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Summary

Fraud Helpdesk evaluation

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The researchers are responsible for the content of the report. Making a contribution (as an employee of an organisation or as a member of the supervisory committee) does not automatically mean that the contributor agrees with all the contents of the report. This also applies to the Ministry of Justice and Security and its Minister.

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Summary

Background

The Netherlands has several information points and hotlines where citizens and businesses can obtain information on (new) forms of horizontal fraud involving harm to citizens and businesses, and where fraud and scams can be reported.¹ One such fraud hotline - the one at the centre of this study, which focuses on all forms of fraud - is the Fraud Helpdesk. The Fraud Helpdesk was set up by the SafeCin Foundation after the Ministry of Justice and Security (hereafter: JenV) made funding available for this purpose in late 2010. The Ministry of JenV is currently the sole funder. This evaluation aims to assist in decision-making regarding further funding, the amount of the funding to be awarded, the goals of the funding and conditions to be set thereby.

Research question and substudies

The following research questions were central to the study:

1. To what extent can the goals pursued by the Fraud Helpdesk be achieved in theory under the current funding conditions and the organisation plan of the Fraud Helpdesk?
2. To what extent does the practical implementation of the Fraud Helpdesk's organisation plan suffice in making these goals attainable?
3. What contribution has the Fraud Helpdesk made to preventing and combating horizontal fraud?
4. What role does the Fraud Helpdesk occupy in the field of Dutch fraud prevention and control?
5. How could the performance of the Fraud Helpdesk in achieving its targets in the future be (further) improved? Are any structural or process changes needed to improve the Fraud Helpdesk's future contribution to fraud prevention and control in the Netherlands?

The study was conducted on the basis of four substudies.

¹ In the 1997 memorandum *Zicht op fraude* (Focus on Fraud), the Public Prosecutor's Office made explicit the distinction between vertical and horizontal fraud. In vertical fraud, the government is the aggrieved party. In horizontal fraud, a citizen or company is harmed.

I. Plan evaluation

The plan evaluation focused on why a policy intervention (establishing a helpdesk) *might* work. To do this, we identified the policy theory and created a goal tree based on this theory. The reconstructed policy theory was presented to experts in the field of fraud (control) and an assessment was made as to whether any substantiation could be found in the scientific literature for the hypothesised operating mechanisms.

II. Process evaluation

The potential effectiveness of the Fraud Helpdesk is not only determined by the quality of the policy theory, but also by the implementation and organisation of the Fraud Helpdesk. This was the focus of the process evaluation, which focused on work performed by the Fraud Helpdesk in practice. In addition, sticking points in implementation have been identified. Because implementation touches upon several aspects, the process evaluation focused on four components: implementation, awareness of the Fraud Helpdesk, appreciation of the Fraud Helpdesk, and sticking points. The research activities for the process evaluation were carried out in the first half of 2023.

III. The spectrum of fraud hotlines

Over the years, a multitude of fraud hotlines have emerged. This substudy identified existing fraud hotlines for horizontal fraud. Horizontal fraud refers to fraud targeting citizens, financial institutions or companies. We looked at which hotlines have overlap in services and where the Fraud Helpdesk differs from the services of other hotlines.

IV. Synthesis

The research was concluded with a synthesis. This summarises all the findings from the three substudies and translates them into conclusions about the Fraud Helpdesk in general and answers the research questions.

Method

Kick-off meeting

The research started with a kick-off meeting with the director of the Fraud Helpdesk. During this meeting we explained the research work we planned to carry out that would require cooperation from the Fraud Helpdesk. Among other things, arrangements were made for the distribution of a questionnaire to the persons making reports and for the provision of documents.

Desk research

At the start of the study, information on the formation of the Fraud Helpdesk was collected and examined. This primarily involved parliamentary documents, such as parliamentary papers and (progress) letters from the minister to parliament. Based on the study of these documents, the policy theory was identified and a goal tree drawn up. In addition, we sought relevant literature and documents that contained information on the hypotheses on which the policy theory is based. Finally, the Fraud Helpdesk's annual reports were also studied.

Interviews

To get a picture of, among other things, the (development of) services provided by the Fraud Helpdesk and the sticking points and challenges, five Fraud Helpdesk employees and two members of the Supervisory Board were interviewed. An in-depth interview was also held with

the director of the Fraud Helpdesk. To gauge appreciation of service delivery by chain partners, we interviewed seventeen people at fourteen different chain partners. Finally, two experts on fraud were interviewed.

Study of registrations

Information from the annual reports was used to identify the number of referrals and reports made by telephone and digitally and the costs of reported damage. Information was also provided by the Fraud Helpdesk regarding the number of website visitors.

Website research

The findability of the Fraud Helpdesk's website was analysed by conducting website research. For this purpose, a list of obvious search terms was drawn up and then supplemented with synonyms. For each search term, we looked at which position in Google the Fraud Helpdesk website came up. In addition, we looked at the extent to which the Fraud Helpdesk's website is easily findable via websites of chain partners, by searching for it on those websites.

Questionnaire and telephone interviews with persons making reports

To research reporters' appreciation of the Fraud Helpdesk, we conducted a digital questionnaire among almost two thousand reporters. The result was a total of 412 (partially and fully) completed questionnaires. After completing the questionnaire survey, a number of respondents were contacted in order to ask some additional questions. We spoke to ten respondents who indicated their willingness to provide additional clarification.

Spectrum of fraud hotlines

To map the spectrum of fraud hotlines for horizontal fraud, a previous 2015 compilation of fraud hotlines made by Homburg and Van den Tillaart was used.² The compilation from that study has been updated and supplemented with new hotlines. The list of search terms compiled as part of the website research was used to identify new hotlines.

Expert meeting

The research concluded with an expert meeting in which we presented our preliminary findings to chain partners and discussed how to (further) improve the future target achievement of the Fraud Helpdesk.

Feedback

For a fact check, the latest version of the draft final report (without the analysis) was submitted to the Fraud Helpdesk for feedback. Following this, a brief meeting was held with the interim director of the Fraud Helpdesk. In addition, the Fraud Helpdesk placed comments in the draft final report document. Factual inaccuracies have been corrected and some suggestions for additions have been included in the report.

Research results

Reconstruction of policy

The Fraud Helpdesk was set up more than a decade ago. The reason for setting up a helpdesk was that there was a lack of understanding of the nature and extent of fraud. A better understanding of the forms of horizontal fraud and modus operandi was needed. In addition, it was

² Homburg, G. and Van den Tillaart, J. (2015) *Fraudemeldpunten: synergie en samenwerking*. Amsterdam: Regioplan.

deemed necessary to create more fraud awareness among citizens and small entrepreneurs and to provide support to victims. Over the years, (horizontal) fraud has moved higher and higher up the political and policy agendas and the ministry sees prevention as the most effective use for combating fraud.

The first goal of establishing a fraud helpdesk was to provide the best possible support to victims and the second was to make citizens and businesses more resilient against attempted scams and frauds. To achieve these goals, the helpdesk - as stipulated in the 2010 funding conditions - had to provide three (basic) services: (1) recording numbers and types of reports, (2) providing general information on existing forms of fraud, and (3) referring victims to appropriate organisations. The way in which the Fraud Helpdesk provides these services in practice more than ten years after its establishment seems to be in line with the original idea as laid down in the funding conditions drawn up at the time of its establishment.

Based on scientific literature, reservations can be made regarding the hypothesis that providing general information through, for example, campaigns is effective. However, the hypothesis that a central hotline should provide support to victims of fraud does have some backing in the literature. The policy reconstruction further shows that five preconditions were formulated by the minister in a parliamentary letter at the time.³ The study did not reveal the exact rationale behind these preconditions, nor were most of them recognised by interviewees or seen as relevant.

One of the preconditions is that an infrastructure had to be in place that enabled fraud reports to be passed on to the Police and the Public Prosecution Office. The Fraud Helpdesk is not allowed (to date) to process personal data of a criminal nature for the benefit of third parties because it does not have a licence to do so from the Authority for de Protection of Personal data (AP), which means it is currently not possible to comply with this precondition. Some chain partners indicated that if such data were allowed to be shared, fraud could be better controlled. The question is whether this is a task that is in keeping with the purposes for which the Fraud Helpdesk was set up.

The practical organisation and financing of the Fraud Helpdesk

For the last few years, the Fraud Helpdesk has been receiving subsidies from the Ministry of JenV and EZK (The Ministry of Economic Affairs and Climate). The ministry of EZK phased out its funding in 2021 and 2022, so from 2023 the Fraud Helpdesk only receives funding from the ministry of JenV. The Ministry of JenV does not consider it desirable to be the sole funder. The Fraud Helpdesk stresses the need for structural funding in a multi-year plan, with a view to development ambitions and being a preferred employer. For new projects, the Fraud Helpdesk is now forced to tap new sources of funding. This is what the Fraud Helpdesk has been working on in recent years.

Although the Fraud Helpdesk is a private foundation, it relies mainly on public funds. Reducing dependence on the Ministry of JenV as the sole funder, by tapping other funding sources, would make the organisation less vulnerable. At the same time, public funding will be necessary because these are public services that market players are unlikely to provide.

That the organisation of the Fraud Helpdesk is vulnerable was also pointed out during several interviews with chain partners. Chain partners report that the vulnerability is caused by the

³ *Kamerstukken II, 2009/10, 29 911, no. 41, p.2.*

limited budget available to the Fraud Helpdesk. Chain partners do see that the Fraud Helpdesk does a lot of work with a small group of employees. Having sufficient capacity in the future is important in preventing and controlling fraud, according to several chain partners.

The evaluation shows that the funding conditions as drafted in 2010 are no longer applicable. However, most of the conditions deemed relevant at the time are still met.

The contribution made by the Fraud Helpdesk to preventing and controlling horizontal fraud

The question of what contribution the Fraud Helpdesk has made to achieving the objectives cannot be answered unequivocally and with precision, and assessing the effectiveness of the services is complicated in practice. Citizen resilience and victim support are virtually impossible to measure; both are influenced by a wide range of factors. What is more, there is no baseline measurement, so measures cannot be assessed for effectiveness. For these reasons, it is not possible to test the policy theory. We therefore looked at how the Fraud Helpdesk goes about achieving its goals and how the service is assessed by the persons making reports and chain partners.

Although the question of what contribution the Fraud Helpdesk has made to achieving the objectives cannot be answered unequivocally and with precision, the Fraud Helpdesk does seem to have some added value. Findings from the questionnaire survey give an indication of the extent to which victims of fraud feel supported. The results of the questionnaire survey partially support the hypothesis that victims are supported, as half of respondents are satisfied with the way they were helped by the Fraud Helpdesk and 61% of respondents feel they were referred to the right organisation. Yet the questionnaire survey also shows that far from all respondents are satisfied with the way they were helped by the Fraud Helpdesk. This seems to be mainly due to the fact that some of the reporters had a different expectation from the Fraud Helpdesk, namely that action would be taken against the fraudster.

There is no direct source of information in this research that provides insight into the Fraud Helpdesk's contribution to making citizens and businesses more resilient against (attempted) scams. Judging from interviews with chain partners, it is plausible that the Fraud Helpdesk does contribute to making citizens and businesses more resilient, especially when it comes to providing information. Chain partners see added value in the Fraud Helpdesk particularly in the area of prevention. Interviews with the Fraud Helpdesk and desk research show that the Fraud Helpdesk sets up annual campaigns (in cooperation with chain partners), posts warning notices on current forms of fraud and issues a monthly monitor with up-to-date information on trends and developments. However, based on the literature, some critical comments can be made as to the effectiveness of providing general information through campaigns, for example.

The position of the Fraud Helpdesk within the spectrum of horizontal fraud hotlines

The policy reconstruction shows that the idea at the time was to establish a single helpdesk where citizens and businesses could go for advice and answers to questions relating to financial and economic crime.⁴ Today, there are numerous hotlines and help lines for horizontal fraud, of which the Fraud Helpdesk is but one. A total of 65 hotlines and help lines were identified in this study.

⁴ *Kamerstukken II*, 2008/09, 29 911, no. 32, p.2.

The Fraud Helpdesk uses reports on (potential) fraud to contribute to the front end of the anti-fraud chain (prevention and support for victims) rather than the back end (tackling and investigating fraud cases). In this, the Fraud Helpdesk differs from a large number of hotlines that are part of larger companies, institutions or public hotlines that collect reports as grounds for investigation and detection or to take action against fraudsters. In addition, most of the hotlines linked to a larger company or institution focus on specific types of fraud that do not always directly affect citizens or small entrepreneurs. Our research into the spectrum of fraud hotlines shows that while the Fraud Helpdesk does not provide services that are unique, its combination of services and broad orientation to all forms of fraud are unique within the spectrum of fraud hotlines.

(Further) improving the Fraud Helpdesk's performance in achieving its goals

From 'hotline' to 'helpdesk'

Discussions with chain partners indicated that the name 'Fraud Helpdesk' implies that victims are helped (substantively). This is true to only a limited extent, which makes the Fraud Helpdesk more like a 'hotline' than a 'helpdesk'. The questionnaire survey showed that 22% of respondents were (very) dissatisfied with the way they were helped by the Fraud Helpdesk. One of the main reasons for this seems to be that the reporters had a different expectation of the service provided by the Fraud Helpdesk; they expected action to be taken by the Fraud Helpdesk. Opportunities that emerged during the expert meeting to provide more support to victims include offering help in reporting, filling in forms or recovering damages. Likewise, warm referrals would have added value from the victim's perspective. Then victims would not have to retell their experiences multiple times. Moreover, when cold referrals are made, many reporters drop out. Hence, some of the information is currently being lost. But warm referrals come up against legal objections because of the personal data that must then be transmitted.

Fraud Helpdesk has valuable data, but could do more with it

According to the majority of chain partners, the Fraud Helpdesk has relevant and valuable information. The trends and developments identified by the Fraud Helpdesk are also generally recognised by chain partners. However, the Fraud Helpdesk's information does not give a complete picture when it comes to damage amounts and numbers of victims, among other things. The expert meeting indicated that it would be valuable to bring together information from different chain partners to create a more complete picture of the current state of fraud. This need not directly involve sharing personal data of a criminal nature, as it may involve data at an abstracted level that cannot be traced back to individuals. There could possibly be a role for the Fraud Helpdesk here.

Strengthening the policy relationship between the ministry and the Fraud Helpdesk

For years, prevention has been one of the main pillars of the Ministry of JenV's fraud policy. As part of prevention, the ministry subsidises the Fraud Helpdesk. From interviews with the Fraud Helpdesk, among others, it emerges that there has been little substantive coordination between the ministry and the Fraud Helpdesk in recent years. Also, steering from the ministry through setting funding conditions seems to be limited in recent years. There are no output/outcome agreements for the services provided. The performance of the Fraud Helpdesk in achieving its goals can be further improved by focusing on structural substantive coordination with the ministry regarding trends and developments, among other things, so as to ensure that this information contributes to future policy. The ministry has indicated that it is appropriate to engage in more demand-driven cooperation in the future on the basis of a multi-year policy vision, but first wants to commission research into the contribution of the Fraud

Helpdesk's organisation to achieving its objectives.⁵ The Fraud Helpdesk and the ministry seem to agree that the policy relationship could be improved.⁶

Continuity and stability in the financing of the Fraud Helpdesk

The Fraud Helpdesk reports that the annual subsidy award creates a lot of financial uncertainty about the continuity of the organisation and limits the Fraud Helpdesk's development ambitions. While it is understandable that the funding system has an annual cycle, embedding it in a multi-year relationship would give the Fraud Helpdesk more stability and make it less vulnerable.

Personal data of a criminal nature

Permission to process personal data of a criminal nature for the benefit of third parties requires a licence from the AP. The Fraud Helpdesk's application for a licence to process this personal data for the purpose of its helpdesk function was rejected by the AP. The AP considers - in short - that it is not necessary for the Fraud Helpdesk to process personal data of a criminal nature for the purpose of advising persons making reports.

The Fraud Helpdesk feels that not being allowed to process personal data of a criminal nature is an impediment to being able to provide the best possible service. Handling a report requires getting a good picture of the situation. This, according to the Fraud Helpdesk, requires access to the underlying documents of the report (which may contain personal data of a criminal nature).⁷ The questionnaire survey showed that more than half of respondents (56%) were satisfied with the Fraud Helpdesk's advice. In this sense, despite the fact that the Fraud Helpdesk may not currently receive data on the (potential) fraudster, there does not seem to be any major dissatisfaction with the Fraud Helpdesk's advice.

The opinions of chain partners regarding the added value of sharing personal data between organisations are divided. A number of chain partners agree with the Fraud Helpdesk that by sharing data on fraudsters, fraud can be better combated. Some chain partners who participated in the expert meeting did not immediately see this need and raised the question to what extent the Fraud Helpdesk's fight against fraud is in line with the objectives for which the Fraud Helpdesk was set up.

Personal data of a criminal nature are sensitive data. Sharing this data with other parties may significantly infringe on the privacy of data subjects. It follows from the policy reconstruction that the Fraud Helpdesk was set up to contribute to the front end of the anti-fraud chain in particular. By sharing personal data on fraudsters with other organisations, the Fraud Helpdesk will become more active at the back end (tackling fraud). Given the objectives that emerged from the policy reconstruction, such back-end involvement does not therefore seem logical. Clearly, if there is a political and social desire for the Fraud Helpdesk to process personal data of a criminal nature for the benefit of third parties, and the AP does not grant a licence, it is necessary to create an explicit legal basis for this.

Directions for development

The ministry wants to wait for this evaluation before making further decisions for reassessing both the policy and funding relationship with the Fraud Helpdesk. Regarding the future of the Fraud Helpdesk, several development directions are conceivable. Based on this research, it is

⁵ Subsidy award, 26 January 2023.

⁶ Subsidy award, 26 January 2023.

⁷ Fraud Helpdesk, supplementary appeal against the decision with reference z2021-14398, 22 May 2022, p. 9.

not possible to make unequivocal statements about the contribution the Fraud Helpdesk will make in supporting victims and making citizens and businesses more resilient against (at-tempted) fraud, should the Fraud Helpdesk continue in its current format. However, in light of the findings of this research, the Fraud Helpdesk's current service does seem to have some added value in terms of prevention and supporting victims.

Another possibility is that the Fraud Helpdesk ceases to exist in the future. If this happens, in time, a gap in fraud prevention may arise. As the survey of the spectrum of fraud hotlines shows, the Fraud Helpdesk is the only organisation that focuses on all forms of fraud. The demise of the Fraud Helpdesk will see the disappearance of an organisation that has an over-arching view and identifies trends and developments across all forms of fraud. Interviews with chain partners suggest that chain partners consider this information useful, also for prevention purposes. Based on this research, it is not possible to make any judgments as to whether other organisations would or are able to take over (part of) the Fraud Helpdesk's services when the Fraud Helpdesk ceases to exist.

A final development direction is for the Fraud Helpdesk to continue developing its current services. This could include (practical) support for victims and bringing together information from chain partners on trends and developments. Continuing to develop the current service can (further) increase the added value of the Fraud Helpdesk. However, continuing to develop services is expected to require more time and capacity and therefore more resources.

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