Rhwydwaith
CYMUNEDAU MWY DIOGEL CYMRU
WALES SAFER COMMUNITIES
Network

# Wales Safer Communities Network response to:
# Home Office - Preventing the use of SIM farms for fraud

Closed 14 June 2023
Response submitted via the online survey.

## Questions

### A. Definition and uses of SIM farms

**Q1. Do you agree with the government definition of a SIM farm, as a device that contains more than four SIM cards?**
Yes, in the current situation where there are four mobile operators in the UK, however this should be reduced if two merge or one is no longer delivering services.

**Q2. What other technology could be brought under this ban and how should this be described?**
Technology that allows the combination, connectivity or a direct/indirect route between more than two or more SIM farms and/or does the same into an online telephone system. This is important with more telephone numbers and communications being carried out through Apps such as Microsoft Teams, WhatsApp, or through VoIP or other Internet enabled programmes and platforms.
There may also be a need for legislation that deals with SIM Farms and AI technologies from being linked together, the advances in both technologies could begin to prevent real communication between families, friends and wider communities with the potential to learn and imitate behaviour.

**Q3. What crimes are SIM farms used to facilitate?**
SIM farms seem to be used for anything that an individual phone or SIM may be used for, just on a wider scale. For example: money theft; spreading of inaccurate information for financial, political or because they can; romance fraud when combined with other tools; identity theft; location finding which may be utilised to identify vulnerable/at risk adults or children or as part of harassment or stalking; for harassment; spreading of harmful messages (including misogyny) which could lead to anti-social behaviour, hate crimes or worse.

**Q4. Do you have any data or examples to demonstrate the scale of their illegitimate uses?**
Not at this time.

**Q5. Are you aware of legitimate uses of SIM farms that are not mentioned in this document?**
No

**Q6. Do you have any data or examples to demonstrate the scale of their legitimate use?**
Not applicable, see answer to 5

**Q7. [For businesses] Does your business involve SIM farms?**
a) Yes
**b) No**

**B. Other technologies used for fraud in the UK**
**Q8. Do you know of any other technologies, services or devices, online or offline, that can be used to do similar things as SIM farms? How easy would it be to switch to these?**
We are not aware of any specifically at the moment, but given the speed of technological advances there are likely to be some already either being used or close to being used. Organised Crime Groups are adapt at changing processes, activities, tools and therefore, we do not see any reason why switching between technologies, services, devices would be difficult for them.

**Q9. Are you aware of any legitimate uses of the items specified in Q8?**
a) Yes
b) **No**

**Q10. [For businesses] Does your business involve any of the items specified in Q8?**
a) Yes
**b) No**

**Q11. Do you know any other technologies, services or devices, online and/or offline, that can be used to send scam texts and/or make scam calls?**
a) Yes
**b) No**

**Q12. Are you aware of any legitimate uses of the items specified in Q11?**
a) Yes
b) **No**

**Q13. [For businesses] Does your business involve any of the items specified in Q11?**
a) Yes
**b) No**

**C. Proposal to ban the manufacture, import, sales, hire, possession and /or use of SIM farms in the UK**

**Q14. To what extent do you agree with the proposal to ban the manufacture, import, sale, hire, possession and/or use of SIM farms in the UK?**
**a) Yes – fully agree**
b) Yes – agree in part/ not all aspects of ban
c) No – disagree
d) Don’t know

**Q15. Should this be a strict liability offence (i.e. the offender is held accountable for the manufacture, import, sale, hire, possession and/or use of SIM farms regardless of whether they behaved with the intention to commit a crime or with negligence)?**
Yes, even if the devices were sold initially in good faith there would be no guarantee they would not be used for criminal and/or fraudulent behaviour now or in the future.

**Q16. Should the punishment for this offence be an unlimited fine or what other punishment would be proportionate?**
We are not convinced that a fine no matter how large will have a negative impact on the activities of organised crime groups or even organised criminals themselves. Context may be needed so for multiple offences may require more severe punishment such as prison time.

**Q17. How would banning SIM farms impact their legitimate uses (if any)?**
Not aware of any impact as not aware of any legitimate uses.

**Q18. How would banning SIM farms impact their illegitimate or criminal uses?**
It may make them more difficult to access but would also mean there would be consequences if caught with a SIM farm where currently there doesn't seem to be any deterrent.

**Q19. Are you aware of any groups of businesses, organisations and/ or individuals that will be particularly affected by these proposals?**
a) Yes
b) **No**
c) Don't know

**Q20. Are there any other means to prevent criminals abusing SIM farms that could also achieve the goal of protecting the public from mass text scams?**
a) Yes
b) **No**

**Q21. What would be the impact of this proposal to ban the manufacture, import, sale, hire, possession and/or use of SIM farms in the UK on your business or organisation if it came into force?**
None

**Q22. Should a short, and strictly limited period of time, transition period be set to allow businesses, organisations and individuals to remove SIM farms?**
a) Yes
**b) No**

**D. Proposals to ban the manufacture, import, sale, hire, possession and / or use of (other) technologies used for fraud in the UK**

**Q23. Are you aware of any impact our proposals to ban the manufacture, import, sale, hire, possession and/or use of (other) technologies used for fraud in the UK may have, that we have not captured in this document?**
a) Yes
**b) No**

**Q24. Are you aware of any groups of businesses, organisations and/ or individuals that will be particularly affected by the proposal to ban other technologies?**
a) Yes
**b) No**

**Q25. What would be the impact of the proposal to ban other technologies used for fraud in the UK on your business or organisation if it came into force?**
No impact

**Q26. Do you have any comments or further information to add to the published economic note to further inform our proposals?**
a) Yes
b) **No**

**E. Ability to add further items to the list of banned technologies**

**Q27. Should the Secretary of State be able to add items to the list of banned technologies in the future?**
a) **Yes**
b) No

**Q28. Are conditions of evidence of use, stakeholder consultation and affirmative procedure appropriate for adding items to the list of banned technologies?**
Yes, but we think that there should be the added need to engage with the devolved administrations whether a devolved or reserved matter, as there may be wider implications.

**Q29. We propose that the Secretary of State be able to add items to the list of banned technologies in the future. Are you aware of any impact this proposal may have, that we have not captured in this document?**
a) **Yes**
b) No

**Q30. Are you aware of any groups of businesses, organisations and/ or individuals that will be particularly affected by this proposal?**
a) Yes
b) **No**

**F. Call for Evidence**

**Q31. Do you have any data or evidence to demonstrate the scale of legitimate use of SIM farms and other technologies used to communicate at scale?**
No

**Q32. Do you have any data or evidence to demonstrate the scale of the illegitimate use of SIM farms and similar technologies?**
No

**Q33. How would banning SIM farms impact their legitimate and illegitimate use?**
Please see answers to previous questions especially questions 3, 4, 5 and 8

**Q34. Are you aware of any impact the proposals may have that we have not captured in the economic impact note, published alongside this document?**
None at this time.

**Equality Impacts**

**Q35. Do you have any comments about the proposals in this consultation document in relation to impacts on people on the basis of any of the following protected characteristics under the Equality Act 2010: age; disability; pregnancy and maternity; race; religion or belief; sex; sexual orientation and gender reassignment; marriage or civil partnership? How might such impacts be mitigated? (Max. 500 words)**
There should be a positive impact for those with protected characteristics who are, or may be, targeted directly or by chance by organised crime utilising SIM farms to defraud, harass or steal other items or information from them (such as identity theft). Reducing the reach of organised crime and other individuals could assist in developing community cohesion, by reducing anti-social behaviour targeted at individuals or specific communities and hate crime which focuses on those characteristics.

**About you**

**Full name:** Sarah Capstick
**Job title or capacity in which you are responding to this consultation exercise:**
Business and Network Development Manager of the Wales Safer Communities Network. The Network is made up of partners involved in delivering community safety across Wales including Police and Crime Commissioners, Police Services, Fire and Rescue Services, Councils, Probation and the Third Sector (including Registered Social Landlords)
**Date:** 14.06.2023
**Company name/organisation:** Wales Safer Communities Network
**Email address**: sarah.capstick@wlga.gov.uk or safercommunities@wlga.gov.uk
**Address**: Wales Safer Communities Network, Welsh Local Government Association, One Canal Parade, Dumballs Road, Cardiff
**Postcode**:CF10 5BF