



Canadian Association of Chiefs of Police
Association canadienne des chefs de police

Presentation to the Department of Finance Canada

National Anti-Fraud Strategy Consultation

Submission prepared by:
CACP Private Sector Liaison Committee

On behalf of:

Canadian Association of Chiefs of Police

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The Canadian Association of Chiefs of Police (CACP) welcomes the opportunity to provide input to the Government of Canada’s consultation on the development of a National Anti-Fraud Strategy.

The call by the CACP for such a strategy is at the center of [resolution 2024-01: Enhancing Canada’s National Capacity to Combat Fraud](#), adopted at the 119th Canadian Association of the Chiefs of Police Annual General Meeting in July 2024.

Fraud has become one of the fastest growing and most damaging forms of criminal activity affecting Canadians. Cyber-enabled fraud, facilitated by rapid advances in digital platforms, mobile technology, artificial intelligence, and interconnected financial and communications systems, now poses systemic risk to Canada’s economy, public trust, and individual well-being.

The CACP concurs with the government’s assessment that current Canadian arrangements—legislative, regulatory, operational, and enforcement—are not sufficiently configured to address the scale, speed, and complexity of modern fraud. In particular, the lack of integrated national coordination, limited investigatory capacity within police services to tackle large-scale frauds involving multiple jurisdictions, and fragmented information-sharing authorities materially constrain Canada’s ability to reduce fraud victimization.

In an ever-changing technology-driven world, which will soon include real-time rail payment, the fraud eco-system always appears to be one step ahead of regulations and the law. Considering the exponential changes that artificial intelligence (AI) will create, legislative flexibility is required to allow law enforcement and the private sector the ability to combat this malicious use of technology by allowing the efficient sharing of intelligence. Therefore, this might require changes to privacy laws that give greater weight to public safety.

Fraud has no borders and all efforts should be made to facilitate international cooperation and sharing of intelligence to combat the large-scale fraud operations that exist, to be impactful with the resources that will be deployed, and to facilitate asset recovery for fraud victims.

This submission responds to the consultation questions and outlines priority actions to strengthen Canada’s national capacity to combat fraud through enhanced law enforcement capability, modernized legislative authorities, and durable public-private collaboration.

1. Scope of a Multi-Sector Anti-Fraud Framework

Consultation Questions 1–4

The CACP supports the inclusion of the financial services (regulated by OSFI, Fintrac, Fintech/Crypto), telecommunications, and digital platform sectors as the initial scope of a multi-sector anti-fraud framework.

Fraud schemes increasingly operate end-to-end across these sectors, exploiting gaps and misaligned responsibilities to conduct social engineering, identity compromise, and illicit fund transfers. Addressing fraud effectively requires coordinated obligations across all sectors involved in the fraud lifecycle.

Other sectors, such as payment intermediaries, online marketplaces, and technology infrastructure providers, should be considered for phased inclusion as the Framework matures.

A lead authority, with shared oversight and working in collaboration with sector-specific regulators, should be designated or established to:

- provide overarching coordination and governance of the framework;
- identify emerging and systemic fraud risks across sectors;
- enable consistent interpretation of standards and obligations; and
- serve as a focal point for engagement with national law enforcement.

Sector-specific regulators (e.g., OSFI, FCAC, CRTC) should continue oversight within their mandates, operating under harmonized expectations to avoid duplication and regulatory overlap.

2. Information Sharing and Privacy Protection

Consultation Questions 5–11 and 21–29

Effective prevention, detection, and disruption of fraud depend on timely, focused information sharing between regulators, regulated entities, and law enforcement.

The CACP supports all efforts and legislative changes that will facilitate intelligence sharing in a responsible fashion, permitting information sharing where necessary to prevent harm, disrupt known fraud actors, or support investigations.

Bidirectional information flows are essential. Private-sector entities and regulators must be able to provide intelligence to law enforcement, while law enforcement must also be empowered to share threat indicators, typologies, and warnings that enable proactive disruption.

3. Strengthening Fraud Prevention

Consultation Questions 12–17

Fraud prevention must be embedded into organizational governance and accountability structures.

The CACP recommends that regulated entities be required to:

- assign executive-level accountability for fraud risk management;
- integrate fraud prevention into enterprise risk and compliance frameworks; and
- establish board-level oversight of fraud controls and effectiveness.

Training requirements should be outcomes-focused, ensuring that personnel in government agencies, the justice system (judges and prosecutors), and police services understand evolving fraud methods, cross-sector risk dependencies, and their role in detection and response.

Identity validation requirements should be proportionate, risk-based, and interoperable across sectors to prevent fraudsters from exploiting inconsistencies between platforms and services.

4. Detection, Disruption, and Victim Response

Consultation Questions 18–45

Regulatory frameworks should incentivize strong detection and response mechanisms by:

- aligning liability with failure to meet prevention and detection obligations;
- recognizing effective fraud-reduction outcomes; and
- encouraging early, good-faith information sharing.

When fraud is suspected or confirmed, organizations must have clear obligations to:

- pause suspicious activity where necessary;
- remove known fraudulent actors from platforms and services;
- notify affected users promptly; and
- provide accessible and transparent recourse mechanisms.

The CACP supports the establishment of a single external dispute resolution body for fraud-related complaints, capable of issuing binding decisions and ensuring consistent treatment of victims across sectors.

5. Empowering Canadians Through Awareness

Consultation Questions 46–47

Public awareness must be treated as a continuous national effort rather than a periodic campaign.

Canadians should have access to:

- centralized, authoritative fraud-threat information;
- clear reporting pathways and victim support resources, ideally through a one-stop shop approach; and
- targeted education on identity misuse, including the compromise of government-issued identifiers such as Social Insurance Numbers.

Public messaging should be aligned across government, regulators, law enforcement, and private-sector partners.

6. Strengthening Law Enforcement and the Role of the CAFC

Consultation Questions 48–50

The Canadian Anti-Fraud Centre (CAFC) is a critical national asset but is not currently resourced or mandated to serve as a fully operational national anti-fraud authority and, at present, funding is woefully inadequate.

Bill C-29, the *Financial Crimes Agency Act*, proposes the establishment of a specialized federal law enforcement agency whose mandate is to investigate financial crimes and to contribute to the recovery of proceeds of crime.

In light of the tabling of Bill C-29, the Association will require time to fully review and assess the provisions of the proposed legislation. At this stage, we encourage the Government to consider the merits of the existing Canadian Anti-Fraud Centre, which brings an established mandate, operational expertise, and public recognition in addressing fraud, including financial crime. Consideration should be given to the potential for the proposed Financial Crimes Agency to be situated within the CAFC or, at a minimum, to operate in close collaboration with the CAFC to leverage existing capabilities and promote a coordinated approach.

The CACP recommends:

- a formal assessment of CAFC authorities, mandate, and resourcing;
- the expansion of the CAFC's role in coordinating intelligence and supporting investigations;
- dedicated national capacity for multi-jurisdictional, large-scale fraud investigations; and
- the establishment of a public-private partnership-led center of responsibility to enable sustained collaboration, information sharing, and operational coordination.

Without an empowered national hub, complex fraud investigations will continue to be fragmented and under-resourced.

7. Conclusion

Fraud is a pervasive, technology-enabled threat with significant economic, psychological, and societal impacts. The development of a National Anti-Fraud Strategy presents a critical opportunity to modernize Canada's response.

The CACP urges the Government of Canada, in partnership with provinces, territories, law enforcement, and industry, to act decisively to:

- strengthen national coordination;
- modernize legislative authorities;
- acknowledge the Canadian Anti-Fraud Centre as Canada's official agency empowered to fight fraud; and
- embed robust public-private collaboration at the core of Canada's anti-fraud ecosystem.

The CACP remains at the disposal of the Department of Finance Canada to provide expertise and feedback in advancing the development of a National Anti-Fraud Strategy.