

The Rt Hon Priti Patel MP
Home Secretary
Home Office
2 Marsham Street
London

Our ref:TP/VS

4 October 2021

Dear Home Secretary

RE: HMICFRS Spotlight Report: A review of the Fraud Inspection - A time to choose.

Thank you for the opportunity to comment on the HMICFRS review of its fraud inspection. Suffolk Constabulary has provided an update on these recommendations, detailing the approach in Suffolk, which is attached.

The response from the Constabulary reflects the desire to support victims of fraud, work with other forces and victim support services. It also recognises the need to understand vulnerability in the appropriate provision of information and advice.

Fraud is a component in a plethora of offences (both on and off-line); it impacts the public and exploits vulnerable people. While victims live in police force areas, some perpetrators cross local, regional and national policing borders. This makes fraud challenging to deal with and necessitates that local policing is supported by national and regional mechanisms to prevent, disrupt and tackle offenders and support victims.

My draft Police and Crime Plan includes a commitment to monitor the Suffolk Constabulary approach to dealing with Fraud. Therefore, my intention is that, alongside tracking progress with HMICFRS recommendations, I will be monitoring annual reports on the Suffolk Constabulary response to Fraud through my Accountability and Performance governance arrangements.

Yours sincerely



Tim Passmore, Police and Crime Commissioner for Suffolk

Subject	HMICFRS Spotlight report A review of Fraud: Time to Choose
Date	09/08/2021
PURPOSE	Suffolk Constabulary Response to the HMICFRS inspection report
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COMMISSIONED BY	T/DCS Andy SMITH

INTRODUCTION

This briefing note is written in response to the HMICFRS Spotlight report 'A review of Fraud: Time to Choose' published on 5th August 2021. This review assesses the progress of Policing against the recommendations and areas for improvement previously set out in the 'Fraud: Time to choose – An Inspection of the police response to fraud 2019' report.

Recommendations

HMICFRS in the 2019 report highlighted 16 areas for improvement (AFI). The 2021 review considers that not enough has changed in the Policing response to fraud, in particular:

- Too many victims receive a poor service and are denied justice.
- Police investigations & prevention activity in relation to Fraud remain under resourced and are not prioritised.
- There are too few fraudsters who are still not held to account.

Out of the 16 areas for improvement, HMICFRS consider that 5 areas still require further work within Police force areas and 3 further recommendations are presented, 2 being relevant for Chief Constables.

This report presents Suffolk Constabulary's position in relation to these.

Suffolk Constabulary overview

Fraud is contained within the Constabulary 20/23 strategic plan as an operational priority.

The Constabulary responded to the 2019 HMICFRS report with a review of how it responds to calls for service and supports victims of Fraud. This resulted in revised processes for receiving, assessing and responding to referrals received from the National Fraud Intelligence Bureau (NFIB) and those directly received from the public. The Constabulary's performance in relation to the timely management of NFIB referrals has improved considerably as a result.

The Constabulary created a Fraud Improvement Plan to deliver against the NPCC National Fraud Policing Strategy 2019-22 and the 2019 HMICFRS report, with oversight from a Fraud Delivery Board. A further review of the Constabularies response to Fraud will be undertaken in the next few months.

At the current time Suffolk Constabulary have dedicated 3 detective constables to Fraud, working within the constabulary's Crime Coordination Centre (CCC). The officers review crimes that are referred to the Constabulary from NFIB for investigation. Using the knowledge gained from specialist training they set investigation plans, before crimes are sent to investigating officers within Criminal Investigation Departments or Safer Neighbourhood teams. The officers will retain a small number of investigations themselves and will provide ongoing advice to other investigators. Solved rates for fraud at the time of writing are 11 % (2021).

Five remaining areas for improvement

HMICFRS comment that while nationally the police have made improvements and a clear NPCC strategy is now in place, resourcing remains insufficient, with demand not matching resource allocation. Further consistency is needed in relation to identifying and responding to Organised Crime Groups involved in Fraud, with best practise being shared.

HMICFRS also consider that further improvements are still required Nationally to improve the service provided to victims.

HMICFRS previously recommended that the police should:

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 (NFIB) disseminations for enforcement)

Suffolk Constabulary published its Fraud Allocation and Investigation policy on 16th December 2019. This includes both calls for service and disseminations from NFIB. A review of this policy will take place ahead of the published date of 16th December 2022.

In addition, internal guidance for Constabulary staff is available on the intranet including a flow chart to assist staff in understanding the processes adopted.

AFI 2

Chief constables should ensure that their force improves the identification and mapping of organised crime groups in which the principal criminality is fraud.

Suffolk Constabulary have 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.

Suffolk as a county have a comparatively low number of identified OCG's and currently none of those identified are assessed as operating fraud as their principal crime type.

The Constabulary is however 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.

The Constabulary can provide examples of OCGs where working in partnership with other agencies to tackle fraud as a secondary crime type has and is being undertaken. These have included joint working with the Department for Work & Pensions (DWP) and Her Majesty's Revenue and Customs (HMRC) and have resulted in large scale disruption of fraudulent activity.

AFI 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.

AFI 14

Chief constables should increase their force's use of ancillary orders against fraudsters.

Lead Responsible Officers (LRO) for OCGs in Suffolk have received briefings that include recognised tactics under the four P's, including Prevent and have access to NCA disruption guidance. Organised Crime issues are discussed at the Safer Stronger Communities Board (SSCB) which is a strategic partnership in Suffolk.

Suffolk Constabulary through the joint Suffolk & Norfolk Cyber Specialist Capability team are supporting the Regional Cyber Resilience Centre and Cyber alarm programme as a strategic business collaboration, which supports preventative measures.

Fraud is not currently an index offence that meets the Integrated Management of Offenders model (IOM). IOM staff attend the OCGM and are integral to the discussions regarding interventions with OCG subjects. If offenders have Fraud offending in addition to index offences then they will be included within current processes, although this is data that is not currently recorded.

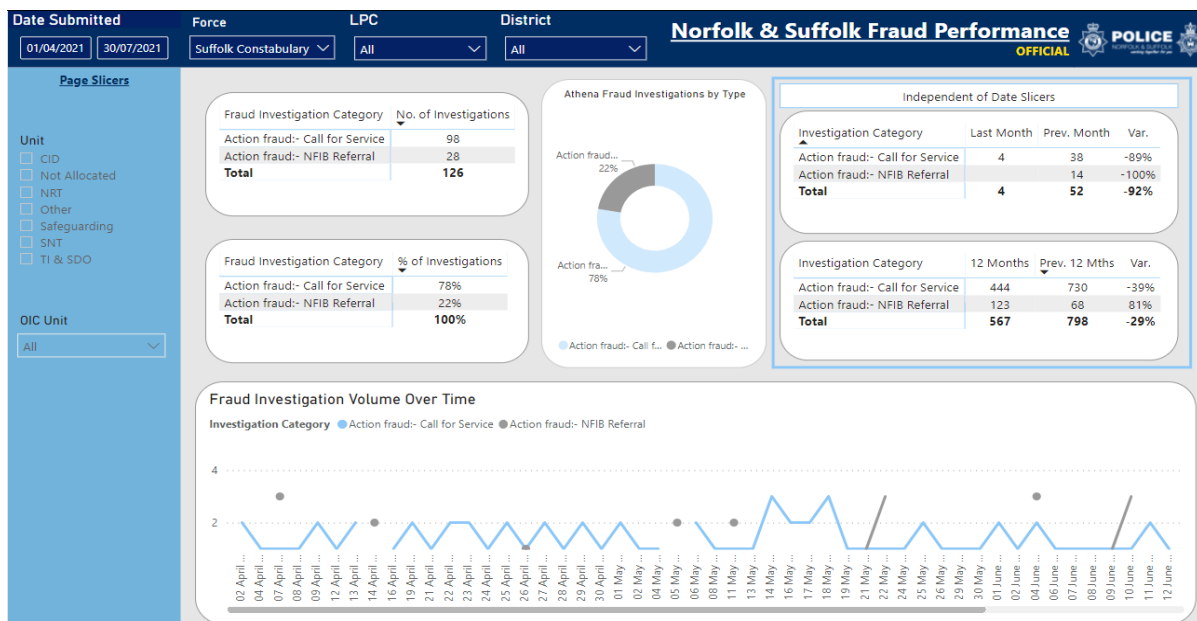
Suffolk Constabulary currently have 4 Serious Crime Prevention Orders (SCPO). Fraud is the primary offence for 1 of these orders. The orders are monitored on a regular basis for compliance between the Joint Suffolk / Norfolk intelligence team and the owning department. Awareness of SCPOs has been increased through LRO briefings and promoted by Suffolk's Serious Crime Disruption Teams (SCDT) with the aim of increasing use.

Recommendation 1 (2021)

By 30 September 2021, chief constables should make sure that their forces are following the guidance issued by the NPCC Coordinator for Economic Crime about fraud-related calls for service

Suffolk Constabulary do follow the guidance issued in relation to calls for service. Advice is available to the public on the Constabulary website and guidance for staff accessible via the intranet. Regular audits are completed by staff in the CCC.

In addition, a fraud performance tool has been created by Strategic Business Operational Services (SBOS), aiding audit and compliance processes, as well as understanding demand. An example of the data available is provided below, which shows calls for service in the period 1st April 2021 to 30th July 2021.



Recommendation 3 (2021)

By 31 October 2021, chief constables should adopt the guidance issued in September 2019 by the NPCC Coordinator for Economic Crime that was aimed at improving the information given to victims when reporting fraud

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.

Suffolk Constabulary has information contained 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: [Fraud | Suffolk Constabulary](#)

Staff within the CCC, Contact & Control Room (CCR) and 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. For those considered most at risk or vulnerable,



the Cyber Specialist Capability team and officers conducting home visits (reduced during the Covid pandemic) will provide information packs to victims where appropriate.

The Cyber Specialist Capability team have recruited a Digital Security Adviser to assist specifically with provision of information to victims of Cyber Fraud. The team have also developed a system that will produce bespoke written advice based upon the type of Cyber Fraud experienced, which is sent to victims.

Constabulary staff, when relevant, complete vulnerable person referrals for multi-agency assessment.

Suffolk Constabulary recognises that a victim needs to be updated when an investigation is undertaken from an NFIB referral. The recording officer is responsible for contacting the victim, agreeing the contract and ensuring they are aware of the transfer of responsibility to a Suffolk investigator.

Fraud investigations are recorded in the same way as other investigations, using an 8-point investigation plan. Processes within Athena to ensure compliance with VCOP applies to all Suffolk Fraud.

Bi-monthly audits are carried out on Fraud Investigations picked at random from the East, South and West command areas in Suffolk to ensure compliance and quality of service to victims.