Work**

- 12.1 Credit Unions identified problem gambling as a barrier that was stopping them issuing loans. IMLT ran a number of joint sessions with Gamcare to help credit unions formulate their thinking around risk in this area

- 12.2 IMLT used proceeds of crime funding to support the credit union sector use social media more effectively. The team engaged Zync Digital to put on a workshops and then one to one sessions tailored to the needs of individual Credit Unions.

### **13 Proceeds of Crime**

- 13.1 Examples of projects funded by proceeds of crime money since July 2022 include:

#### North East

Blowin' A Hooley - To continue to deliver their play "Cinderella's Dilemma" throughout the North East to young children and their families. Adapting the play to feature new trends spotted by IMLT in relation to loan sharks.

Digital Voices for Communities - Tik Tok video made by digital avatars who can then speak participants words in anonymity. Using the Fenham community to engage residents into the subject of IML.

Forage Community - Community shark poster competition – winning design to be printed on drinking vessels and used in their community café. Shark themed event at the venue.

Oasis Community Housing - Art project within a homeless charity. Art projects such as paper mâché shark, embroidery wall hanging, string art shark. Credit Union saving incentives to attend. Money management advice given.

Tees Valley Together - TikTok video to be made by young people living in high levels of deprivation and ASB.

Together for Children - Large mural in a deprived area. Created with the help of the local children and the Salvation Army.

Primrose Hill - The project has two elements: A play "Stay Away from Loan Sharks", the production of A Film/Video and a tapestry.

Pallion Action Group - Sessional stop loan sharks art groups with vulnerable families. Finished artwork to be showcased at an exhibition.

#### South East

Talk Back Buckinghamshire - 8 interactive workshops specific to people with a learning difficulty. Comic strip-style workbook based on the play performed in the workshops and an accompanying stop-motion animation video, created by Talkback members.

#### South West

CAB Mendip and Somerset - Fun inter-active awareness sessions to young people in conjunction with a local artist who produces mural and wall art.

Permission to hang art in town centre.

Seadream Devon - Engaging young children through interactive workshops and using marine biology to educate the children on real sharks and loan sharks.

Somer Valley FM - An 8-month radio campaign consisting of 30 second radio message, broadcast a minimum of 8 times per day, including at least 2 airings during the peak-listen Breakfast Show and 4 Interview features.

The Lescudjack Centre - 6 months arts activity programme through which young people and adults who are particularly vulnerable to loan sharks will access a series of activity workshops with community artists.

### Yorkshire & Humber

Bradford College - To deliver an additional workshop on the MyBnk Money Works Programme that is looking at budgeting, borrowing and debt. They will create TikTok videos which will be shared on college social media and the large screen in Bradford's centenary square.

Community First Credit Union Ltd - A contest between High Schools who will compete in a live team quiz challenge. Teams of 4 from each of the 9 schools will be invited to participate and the quiz will be watched by their peers, parents/guardians and teachers.

Foresight North East Lincolnshire - Bringing together members of the community with predominantly learning disabilities. Creating a film to promote the stop loan sharks message. Launch week where it will be played for the community each day – with other resources the participants make.

HK Media & Training - Create 8 x 30 second radio information adverts played 12 times a day on their radio station. Also planning to create 10 podcasts for transmission too.

HD5 Community Hub, Netherhall Learning Campus - Heroes and Villains themed fun day across the 4 schools. Teachers will be carrying out lessons around loan sharks as it approaches the day. Poster design competition. Delivery of IMLT's awareness session to the parents/guardians in attendance.

Spectrum People - Creation of a 10ft 3D shark with local families. Also, to handout 'wellbeing packs' to vulnerable people in the community.

### East Midlands

Ashfield District Council - To work with schools to run a poster competition. Winning design to then be wrapped onto bin wagons.

CYF Notts - Getting children to design a picture that goes onto the back of playing cards. These to then be distributed to vulnerable families.

HQ Can CIC - Using local young people to create short, sharp videos around the dangers of loan sharks.

### North West

People Empowered CIC - Workshops for families and young people. Creating graffiti art and a podcast. Also delivering 50 training sessions.

Blacon High School - Group of schools. Arts and drama sessions in PSHE. Artwork to take home to parents. Monologues. Spray art sessions for residents. Performances in assemblies and to the communities.

Bolton Uni - Graphic design students - looking at key times of the year to design awareness raising. Exhibit for 2 weeks in Bolton town. Designing an advertising campaign spanning both traditional media such as posters, banners, leaflets etc and digital media such as websites, social media and video material and app creation.

Arts Groupie - Shadow puppet workshops. Create puppets and show with kids - perform in February half term. 85,000 online audience.

Digital Arts Box - 4 digital art workshops during which the young people will learn how to use a combination physical and digital art techniques including, green screen, photography and graphic design to create their own 'stop loan sharks' inspired bank note.

Magic Money Trees project - Stop loan sharks themed art work as well as the bank notes to hang on trees.

Everton in the Community - Premier league primary stars. In schools design a poster during debt awareness week. Announced a match. Art therapy sessions around loan sharks across 6 different groups. LS Ambassador.

Lancashire Trading Standards - Information sessions for art students at schools/colleges in Burnley in relation to the dangers of loan sharks. Students will then be tasked to develop a multimedia campaign promoting the dangers of becoming involved with loan sharks and the support that is available to people who have done so. Winning design to be display on digital billboards.

Accrington Stanley Latics - Workshops in high schools with a design a poster campaign. Also as part of kicks project. Online awareness. Home game - big screen and flyers round the ground.

Yellow Jigsaw Wigan - Pop up news room for young people – allowing them to investigate and film own journalist piece (on Loan Shark topic). 3 video reports (used on Youtube and as clips on all social media), 2 Instagram reels and 2 TikTok videos, as well as aiming to get newspaper coverage of their work. The reports will consist of interviews, a press conference, investigations and presenting.

Hope Prospect Wirral - Awareness sessions with the men who live there. Film evening – showing IMLT videos. Mug design and winning one created, with large copy of design displayed in communal lounge.

### EETSA

CAB Dacorum - Yarn Bombers will crochet and knit with machines and needles creating wonderful toppers for local post boxes across the Dacorum area which has a population of 155,500. Two-week campaign which will involve a treasure hunt for the community.

Dial GT Yarmouth - Shark themed t-shirt design competition involving three schools. Each child will receive a 'Shark Pack' which will contain a plain white tee shirt and necessary design materials to help create their design. 3 winners from each school.

### London

A4R – Advice 4 Renters have an old Metroline bus which they are turning into a Mobile Money and Energy Advice Centre. They want to vinyl wrap the bus with the Stop Loan Sharks message which is then taken around to events.

Disability Action Haringay - Money Skills and Circus Skills combined sessions. To use teaching of circus skills as an opportunity to engage and discuss money skills.

Somali Council - Using social influencers to get the message out about the dangers of loan sharks. Getting young people to create videos in English and Somali.

Student Money London - Kings College students peer support around money and dangers of IML. A week-long campaign, combining interactive in-person stalls with engaging games, informative workshops delivered by Money Mentors and guest speakers, as well as informative social media/blog content to make more students stay alert to loan sharks.

### CENTSA

Nuneaton and Bedworth Borough Council - Social media push to raise awareness of loan sharks and to advise people where they can access support. Linked to a credit union incentive.

Nourish Social - Creating a music driven social media campaign.

Community Pantry (Feed the Hungry) - Family fun days – loan shark focus.

Smartlyte Ltd - Designing a large-scale poster to display on Fire Station initially but can be moved. This will be created with the community via fun days. Centred around Amsty (a computer) on a mission to scare away Mr Loan

Shark. Opportunities to create stop animations

TLC Wolverhampton - Character workshop. Sid the Shark battle against the heroes they develop. Comic book. Art and craft workshops.

- 13.2 POCA monies have also been used to pay for Facebook ads targeting specific areas of the country following arrests/intelligence.

## **14 Funding**

- 14.1 The IMLT project is currently funded by the Treasury.
- 14.2 The governance of the project consists of representatives from the Financial Conduct Authority (FCA), Treasury and the hosting authorities involved (England, Northern Ireland, Scotland and Wales).
- 14.3 The current budget is £4,546,511.

## **15 Implications for Resources**

- 15.1 The Illegal Money Lending Team is grant funded and therefore all costs for the service are recovered through this provision. Any income and proceeds of crime monies are ring fenced to the team and utilised for the ongoing work.

## **16 Implications for Policy Priorities**

- 16.1 Enforcement action taken against illegal money lenders improves the quality of life for those individuals caught within the grips of this pernicious criminality.
- 16.2 Illegal money lenders prey on the most vulnerable groups and enforcement action to remove them from communities and encourage more sustainable credit sources such as credit unions is important. Prosecution and removal of illegal money lenders from communities will reduce the fear of intimidation and violence.

## **17 Public Sector Equality Duty**

- 17.1 Illegal Money lenders prey on the most vulnerable members of society. They target people who may be financially excluded and, in many instances, people over whom they can exert power and control. Removing an illegal lender and introducing alternatives helps those individuals that have been trapped by the illegal lender into paying high interest or being forced into carrying out activities, under normal circumstances, they would not commit.

## **DIRECTOR OF REGULATION AND ENFORCEMENT**

Background Papers: Files held by the IMLT