# Module D — Impersonation and cross-sector scam prevention

Editorial implementation aid; suggested owners and metrics are not statutory role titles or mandated KPIs.

**Decisions**

• Approve an own-provider impersonation decision procedure.

• Test spoofed-channel prevention and sector communication routes.

• Capture fraudulent-advertisement and hosting-notice evidence.

**Risks**

• Impersonation eligibility and fault findings can become conflated.

• Missing police-report dates can hide the decision-clock trigger.

• Platform best-efforts advertising duties can be overstated as blanket reimbursement.

**Dates and triggers**

• Article 60(2): notify and report to police without undue delay after awareness.

• Article 60(3): decision within 15 business days after notification and provision of police report.

• General Council application: entry plus 21 months under Article 124.

**Accountable owners**

• Fraud operations head: impersonation case decisions.

• Communications security head: bank-channel safeguards.

• Legal and digital risk: hosting, telecom and advertising escalation.

**Measures**

• Share of impersonation decisions with complete eligibility and customer-account evidence.

• Share of Article 60 decisions within the triggered clock.

• Time from fraudulent-content identification to the applicable hosting notice.

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Primary Council source