

**ORIGINATOR: CHIEF CONSTABLE**

**PAPER NO: AP23/45**

**SUBMITTED TO: ACCOUNTABILITY AND PERFORMANCE PANEL –  
15 SEPTEMBER 2023**

**SUBJECT: CRIME, SAFEGUARDING & INCIDENT MANAGEMENT (CSIM) /  
COUNTY POLICING COMMAND – RESPONDING TO FRAUD**

**SUMMARY:**

1. This report provides information relating to Suffolk Constabulary’s performance in the area of fraud detailing force data and that from the National Fraud Intelligence Bureau.
2. The report sets out Suffolk Constabulary’s current capabilities and approaches to the management of fraud.
3. Areas of Strategic focus and operational development are set out, highlighting current and future improvement activity.

**RECOMMENDATION:**

1. The Police and Crime Commissioner (PCC) is asked to consider the contents of this report and progress made by the Constabulary and raise issues with the Chief Constable as appropriate to the PCC’s role in holding the Chief Constable to account.

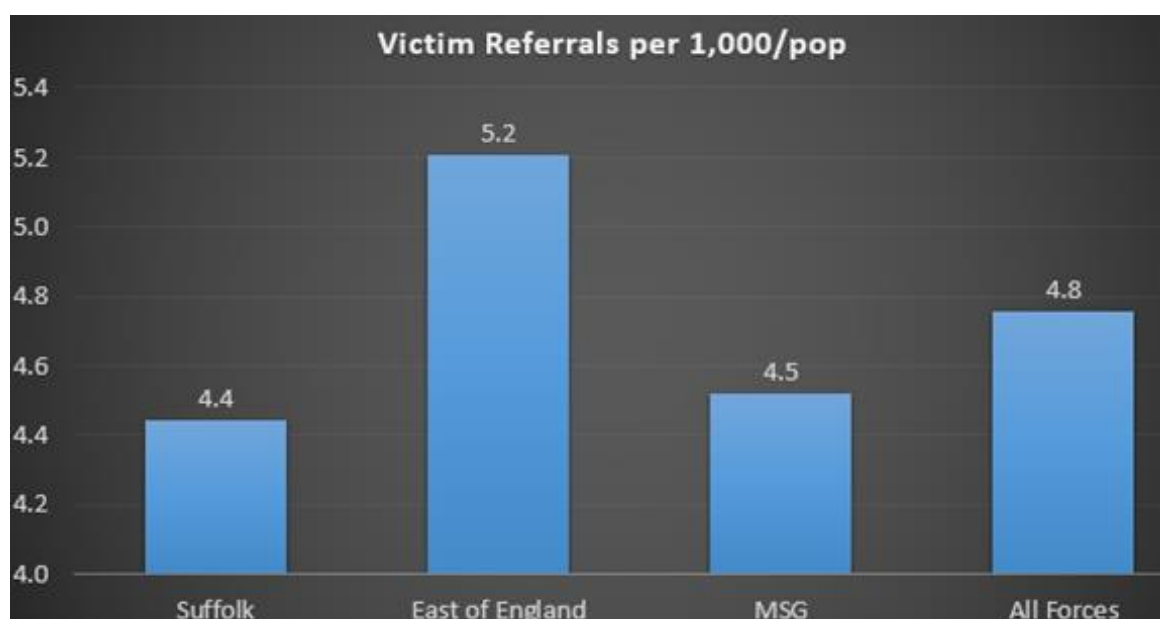
## DETAIL OF THE SUBMISSION

### 1. INTRODUCTION

- 1.1 This report covers fraud performance data during the period of 1<sup>st</sup> July 2022 until 30<sup>th</sup> June 2023.
- 1.2 This paper supports the Police and Crime Plan commitment which states that the Constabulary will strengthen its approach to fraud investigation, prevention and victim support.
- 1.3 The strategic management of fraud is delivered by the Detective Chief Superintendent of Crime and Safeguarding Incident Management (CSIM) with operational delivery being within Workflow Management and Investigations departments. Chief Officer oversight of fraud delivery is provided by Temporary Assistant Chief Constable Eamonn Bridger. A Fraud Delivery Group is chaired by the Detective Chief Inspector Workflow Management providing tactical delivery of development and improvement.

### 2. FRAUD PERFORMANCE

- 2.1 Fraud is reported to the Constabulary via two main routes. The first are reports made directly to the force that meet the criteria for a 'call for service' as defined within crime recording standards. These are where a suspect is identified as being resident in Suffolk, a suspect has been arrested in Suffolk or there is a crime in action where the suspect is present in Suffolk. The second route relates to disseminations from the National Fraud Intelligence Bureau (NFIB) after examination and analysis of Action Fraud reports.
- 2.2 NFIB provide police force areas with performance data. This data relates to Home Office Crime recording outcomes and returns to NFIB with updates on disseminations made to police force areas.
- 2.3 NFIB data demonstrates that during the reporting period of July 2022-June 2023 there are 4.4 victims of crime per 1000 head of population.



- 2.4 During the 12 month period of July 2022 - June 2023 there were 3,484 fraud reports made to Action Fraud that relate to Suffolk. This had a total reported financial loss of £15.1 million.
- 2.5 Consumer fraud remains the most prominent fraud type nationally which includes cheque, plastic card, online bank accounts, online shopping, online auctions, and application related frauds.
- 2.6 Data collated by Action Fraud demonstrates that 90% of reported fraud crime nationally relates to individual victims. NFIB data demonstrates that within Suffolk 94% of fraud crime pertains to individual victims making it slightly higher than the national average.
- 2.7 Suffolk Constabulary has recorded 637 fraud investigations in the last 12 months, which is an increase of 36.7% on the previous 12 months. This increase is attributable to a complex series of investigations recorded by Suffolk Constabulary (231 crimes recorded) during the reporting period which are being investigated outside of Suffolk Constabulary.
- 2.8 The solved rate for fraud investigations during this reporting period is 12.4% which is a decrease of 7.1%. The 231 investigations being investigated outside of Suffolk Constabulary is the main contributing factor for the decrease in solved rate. With these investigations removed the solved rate would be calculated at 19.5% which mirrors that of the previous reporting period.
- 2.9 Further statistical information can be found in Appendix A

### **3. POLICING IMPROVEMENT**

- 3.1 The City of London's National Coordinator's Office (NCO) has conducted engagement visits to all forces in England, Wales, Scotland and Northern Ireland, and in June 2023 published the Force Engagement Report to improve the response to tackle the threat from fraud.
- 3.2 Within the report 23 recommendations were provided to law enforcement agencies to improve their ability to tackle the threat from fraud. The recommendations are formed into three key areas: 1. *Strategic Governance, Structure and Performance* 2. *Intelligence, Triage and Investigation* 3. *Protect and Safeguarding*
- 3.3 Suffolk Constabulary has incorporated the recommendations with operational delivery being managed by the Fraud Assessment Unit Detective Inspector, and strategic compliance being governed through the Fraud Delivery Group.
- 3.4 Suffolk Constabulary published its updated Fraud Allocation and Investigation policy in December 2022. This includes both calls for service and disseminations from NFIB.
- 3.5 Suffolk Constabulary has established processes for the identification and mapping of Organised Crime Groups (OCG). The Joint Suffolk & Norfolk Organised Crime meeting (OCGM) works in partnership with the Regional Organised Crime Unit ERSOU, providing co-ordination and management of OCG's.
- 3.6 The Constabulary is focused upon identifying OCGs involved in fraud through tasking, intelligence development and through the work of the Cyber Specialist Capability team who receive cyber fraud referrals from NFIB. The Cyber specialist capability team are trialing

systems that are likely to increase intelligence relating to online fraud and provide opportunities for early preventative actions.

- 3.7 The Constabulary can provide examples of working in partnership with other agencies to combat OCGs and tackle fraud as a secondary crime type. These have included joint working with the Department for Work & Pensions (DWP) and Her Majesties Revenue and Customs (HMRC) and have resulted in large scale disruption of fraudulent activity.
- 3.8 Lead Responsible Officers (LRO) for OCGs in Suffolk have received briefings that include recognised tactics under four key areas of prevent, pursue, protect and prepare, and have access to National Crime Agency (NCA) disruption guidance. Organised Crime issues are discussed at the Safer Stronger Communities Group (SSCG) which is a strategic partnership in Suffolk.
- 3.9 Suffolk Constabulary through the joint Suffolk and Norfolk Cyber Specialist Capability team is supporting the Regional Cyber Resilience Centre and Cyber alarm programme as a strategic business collaboration, which supports preventative measures.
- 3.10 Suffolk Constabulary follow the guidance issued by the NFIB in relation to calls for service. Advice is available to the public on the Constabulary website and guidance for staff accessible via the intranet. Mandated audits are completed by staff in the Fraud Assessment Unit (FAU).
- 3.11 In many cases victims will be in contact with Action Fraud prior to contact with Suffolk Constabulary, and will have been provided with information about safeguarding and preventative measures.
- 3.12 Suffolk Constabulary publishes information on its website providing clear guidance and advice to the public, together with links to Action Fraud, CIFAS (Fraud Prevention), The Financial Conduct Authority, Financial Ombudsman and Trading Standards
- 3.13 Staff within the Crime Co-ordination Centre (CCC), Contact and Control Room (CCR), and Fraud Investigators, provide information and guidance to victims. An additional process has been adopted within the CCC to enable victims to receive an email with crime prevention guidance. Police staff visit those considered most at risk or vulnerable and provide information packs to victims where appropriate.
- 3.14 The Cyber Specialist Capability team has recruited a Digital Security Adviser to assist specifically with provision of information to victims of Cyber Fraud. The team has also developed a system that will produce bespoke written advice based upon the type of Cyber Fraud experienced, which is sent to victims.
- 3.15 When relevant, Constabulary staff complete vulnerable person referrals for multi-agency assessment. These are processed by the Multi-Agency Safeguarding Hub (MASH).
- 3.16 Suffolk Constabulary complies with the national protocol of updating victims when an investigation is recorded locally after an NFIB referral. The recording officer is responsible for contacting the victim, agreeing the contact, and ensuring they are aware of the transfer of responsibility to a Suffolk investigator.
- 3.17 Fraud investigations are recorded in the same way as all other investigations utilising an 8-point investigation plan. Processes within Athena (crime recording system) to ensure compliance with the Victim's Code of Practice (VCOP) applies to all Suffolk Fraud.
- 3.18 In February 2023 Suffolk Constabulary successfully obtained central funding to work in collaboration with the NCA's National Economic Crime Centre and the City of London police

on a national enforcement campaign. Under the auspices of Operation Henhouse, Suffolk Constabulary were able to use the funding to pursue outstanding fraud suspects and advance existing fraud investigations.

- 3.19 Money Mules are identified by Suffolk Constabulary through banking enquiries completed by Financial Intelligence Officers (FIOs) within the FAU.
- 3.20 If the money mule has no previous offending history then the criminal matter is dealt with by way of a cease and desist notice. Relevant advice and guidance is also given around crime prevention and vulnerabilities are recorded and directed towards the MASH. Cease and desist notices are a form of disruption recognised by the NFIB.

#### **4. CURRENT CAPABILITY**

- 4.1 Suffolk Constabulary has three dedicated fraud posts, which are within the Fraud Assessment Unit within the Crime Co-ordination Centre (CCC) based at Police Headquarters Martlesham. The posts are Detective Constable roles, overseen by a Detective Sergeant. These officers have attended the specialist Fraud Investigators course delivered by the City of London Fraud Academy. The officer's role is to provide early assessment of reported fraud crimes and disseminations from NFIB in line with the National Fraud Investigation Model (FIM). Using their specialist knowledge, they provide investigative plans and support investigators across the Constabulary.
- 4.2 The Constabulary also has a pool of five detectives based within Criminal Investigation Departments who have also attended the fraud investigators course delivered by the City of London Fraud Academy. These officers further fraud investigations in their locality and support colleagues by providing advice and guidance.
- 4.3 Suffolk Constabulary has four senior officers who are accredited as Fraud Managers having attended the Counter Fraud Managers course hosted by the City of London Police.
- 4.4 The Joint Suffolk and Norfolk Constabularies Specialist Crime and Intelligence Directorate has resources that contribute to tackling Fraud. The team provide a reactive response and undertake work to prevent and protect the public against Cyber dependant Fraud.
- 4.5 The Intelligence Directorate has several staff trained to utilise systems to support intelligence development in relation to financial and fraud investigations. These staff are located within the area intelligence teams and the joint force intelligence team based at Suffolk Police Headquarters.

#### **5. ORGANISATIONAL DEVELOPMENT**

##### **5.1 Strategic Focus**

- 5.1.1 In May 2023 the Home Office published the Fraud Strategy. The strategy focusses on three key actions: *Pursue fraudsters*, *Block fraudsters* and *Empower the public*.
- 5.1.2 Suffolk Constabulary is due to update their Fraud Strategic Plan in 2024 which will align with the National Fraud Strategy.
- 5.1.3 The current force fraud policy will be reviewed to ensure that it encompasses the objectives within both local and national strategies.

## 5.2 Operational Delivery

- 5.2.1 The current Constabulary Fraud Strategic Plan 2021/23 sets out key areas for operational delivery under each area of strategic focus. These are delivered through a three-year continuous improvement plan, which has been produced to document specific actions and progress, with accountability through the fraud delivery group.

 <b>SUFFOLK CONSTABULARY</b>		
OUR APPROACH		
 <b>CAPABLE</b> Strengthen capabilities to disrupt and prevent fraud	<b>Strategic Focus</b>	<b>Operational Delivery</b>
 <b>COORDINATED</b> Work collaboratively across policing and with partners		
 <b>PROTECTIVE</b> Reduce harm to victims and communities		
 <b>EFFECTIVE</b> Target resources intelligently and demonstrate impact		
Suffolk Constabulary recognises the impact of fraud upon people who live, work, visit and invest in Suffolk and this plan sets out the strategic response to fraud, supporting the Constabularies Strategic Plan 2020/23 & the National Fraud Policing Strategy 2019/22.		
	<b>Reducing harm to victims of fraud</b>	<ul style="list-style-type: none"> <li>Use effective systems to identify the most vulnerable to fraud.</li> <li>Ensure victims are effectively signposted to support services.</li> <li>Provide effective interventions to reduce repeat victimisation.</li> </ul>
	<b>Building workforce capability</b>	<ul style="list-style-type: none"> <li>Invest in fraud intelligence capability.</li> <li>Make effective use of the City of London Fraud Academy providing investigators and senior investigating officers with specialist skills.</li> </ul>
	<b>Conducting quality fraud investigations</b>	<ul style="list-style-type: none"> <li>Respond effectively to 'calls for service' as defined by Action Fraud.</li> <li>Improve the number of positive outcomes from 'calls for service'.</li> <li>Improve the timeliness of investigations and information provided to the National Fraud Intelligence Bureau.</li> </ul>
	<b>Working together to counter fraud</b>	<ul style="list-style-type: none"> <li>Support regional development of best practice.</li> <li>Access specialist financial operational support at the Eastern Region Specialist Operations Unit &amp; City of London Police.</li> <li>Demonstrate collaborative working with partner agencies to counter fraud and support victims.</li> </ul>

- 5.2.2 The City of London's Fraud Engagement Action Sheet is used to support the Force Strategic Plan.

## 5.3 Examples of Progress

### 5.3.1 Reducing Harm to Victims of Fraud

- 5.3.2 The Constabulary has recently reviewed the process undertaken to identify victims of fraud who may be considered the most vulnerable and sets out the subsequent contact that is made with them. This is conducted under the Constabulary's Operation Sanctuary. The revised process will now see fraud trained officers contacting the most vulnerable victims. These officers can apply a specialist fraud investigative mindset to gathering evidence and intelligence in relation to Action Fraud reported incidents, as well as identifying any wider support that may be beneficial and help to prevent any future incidents.

- 5.3.3 The National Economic Crime Victim Care Unit (NECVCU) categorises victims of fraud into three areas based on vulnerability. Previously, the NECVCU only supported Level 1 victims, however in April 2023 the NECVCU commenced a service to Suffolk Constabulary undertaking all level 2 victim contact (non-vulnerable) and contact with those victims deemed vulnerable but who have not opted for victim support services.

- 5.3.4 Level 3 victims are deemed most vulnerable and as such are provided with in-person support by the Constabulary.

- 5.3.5 In support of Operation Sanctuary and the adoption of the NECVCU service, the Constabulary has updated records of both national and local services that may assist victims

of fraud. Information on the Constabulary's website is regularly updated with key information and support services, along with the promotion of national fraud related initiatives.

#### 5.3.6 Building Workforce Capability

5.3.7 Police officer and police staff access to fraud intelligence and research systems has been reviewed and increased to provide specialist officers the tools to support their work. The three Detective Constables within the Fraud Assessment Unit (FAU) have all undertaken the course and are accredited fraud intelligence analysts.

5.3.8 It is the intention to build capacity within Criminal Investigation Departments at Lowestoft, Ipswich and Bury St Edmunds by sending further detectives on the City of London Fraud Academy course.

#### 5.3.9 Conducting Quality Fraud Investigations

5.3.10 Work is being undertaken to improve the quality of police investigations across Suffolk Constabulary through Operation Investigate, which is overseen by a Detective Superintendent.

5.3.11 Fraud investigations are included within current force auditing processes, but an additional audit of positive outcomes is being undertaken to identify any force level trends and good practice. Assessment of initial calls relating to fraud into the Constabulary's Contact and Control room has been undertaken and further work to support staff awareness of the criteria for 'calls for service' completed.

5.3.12 Suffolk Constabulary is represented at regional fraud and economic crime delivery groups, which seeks to share best practice. This will continue with any areas of best practice being considered for adoption within Suffolk.

5.3.13 The PowerBi analytical product available to crime managers has been updated and permits a greater depth of scrutiny into fraud performance at both local and force wide levels.

#### 5.3.14 Working Together to Counter Fraud

5.3.15 The Constabulary already works with several key partners in relation to fraud including the Eastern Region Specialist Operations Unit, National Crime Agency and City of London Police. In addition, Suffolk Constabulary works collaboratively with colleagues in Norfolk Constabulary to share best practice and access shared resources within Protective Services. There is regular dialogue between fraud investigators in Suffolk and staff within the Joint Suffolk & Norfolk Cyber unit due to interconnectivity between many fraud offences and cyber-crime.

5.3.16 Suffolk Constabulary supports a multi-agency approach to tackling fraud and is seeking to further good working relationships with Suffolk Trading Standards and the Multi-Agency Safeguarding Hub (MASH).

## 6. **FINANCIAL IMPLICATIONS**

6.1 To support improvement in many of the areas outlined, additional investment in training and people to fulfil key functions will be required.

## 7. **RISKS**

- 7.1 Suffolk Constabulary has a small number of dedicated fraud staff by comparison to other police forces within the Eastern Region. Outside of the joint Suffolk & Norfolk Cyber team there are no dedicated staff undertaking prevent or protect related activity in relation to fraud. This will limit the ability to develop policing improvements.
- 7.2 The Constabulary has seen little improvement in the ability to demonstrate identification of organised crime groups where the primary criminality is fraud, use of ancillary orders in connection with fraudsters or co-ordinated prevent activity in relation to organised fraud criminality.
- 7.3 It is recognised that fraud is under reported to both Action Fraud and policing, therefore the true scale of this type of criminality and its impact within Suffolk is unknown. Barriers to reporting exist that need to be better understood and overcome, which enhanced prevent and protect multi-agency activity would support.

## **8. OPPORTUNITIES**

- 8.1 There are opportunities to progress a multi-agency hub approach to fraud investigation and prevention. Further connectivity between agencies is likely to lead to consistent approaches to victim support, coherent and aligned messaging, a reduction in duplication with more complete assessments of fraud through information sharing.
- 8.2 The Eastern Region Specialist Operations Unit are investing in additional capabilities within the area of economic crime. As mentioned within the new UK Fraud Strategy, there will also be the establishment of a new National Fraud Squad.

## **9. CHIEF OFFICER CONCLUSION**

- 9.1 There continues to be growth in Fraud criminality nationally and Suffolk are seeing increases in referrals. When set against calls for service however, our demand remains steady. Local capability remains stable with supportive governance and accountability through the region and with partners. Suffolk continues to have one the lowest numbers of victims of fraud per 1000 head of population nationally.
- 9.2 Use of advanced technology by criminals and OCGs provides national as well as local challenge. Suffolk works closely in partnership with local and national organisations to ensure focus is on prevention and harm reduction, particularly towards our most vulnerable victims. Continued scoping and development of innovative processes and working practices provide improved intelligence and evidence capture.



Suffolk Constabulary Fraud Performance data

Data up to end of June 2023

<b>Supporting vulnerable victims</b>	<b>Last 12M</b>	<b>Previous 12M</b>	<b>Diff against Previous 12M</b>	<b>Long-term average</b>	<b>Diff against long-term average</b>
<b>Fraud</b>					
<b>Crime</b>					
<i>Fraud Referral volume</i>	364	152	↑139.5%	147	↑147.6%
<i>Fraud Calls for Service</i>	273	314	↓13.1%	427	↓36.1%
<i>Fraud Referrals and Calls for Service combined</i>	637	466	↑36.7%	574	↑11.0%
<i>Solved number</i>	79	91	↓13.2%	83	↓4.8%
<i>Solved rate</i>	12.4%	19.5%	↓7.1pp	14.5%	↓2.1pp
<i>Live Fraud Investigations</i>	232				
<b>Victims</b>					
<i>Victim count</i>	582	386	↑50.8%	471	↑23.6%
<i>Victim age: Under 18</i>	1.0%	3.1%	↓2.1pp	2.1%	↓1.1pp
<i>Victim age: 18-34</i>	22.0%	29.5%	↓7.5pp	28.7%	↓6.7pp
<i>Victim age: 35-49</i>	33.0%	22.8%	↑10.2pp	22.3%	↑10.7pp
<i>Victim age: 50-64</i>	28.2%	20.5%	↑7.7pp	20.0%	↑8.2pp
<i>Victim age: 65 and over</i>	14.9%	22.0%	↓7.1pp	24.4%	↓9.5pp
<i>Victim age: Not known</i>	0.9%	2.1%	↓1.2pp	1.9%	↓1.0pp
<i>Victim gender: Male</i>	55.8%	45.6%	↑10.2pp	46.3%	↑9.5pp
<i>Victim gender: Female</i>	36.9%	51.8%	↓14.9pp	50.3%	↓13.4pp
<i>Victim gender: Not known</i>	7.2%	2.6%	↑4.6pp	3.0%	↑4.2pp
<i>Victim ethnicity: White</i>	36.9%	56.5%	↓19.6pp	53.9%	↓17.0pp
<i>Victim ethnicity: Not known</i>	61.5%	41.2%	↑20.3pp	42.5%	↑19.0pp
<i>Victim ethnicity: Black</i>	1.2%	1.3%	↓0.1pp	1.7%	↓0.5pp
<i>Victim ethnicity: Asian</i>	0.2%	1.0%	↓0.8pp	1.3%	↓1.1pp
<i>Victim ethnicity: Other</i>	0.2%	0.0%	↑0.2pp	0.0%	↑0.2pp
<b>Suspects</b>					
<i>Suspect count</i>	841	436	↑92.9%	450	↑86.9%
<i>Suspect age: Under 18</i>	1.7%	6.0%	↓4.3pp	5.3%	↓3.6pp
<i>Suspect age: 18-34</i>	48.9%	59.2%	↓10.3pp	49.1%	↓0.2pp
<i>Suspect age: 35-49</i>	42.6%	22.9%	↑19.7pp	30.9%	↑19.7pp
<i>Suspect age: 50-64</i>	5.1%	7.3%	↓2.2pp	8.9%	↓3.8pp
<i>Suspect age: 65 and over</i>	0.8%	1.8%	↓1.0pp	2.2%	↓1.4pp
<i>Suspect age: Not known</i>	1.0%	2.8%	↓1.8pp	2.9%	↓1.9pp
<i>Suspect gender: Male</i>	54.0%	62.8%	↓8.8pp	63.6%	↓9.6pp
<i>Suspect gender: Female</i>	45.5%	35.8%	↑9.7pp	34.9%	↑10.6pp
<i>Suspect gender: Not known</i>	0.5%	1.4%	↓0.9pp	1.3%	↓0.8pp
<i>Suspect ethnicity: White</i>	90.4%	81.2%	↑9.2pp	78.0%	↑12.4pp
<i>Suspect ethnicity: Not known</i>	7.5%	16.1%	↓8.6pp	16.9%	↓9.4pp
<i>Suspect ethnicity: Black</i>	1.7%	1.8%	↓0.1pp	3.6%	↓1.9pp
<i>Suspect ethnicity: Asian</i>	0.4%	0.7%	↓0.3pp	0.7%	↓0.3pp
<i>Suspect ethnicity: Other</i>	0.1%	0.2%	↓0.1pp	0.0%	↑0.1pp