| ORIGINATOR: CHIEF CONSTABLE | PAPER NO: AP24/42 |

| SUBMITTED TO: | ACCOUNTABILITY AND PERFORMANCE PANEL - 13 SEPTEMBER 2O24 |

| 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 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 1ˢᵗ July 2023 until 30ᵗʰ June 2024.

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, Safeguarding and Incident Management (CSIM) with operational delivery being within Workflow Management and Investigations departments. Chief Officer oversight of fraud delivery is provided by Assistant Chief Constable Eamonn Bridger. A Fraud Improvement Panel is chaired by the Detective Chief Inspector Workflow Management, providing tactical delivery of development and improvement.

2.   FRAUD PERFORMANCE

2.1.   The performance data presented is taken from Power BI, where all Constabulary fraud data can be accessed. Performance data in Power BI is recorded from 1 August 2021 and encompasses data from the National Fraud Intelligence Bureau (NFIB).

2.2.   There are three primary classifications of fraud encapsulated within the data presented:-

- Action Fraud Call for Service – These are investigations reported directly to the Constabulary where the offence has occurred in Suffolk and the suspect is also based in Suffolk;

- Action Fraud NFIB Referral – These are investigations received by the Constabulary, sent by the NFIB, following assessment by Action Fraud. Such investigations have been developed and a suspect has been identified in our policing area for the Constabulary to progress;

- Non-crime Financial Investigation – These investigations are reported directly to the Constabulary and are when suspects are unknown or not within Suffolk. This would include frauds where it is apparent the suspect is not within the UK.

2.3.   Due to the collation of data in Power BI, we can show nearly three full years of the same type of metrics captured. Subsequently this is shown in a table format, below. Please note that due to the start of data collation the first period is ten months; 1 August 2021 to 30 June 2022. The data is presented in this way to show like-for-like comparisons, which can consistently be reported on for future reporting periods.

Table 1, below, shows the data for the three primary fraud classifications.

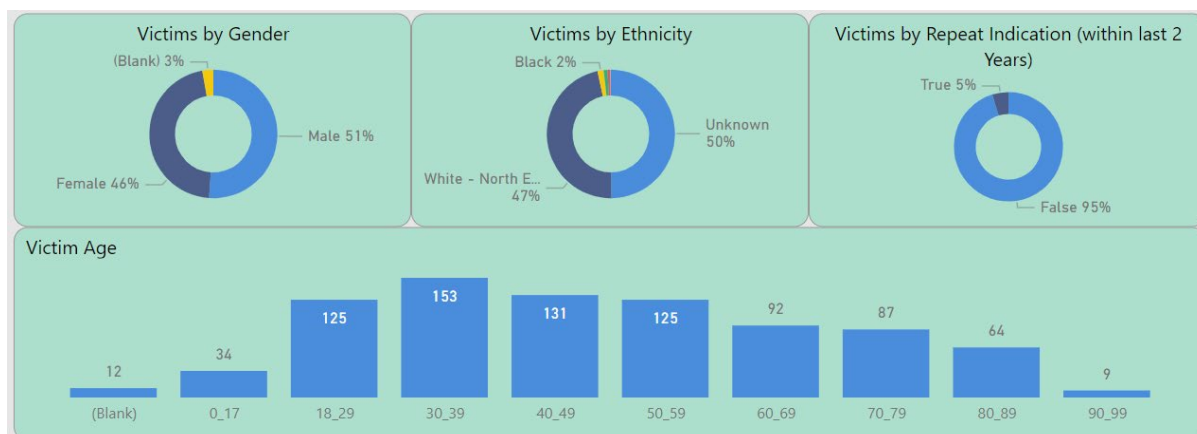| Metric Measured	1/8/21 – 30/6/22	1/7/22 - 30/6/23	1/7/23 – 30/6/24
Total Investigations	594	940	1068
Action Fraud Call for Service	289	261	351
Action Fraud NFIB Referral	142	359	142
Non-Crime Financial Investigation	163	320	575
Investigations with a Positive Outcome	67	59	104
Live investigations from that period	28	38	154
Number of fraud victims	467	766	830
Number of fraud suspects	309	314	335

Line chart 1, below, plots the overall totals from table 1, above, for the period 1 August 2021 to 30 June 2024.
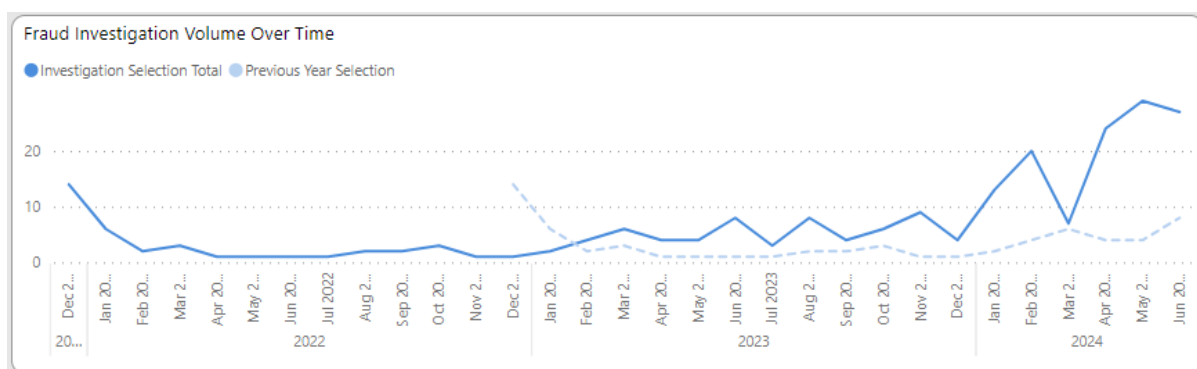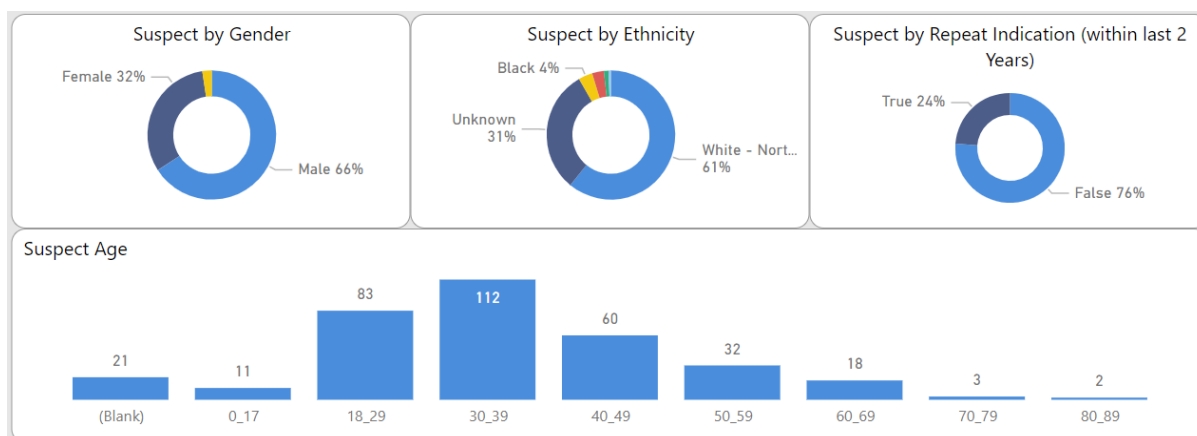

Line chart 2, below, plots the total investigations for the current reporting period, 1 July 2023 to 30 June 2024, with a comparison against the previous 12-month period.
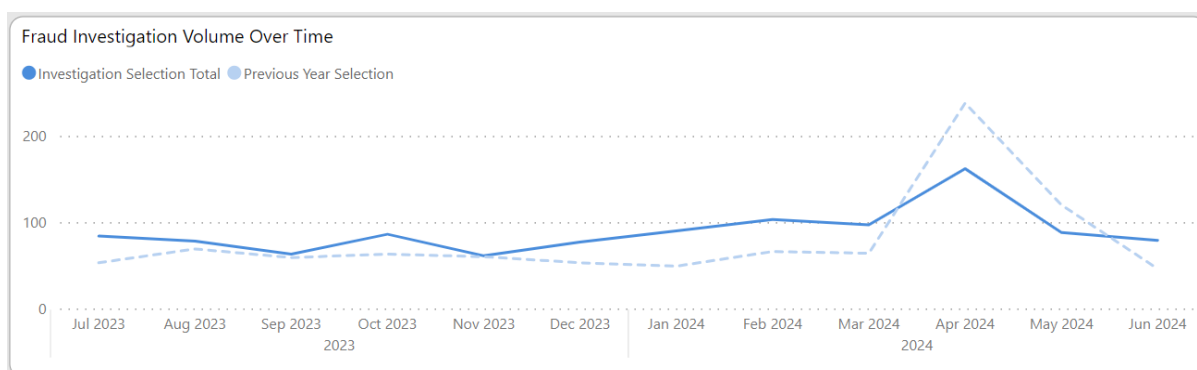
The below charts provide an analysis of fraud victims in Suffolk for the reporting period, 1 July 2023 to 30 June 2024.

Victims by Gender
- (Blank) 3%
- Male 51%
- Female 46%

Victims by Ethnicity
- Black 2%
- Unknown 50%
- White - North E... 47%

Victims by Repeat Indication (within last 2 Years)
- True 5%
- False 95%

Victim Age

(Blank)	0_17	18_29	30_39	40_49	50_59	60_69	70_79	80_89	90_99
12	34	125	153	131	125	92	87	64	9

The below charts provide an analysis of fraud suspects in Suffolk for the reporting period, 1 July 2023 to 30 June 2024.

Suspect by Gender
- Female 32%
- Male 66%

Suspect by Ethnicity
- Black 4%
- Unknown 31%
- White - Nort... 61%

Suspect by Repeat Indication (within last 2 Years)
- True 24%
- False 76%

Suspect Age

(Blank)	0_17	18_29	30_39	40_49	50_59	60_69	70_79	80_89
21	11	83	112	60	32	18	3	2

3. APPROACH TO FRAUD INVESTIGATIONS – ROLE OF THE FRAUD ASSESSMENT UNIT (FAU)

3.1. The Fraud Assessment Unit (FAU) was formed in December 2021 with the aim to streamline, simplify and arrange the response to improve the service we provide to victims, in addition to providing further clarity for front line officers on fraud offences.

3.2. The FAU has a fraud strategic plan and is managed by the Workflow Management Detective Chief Inspector (DCI). The overarching aims are to reduce harm, loss and minimise risk to victims of fraud, building workforce capability, conducting quality fraud investigations and working together to counter fraud.

3.3. The Team consists of a Detective Sergeant and three Detective Constables. All officers in the Fraud Unit enrol on a City of London Police Economic Crime Specialist Investigator Programme course (Note: this role was previously known as the Specialist Fraud Investigator course).

3.4. The key responsibilities of the FAU are:-

- Review of every fraud investigation in Suffolk within 24 hours.
- Review of every closed fraud within 48 hours of closure.
- Bespoke interview advice – suspect or victim.
- Bespoke investigative advice.
- Liaison with NFIB (National Fraud Intelligence Bureau) and Specialist Teams.

- Liaison with Serious Organised Crime (SOC) and the Eastern Region Special Operations Unit (ERSOU) and their Specialist Teams.
- Liaison with Trading Standards around bogus callers/rogue traders.
- Deliver the National Fraud Strategy

3.5.   The Constabulary Fraud Unit has set up a process whereby all fraud offences are routed via FAU to carry out an initial assessment. The Team review investigations in line with the Fraud Investigation Model (FIM) which has been developed to take account of the unique nature of fraud. It is intended that this model should bring about a structured and logical approach to the investigation of fraud by acknowledging that criminality, risk of harm and loss continues following reporting and during investigation and data gathering stage. The model considers the need to limit the period of harm and loss by stopping the fraudster at the earliest opportunity, placing an emphasis upon opportunities for early disruption and prevention with initial evidence gathering and data collection. The FAU also deliver training to departments including new officers to explain the fraud recording process, and how the Constabulary investigates fraud.

3.6.   There are many fraud offences recorded and then investigated within Suffolk that do not need a direct input from the Constabulary, and the FAU aim to help in identifying these instances prior to Athena (crime recording system) and provide advice to Officers on the Action Fraud referral mechanism and the 'Action Fraud – Call for Service' criteria that needs to be satisfied for an offence to be recorded on our systems.

3.7.   Potential 'money mules' (an individual who transfers illegally obtained money between different accounts, earning a commission for doing so) are identified by Suffolk Constabulary through banking enquiries completed within the FAU. If the person has no previous offending history, the criminal matter is dealt with by way of a 'cease and desist' notice. Relevant advice and guidance are given around crime prevention. Vulnerabilities are recorded and directed towards the Multi-Agency Safeguarding Hub (MASH). Cease and desist notices are a form of disruption recognised by the NFIB.

4.   APPROACH TO CYBER ENABLED FRAUD AND SERIOUS ORGANISED CRIME

4.1.   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.

4.2.   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, through the new NFIB related processes, is likely to increase intelligence submissions relating to online fraud and provide opportunities for early preventative actions.

4.3.   The Constabulary works in partnership with other agencies to combat OCGs and tackle fraud as a secondary crime type. Agencies have included the Department for Work & Pensions (DWP) and His Majesty's Revenue and Customs (HMRC), causing large scale disruption of fraudulent activity.

4.4.   Lead Responsible Officers (LRO) for OCGs in Suffolk Constabulary have been briefed on recognised tactics under four key areas of:-

- Prevent
- Pursue
- Protect

- Prepare

4.5. These officers 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.

4.6. 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.

4.7. The Cyber Specialist Capability Team has two Cyber Security Adviser's embedded to assist specifically with provision of information to victims of Cyber Fraud. This can involve businesses and individuals. The Team has also developed a system that will produce bespoke written advice for victims of all Cyber Fraud, which provides support and guidance to prevent becoming repeat victims of crime.

4.8. The Joint Suffolk and Norfolk Constabularies Specialist Crime and Intelligence Directorate has resources that contribute to tackling Fraud. The Team provides a reactive response and undertake work to prevent and protect the public against Cyber dependant Fraud.

5. ADDITIONAL POLICING CAPABILITY

5.1. The Constabulary also has a pool of Detectives based within Criminal Investigation Departments, who have enrolled on a foundation course element of the Fraud Investigators course delivered by the City of London Fraud Academy.

5.2. Suffolk Constabulary also has senior officers who are accredited as Fraud Managers having attended the Counter Fraud Managers course hosted by the City of London Police.

5.3. The Intelligence Directorate has 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. The number of staff that have been trained is increasing.

5.4. In February 2023 Suffolk Constabulary successfully obtained central funding to work in collaboration with the National Crime Agency (NCA) National Economic Crime Centre, and the City of London police on a national enforcement campaign known as Operation Henhouse. Suffolk Constabulary was able to use the funding to pursue outstanding fraud suspects and advance existing fraud investigations. Operation Henhouse was used in February 2024, and in that time there were 7 arrests, 12 voluntarily attended interviews, and the issuing of a cease-and-desist notice.

5.5. Numerous enquiries were undertaken to ascertain the location of suspects and progress cases. This also included several enquiries for a SOC case, Operation Fisk, where specialist skills from the FAU were utilised to progress the investigation.

6. SUPPORTING VICTIMS

6.1. Fraud investigations are recorded in the same way as all other investigations utilising an investigation plan, to ensure compliance with the Victim's Code of Practice (VCOP), apply to all Suffolk fraud.

6.2. Suffolk Constabulary's Fraud Assessment Unit (FAU) is engaged with the National Economic Crime Victim Care Unit (NECVCU), who are a Team within the National Fraud Intelligence Bureau (NFIB).

6.3. There is a process in place for level 1 and 2 victims to receive support from the NECVCU. If the NECVCU have concerns they refer into the Constabulary to the Fraud Assessment Unit for either a visit by an officer or contact from the FAU. All reports to Action Fraud for Suffolk residents will lead to contact from the NECVCU.

6.4. 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.

6.5. Level 1 and 2 victims are matters, where there is no identified vulnerability, low value loss etc. Matters assessed as higher than level 1 or 2 are sent back to Suffolk via the vault by the National Fraud Investigation Bureau, which is then assessed and pursued through the FAU.

6.6. 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.

6.7. 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.

6.8. When relevant, Constabulary staff complete vulnerable person referrals for multi-agency assessment. These are processed by the Multi-Agency Safeguarding Hub (MASH) who can make determinations about how best to safeguard a potentially vulnerable person, sharing information with other partner agencies where relevant to best safeguard that person.

6.9. 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.

7. POLICING IMPROVEMENT

7.1. The City of London's National Coordinator's Office (NCO) 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.

7.2. 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.*

7.3. The 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 Improvement Panel.

7.4. In May 2023, the Home Office published the national Fraud Strategy. The strategy focusses on three key actions: -

- *Pursue fraudsters*, *Block fraudsters* and *Empower the public*.

7.5. The current force Fraud Policy (2022) and Fraud Strategy will be reviewed to ensure that they align to the national strategy.

7.6. The pursue element comes under general business as the Constabulary will pursue named suspects on fraud investigations within Suffolk. In terms of block fraudsters and empower the public, the Constabulary is in the process of seeking to secure funding for a prevent role to assist with engagement and prevention visits to the public.

7.7. The National Coordinators Office (NCO) at the City of London Police continues to develop its engagement strategy and support for forces in improving their response to fraud. His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) is highly likely to commence a Police Effectiveness, Efficiency and Legitimacy (PEEL) inspection of fraud in 2025/26 and is expected to engage with the NCO regarding the proposed framework.

7.8 The NCO developed a mechanism which enables them to objectively assess forces against a number of factors to better understand where additional force level support is required, and thematic areas with opportunities for further improvement nationally.

7.9 Each force provided the NCO with a self-assessment against the good practice recommendations identified through our engagement work. This was supplemented with elements of national performance data to produce a capability assessment which has allowed us to make some comparisons between forces. Suffolk has been assessed as '**stronger**', which is noted as "performing well with some opportunities for increased focus." This is the second highest rating on their scale of 'strongest', 'stronger', 'average', 'weaker' and 'weakest'.

7.10 The FAU is gaining access to the Agency & Partner Management Information System (APMIS) database to record disruptions.

## 8.	PARTNERSHIP WORKING

8.1. 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.

8.2. Part of the Constabulary engagement in the regional meetings is to undertake a quarterly assessment of our position against our force and regional level strategy and action plan, using the model of the 4 P's – pursue, protect, prevent, and prepare.

8.3. 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.

8.4. 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).

## 9.	ANTICIPATED DVELOPMENTS FOR THE NEXT REPORTING PERIOD

9.1. A new 'Fraud and Economic Crime App' is now available, designed and developed by the City of London Police Fraud Operations Team and the Economic and Cyber Crime Academy.

OFFICIAL

9.2.   The APP will aid all frontline officers and staff not ordinarily exposed to fraud and economic crime, ensuring they can give the very best response when serving the public and preventing repeat victimisation. It provides a quick-access a 'go-to' guide on topics such as:-

- When and how to report a fraud or economic crime;
- Legislation: a quick reference to the right legislation to use at the right time;
- Providing the best advice for protecting the public from fraud;
- Victim care: principles to apply and managing ongoing support; and
- How to deal with cash seizures and early considerations during an investigation.

9.3.   At present the Constabulary ICT governance and support is not in place to launch the Fraud APP. There is a project in train that will provide this and, once in place, the Fraud App will be made available to all staff.

9.4.   The intention to replace Action Fraud with a new Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) remains ongoing, with no significant update known at the time of reporting. Suffolk Constabulary was a pilot force for FCCRAS, however the Suffolk ICT network did not meet a security assessment which was a problem shared by other forces included in the pilot. Further work is being completed to make the Suffolk network compatible.

9.5.   The Fraud Assessment Unit has regular and strong links with Suffolk Trading Standards, and work is underway to recruit two Fraud Protect and Prevent Officers within these teams . One will be Police Staff within the Suffolk Constabulary Fraud Assessment Unit, funded through the policing of the element of the council tax and the other will also be a new post within Trading Standards. The two postholders will work in partnership to protect and prevent people becoming victims of fraud. The Police and Crime Commissioner successfully secured funding from the Suffolk Public Sector Leaders group of £150k over three years to fund the trading standards post, and provide equipment for both postholders to prevent personal fraud across Suffolk.

9.6.   The two partner agencies are also in the process of establishing a MAAF - Multi-Agencies Against Fraud - following an example in Kent, which is Trading Standards led, and would be where the Protect Officers would fit in.

9.7.   The police fraud protect post is close to being advertised to enable recruitment of the right candidate. Trading Standards are in a similar position with their recruitment.

10.   FINANCIAL IMPLICATIONS

10.1.   To support improvement in many of the areas outlined, continued investment in training and People to fulfil key functions will be required.

11.   OTHER IMPLICATIONS AND RISKS

11.1.   The data presented shows a continued increase in reported cases of fraud. This gives us scope to assess how best to address the rising demand, including prevention.

11.2.   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 and nationally is unknown.

11.3.   The nature of fraud has changed over time and continues to develop, and those committing fraud on a larger scale seek new ways of offending, particularly online.

11.4.   Suffolk Constabulary has a small number of dedicated fraud staff by comparison to other police forces within the Eastern Region.

11.5.   The Constabulary has seen little improvement in the ability to demonstrate proactive 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.

12.   OPPORTUNITIES

12.1.   There are opportunities that are starting to be realised 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 and a reduction in duplication with more complete assessments of fraud through information sharing.

12.2.   The Eastern Region Specialist Operations Unit are investing in additional capabilities within the area of economic crime.

13.   CHIEF OFFICER CONCLUSION

13.1.   There are upward national and local trends where fraud offending and recording of crime is concerned. The national framework for reporting of crime is well established and there is stability in local response to victims and investigations.

13.2.   The development of additional national strategy has led to a period of review and improvement within the Constabulary, and performance remains stable albeit challenging due to the nature of cyber enabled fraud offences and the offender profiles.

13.3.   Local approaches continue to focus on prevention and reduction initiatives with an emphasis on protecting those most vulnerable to fraud offending. The Constabulary will continue to monitor best practice and national change, and will react accordingly to maintain delivery standards.