



Creating a safer  
**Cambridgeshire**

**To:** Business Coordination Board

**From:** Chief Constable

**Date:** 16 May 2019

**CAMBRIDGESHIRE CONSTABULARY'S RESPONSE TO THE HMICFRS NATIONAL THEMATIC REPORT  
"FRAUD: TIME TO CHOOSE – AN INSPECTION OF THE POLICE RESPONSE TO FRAUD"**

**1. Purpose**

- 1.1. The purpose of this paper is to provide an update on the Constabulary's response to the report "Fraud: Time to Choose – An inspection of the police response to fraud" published by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) on 02 April 2019, to enable the Police and Crime Commissioner to discharge his duties under Section 55 of the Police Act 1996.

**2. Background**

- 2.1. Within 56 days of publication of a report by HMICFRS, the "local policing body" (the Police and Crime Commissioner) must provide a response to any report published under section 55(1) of the Police Act 1996.
- 2.2. The response must be:
- Published;
  - Sent to the Secretary of State;
  - Sent to the inspectors of constabulary.
- 2.3. The response must include:
- The local policing body's comments;
  - Any comments from the Chief Constable;
  - Any comments from the local policing body on the Chief Constable's comments.
- 2.4. The response should comment on the report as a whole. If a report includes recommendations, the comments should include an explanation of what action is being, or will be taken, or why no action is proposed.

### 3. Force response to HMICFRS recommendations:

- Recommendation 1: By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should publish a timetable for implementing the revised Know Fraud system, making clear which services are to become available at each stage of implementation and thereby enabling forces to make use of each service as early as practicable. The use made of the system by police forces should be monitored and evaluated to identify best practice.

**Response:** This recommendations is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further information.

- Recommendation 2: By 31 March 2020, the National Police Chiefs' Council Coordinator for Economic Crime and chief constables should ensure that forces have processes in place to accurately and efficiently report fraud outcomes to the National Fraud Intelligence Bureau.

**Response:** The Constabulary will evaluate its processes for reporting outcomes to the National Fraud Intelligence Bureau to ensure accurate data is provided as required.

- Recommendation 3: By August 2019, the Economic Crime Strategic Board should extend its remit to include all forms of fraud against individuals and businesses, not just serious and organised fraud.

**Response:** This recommendation is addressed to the Economic Crime Strategic Board. The Constabulary will await further information.

- Recommendation 4: By September 2019, the Home Office should publish information concerning its agreement with City of London Police to act as the national lead force for fraud. The published information should include (as a minimum) descriptions of: 1) the aims and objectives of the agreement; 2) the funding arrangement; 3) accountability and governance processes; and 4) City of London Police's performance against the agreement.

**Response:** This recommendation is addressed to the Home Office. The Constabulary will await further information.

- Recommendation 5: The National Police Chiefs' Council Coordinator for Economic Crime, in consultation with the Home Office and the Director General of the National Economic Crime Centre, should develop a national policing strategy for fraud and, by 31 March 2020, secure its approval by the NPCC for adoption by all police forces. The strategy should: 1) make clear the roles and responsibilities of police forces and regional organised crime units; 2) define the relationship between City of London Police as the national lead force, the National Crime Agency (in particular the National Economic Crime Centre) and other relevant bodies, seeking to ensure that their respective roles and responsibilities complement each other and avoid duplication; and 3) define how fraud intelligence should be developed, disseminated and put to effective use by police forces and the National Fraud Intelligence Bureau. The implementation arrangements for this strategy should include clear communication and review processes.

**Response:** This recommendation is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further information.

- Recommendation 6: With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime, working with the College of Policing, should take responsibility for

identifying, evaluating and disseminating best practice advice on the police response to fraud.

**Response: This recommendation is addressed to the NPCC Coordinator for Economic Crime and the College of Policing. The Constabulary will await further information.**

- **Recommendation 7:** By 31 March 2020, the National Police Chiefs' Council Coordinator for Economic Crime should carry out an evaluation of two National Fraud Intelligence Bureau products: monthly victim lists and six-monthly force profiles. The evaluation should include: 1) consulting with police forces to establish the uses to which these intelligence products are put; and 2) identifying any opportunities to improve the products' utility or reduce the burden on the National Fraud Intelligence Bureau with compiling them.

**Response: This recommendation is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further information.**

- **Recommendation 8:** By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces on how to: 1) accurately record and report on National Fraud Intelligence Bureau 'disseminations for enforcement' to ensure consistency and clarity for fraud-recording processes (the guidance should reassert the requirement in the Home Office Counting Rules for forces to provide the case number, the crime numbers, the suspect details and the outcome details for each such dissemination); 2) determine their response to National Fraud Intelligence Bureau disseminations for enforcement, ensuring consistency and clarity for victims of fraud; and 3) ensure that, when a force decides not to investigate, or not to continue an investigation, the victim is provided with a clear written explanation of the rationale for that decision.

**Response: This recommendation is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further guidance.**

- **Recommendation 9:** By 30 September 2019, chief constables should publish their force's policy for responding to and investigating allegations of fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).

**Response: The Constabulary will review the force's policy and procedures for responding to and investigating fraud and publish as appropriate.**

- **Recommendation 10:** With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime, when issuing to police forces advice on fraud protection that is to be given to the public (including alerts and campaigns), should take responsibility for evaluating the effectiveness of how that advice is given to the public and the effectiveness of the advice.

**Response: This recommendation is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further information.**

- **Recommendation 11:** By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces in relation to fraud-related calls for service as described in the Home Office Counting Rules. The advice should make clear to forces the circumstances in which they are expected to intervene and the circumstances in which they may refer the case direct to Action Fraud. The advice should also make clear how: 1) responses to reports of fraud may adequately meet the needs of victims; 2) vulnerable victims should be identified and dealt with appropriately; and 3) reports of fraud should be efficiently referred to Action Fraud.

**Response: This recommendation is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further guidance.**

- Recommendation 12: By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should redesign the National Fraud Intelligence Bureau dissemination for enforcement documentation to make it easier for recipients to interpret and use.

**Response: This recommendation is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further information.**

- Recommendation 13: With immediate effect, the Director General of the National Crime Agency, in consultation with the National Police Chiefs' Council Coordinator for Economic Crime, should ensure that the tasking powers of the National Crime Agency are used effectively in the case of serious and organised fraud.

**Response: This recommendation is addressed to the Director General of the National Crime Agency and the NPCC Coordinator for Economic Crime. The Constabulary will await further information.**

- Recommendation 14: With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should: 1) carry out (and subsequently evaluate) a campaign to raise the public awareness of the existence and role of Action Fraud; and 2) provide chief constables with a description of the role of Action Fraud for uploading to force websites.

**Response: This recommendation is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further information.**

- Recommendation 15: With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should take steps to remedy the absence of published performance indicators at Action Fraud. As soon as practicable, performance indicators should be set in relation to, for example, call handling waiting times and abandonment rates, online reporting and victim satisfaction levels. Thereafter, information on performance against those indicators should be published.

**Response: This recommendation is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further information.**

- Recommendation 16: By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should provide guidance to Action Fraud and chief constables. This is to ensure that, promptly on reporting a fraud, victims are provided with explanations of: 1) the role of Action Fraud; 2) the process by which their fraud report will be considered for assessment or referral to the police (or other law enforcement agency) by the National Fraud Intelligence Bureau; 3) how to obtain an update on the progress of their case; 4) how, following referral from the National Fraud Intelligence Bureau, the decision on whether and how to investigate rests with the police (or other law enforcement agency); and 5) the options open to victims of fraud to seek civil redress as an alternative (in cases where criminal investigations are not carried out or do not lead to convictions).

**Response: This recommendation is addressed to the NPCC Coordinator for Economic Crime. The Constabulary will await further guidance.**

#### 4. Force response to HMICFRS areas for improvement:

- Area for Improvement 1: Chief constables should improve the way their force uses the National Fraud Intelligence Bureau monthly victim lists to identify and support vulnerable victims and others who require additional support.

**Response:** The Constabulary has an ongoing duty of care towards vulnerable persons and adults at risk. In March 2019 the force undertook a review of its processes to identify and safeguard vulnerable victims of fraud, including its use of the National Fraud Intelligence Bureau monthly victim lists, to improve victim care and crime prevention.

- Area for Improvement 2: Chief constables should ensure their forces improve the identification and mapping of organised crime groups in which the principle criminality is fraud.

**Response:** The Constabulary will evaluate its practices for the identification and mapping of organised crime groups whose primary offence is fraud to ensure that the threat is effectively understood and managed.

- Area for Improvement 3: Chief constables should ensure that fraudsters are included among those considered for serious organised crime 'prevent' tactics, including by local strategic partnership boards and through integrated offender management processes.

**Response:** The Constabulary will evaluate its practices for the management of offenders to ensure that the commission of further offences is effectively prevented.

- Area for Improvement 4: Chief constables should increase their force's use of ancillary orders against fraudsters.

**Response:** The Constabulary will evaluate its use of ancillary orders to ensure that we are making best use of these powers in fraud cases.

- Area for Improvement 5: Chief constables ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.

**Response:** The Constabulary is committed to ensuring that all victims of crime, including victims of fraud, receive their entitlements under the Code of Practice for Victims of Crime. A review of fraud investigations will be conducted to ensure compliance.

<b>Contact Officers</b>	T/DCS Martin BRUNNING – Head of Vulnerability, Intelligence and Specialist Crime Det. Supt. Rebecca TIPPING – Director of Intelligence Alice THOMPSON – Governance & Inspection Assistant
<b>Reference Document</b>	<a href="https://www.justiceinspectors.gov.uk/hmicfrs/wp-content/uploads/fraud-time-to-choose-an-inspection-of-the-police-response-to-fraud.pdf">https://www.justiceinspectors.gov.uk/hmicfrs/wp-content/uploads/fraud-time-to-choose-an-inspection-of-the-police-response-to-fraud.pdf</a>