

# TACKLING FRAUD IN THE UK

Successes, Shortfalls and  
Strategies for Improvement



west midlands  
police and crime  
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BIRMINGHAM CITY  
University

## Foreword

Fraud affects everyone, from individuals to businesses, organisations and Governments. We all will either have experience of or know people who have been affected by fraud. In fact, fraud costs the UK economy £193 billion per annum according to Experian, however, the City of London Police, who are the national lead police force estimated the cost of fraud to be around £2.2 billion in 2018/19. According to the Crime Survey for England and Wales, it is estimated 3.8million fraud offences were committed to the year June 2019 yet Action Fraud, the national reporting centre, recorded just shy of 750,000.

It is imperative the UK Government and policing prioritise resources to tackle fraud. The threat, risk and harm is significant, especially on the most vulnerable who are easy targets for fraudsters.

The current system is not fit for purpose with the national reporting system of Action Fraud and the National Fraud Intelligence Bureau being under funded and disjointed from national, regional and local policing bodies. The accountability of the lead police force, City of London Police, needs an overhaul to ensure effective national democratic accountability, which involves Police and Crime Commissioners. Local police forces need to consider how the local infrastructure is supporting the policing response. Victims of fraud are often frustrated and angered at the lack of information and support they receive. They are told that they cannot report fraud to their local police force but are required to report to Action Fraud and then in some cases never hear back, they are angered that vulnerable people are let down by the system that is supposed to protect them.

I have been particularly concerned about lack of accountability and a joined up policing response to tackle the scourge of fraud. The current system needs to change in three key areas: governance, policing response and support for victims. That's why I hosted a national fraud summit in Birmingham in February 2020,

bringing together police forces, national agencies and private sector partners to develop solutions and support the national change required.

The policing response is one element in the fight against fraud and we need the private sector and regulatory agencies to play their part. We need Government to make the necessary investment and develop a robust and accountable system that the public can have confidence in.

The evidence base for the most effective intervention is lacking, therefore it is vital that funding is identified to support research and develop best practice that law enforcement agencies and partners can utilise to support tackling fraud.

I am grateful to Birmingham City University for supporting the summit and pulling together this critical report which sets out clear recommendations for national, regional and local agencies. These recommendations need to be implemented in full and to ensure that vulnerable victims of fraud are protected.

The fraudsters are inflicting misery on millions, that has to end. We need to get tough on the criminals preying on the vulnerable.



**Waheed Saleem**  
**Deputy Police**  
**and Crime**  
**Commissioner**



## Introduction

In February 2020 the National Fraud Summit was held in Birmingham. Attending were representatives from across the UK who work within the sphere of tackling fraud. The delegates came from a variety of backgrounds; however, the predominant field was policing (50%), followed by professional service firms (12%). The remainder were split across universities, local authorities, professional bodies and Trading Standards. See Appendices 1 and 2 for full details.

Before the day delegates were invited to send comments on key areas of concern in 3 areas: Governance; Policing; and Victim Support. During the Summit delegates also participated in a discussion in one of these areas (see Appendices 3, 4 and 5 respectively). This report summarises the outcomes from those discussions and proposes recommendations to address areas of concern.

## Background

The number of reported fraud offences cited in official statistics incorporates fraud offences collated by the National Fraud Intelligence Bureau (NFIB) from three reporting bodies: Action Fraud, Cifas and UK Finance. In the year ending June 2019, 740,845 offences of fraud were reported. However, the Crime Survey for England and Wales (CSEW) estimated that 3,863,000 fraud offences were committed against adults in England and Wales in the year ending June 2019, suggesting that fewer than 15% of fraud offences occurring during this period were officially reported and recorded.

The number of successful prosecutions of offenders for fraud has dropped from a high of 15,500 in 2010, to under 9,000 in 2019, according to Ministry of Justice data. These 9,000 prosecutions represent just a fraction (3%) of the total fraud reported nationally. In addition, separate figures, from all 43 police forces, show the proportion of fraud cases that resulted in a conviction fell by a quarter in just a year, from 21.9 per cent in 2016/17 to 15.9 per cent in 2017/18. In the West Midlands, figures cited at the recent Fraud Forum suggest that of the 39,000 cases which occurred in the region over the course of a year, just 8% were referred to enforcement, and fewer than 50 cases resulted in prosecutions.

It is not just private individuals who are impacted by fraud: businesses and organisations can be the target of fraud themselves, either from within their own ranks or from those targeting businesses for criminal gain. According to 'The Financial Cost of Fraud 2019'<sup>1</sup>, published by Crowe and Portsmouth University's Centre for Counter Fraud Studies, an organisation can expect to lose 3%- 6% due to fraud, but this can be as high as 10%. Over the past 10 years, average losses have increased by 56.5%. There is also the unseen cost of fraud to organisations, which comprises the investigation, insurance premium increases, reputational damage etc. Button et al (2019) identified that consequential losses for frauds under £25K run at 63% of the direct loss, and that the average spend is 0.62% of turnover for counter fraud measures, with reputational costs being 100 times higher than the direct loss.

<sup>1</sup> NB: CSEW estimates cover a broad range of fraud offences, including attempts, involving a loss and incidents not reported to the authorities.

## Background



The 'International Framework: Good Governance in the Public Sector' defines governance as 'the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved'. While there is no universally accepted definition of governance, this definition is echoed by the G20/OECD and the Financial Reporting Council and many other respected organisations and researchers. Governance failures are all too frequent in the UK, and these are not limited to the private sector. Criticism has been aimed at the government for poor decisions made at a senior level within the governance framework. The impact of such failures is far-reaching and sometimes devastating.

In the case of Carillion, contracts were awarded by the decision making body within the Government, despite profit warnings being issued by Carillion. Its ultimate collapse impacted multiple public sector building projects, causing redundancies within Carillion and its supply chain. For example, a major hospital development in the West Midlands set to serve ¾ million residents, has been delayed by 3 years due to the collapse. It can be argued that the contract should never have been awarded to a struggling organisation, and therefore the delay is due to poor decision making within the governance framework. There have also been tragic cases in the UK of failures in child protection, and in his published speech to the Institute of Public Policy Research, Michael Gove stated 'transparency when adults get it wrong helps us get it right for children in the future'; a clear link to the principles of governance focused on transparency, accountability and strategic decision making.

Currently, transparency, accountability and responsibility are either lacking in places or are too complex to create a robust governance structure which focuses on the strategic vision for tackling fraud. As one fraud forum attendee commented:

"Governance over fraud should be simplified and clarified as much as possible to allow for victims of fraud and law enforcement and other investigative agencies to easily understand what sits where and why."

In 2020 we have witnessed a global emergency – the Coronavirus pandemic, otherwise known as COVID-19. Europol's 'Pandemic Profiteering' report, published in March 2020, reviewed the criminal response to the COVID-19 pandemic. In the opening to the report, Catherine De Bolle, Chief Executive of Europol, stated that criminals are notoriously adaptable and they have 'quickly seized the opportunities to exploit the crisis by adapting their modes of operation or developing new criminal activities'. The report highlights that the criminal activities are across all types, including cybercrime and counterfeit and substandard goods. In late April 2020 SCAMWATCH provided examples of frauds that had been seen during the pandemic which included government and organisation impersonation, superannuation fraud targeting those fearful of their financial position due to COVID-19, fake on-line shopping websites and supplier identity fraud against businesses. All of these fraud types existed prior to COVID-19; however the criminals are now capitalising on the fears and anxieties of members of the public to further their own criminal exploits.

In the following section, key themes which emerged across the different strands are discussed.

### **The Issue of Funding... (The Elephant in the Room)**

Across the groups and in all discussion, the key issue of funding came up again and again. There was a prevalent notion that more visible crimes which are - perhaps incorrectly - deemed to be a higher priority (such as knife crime) have taken resources away from economic crime. It was noted that despite having seen a 55% rise in fraud-related offences, funding levels have remained the same in recent years. The feeling was that PCCs and the Home Office have surges of interest but that there is no consistency with regards to focus or prioritisation. It was suggested that greater transparency is needed with regards to where funding is going. PCCs and the MoJ should be held to account with regards to related spending and outcomes should also be measured, monitored and published, to enable the cost-effectiveness of different strategies, programmes and schemes to be evaluated.

### **A Complicated Landscape of Support**

It was noted throughout that provisions for victims are varied, with a complicated landscape of different approaches and mechanisms for supporting those affected by fraud. This is reflective of the lack of the victim's voice within the governance structures that currently exist. There were varied responses to the question of whether responses to fraud should be centralised or localised; the general consensus seemed to be that intelligence should be centralised but victim support should be localised. In addition, the local referral units for victims are often the central point of contact; and that what is available locally is crucial for victim experience.

It was also noted that local response and service delivery was better in some areas than others, largely as a result of funding issues. This, it was suggested, creates somewhat of a 'postcode

lottery' in terms of support provided to victims.

### **A Postcode Lottery**

This postcode lottery was a consistent theme in its own right, and there was consensus across the board that we should be providing a more consistent standard of victim care.

More consistent strategies – both locally and nationally – are needed in order to effectively tackle fraud, with better co-ordination and more even funding distribution (in response to prevalence and need). Greater signposting towards services for victims is also needed. This was eloquently put by one delegate:

**“There needs to be a measure of local and national priority. A lot of the volume of crime goes to police officers who are unequipped to deal with the matter coherently. Regionally there seems to be a lack of capacity to deal with crime. However, some regions do deal with fraud better than others. Fraud needs to be moved away from regions and move to a more co-ordinated national effort, as regional forces are okay for some crime types but cannot deal with all fraud coherently...”**

### **Accountability**

Through all of the discussions held there was a frustration amongst the delegates of the lack of accountability within the governance framework currently in place. This extended from Ministerial Economic Crime Strategic and Delivery Boards, the connected governance structures and into the working level governance. In particular, they were critical of Action Fraud, with some calling for it to be closed and others providing examples of where reported cases had been lost in the system, resulting in victims not receiving the support they need.

## Summary of Key Issues



This was underpinned by the lack of transparency over the governance structures in place and apparent lack of strategic focus being taken with a national and global perspective. This was evident when all but a handful of delegates in the governance focus group had never seen the current government structure being used.

There was no doubt among the delegates that the governance structures and accountability within them needs to change in order to improve how fraud is tackled in the UK.

### **The Need for a Co-ordinated Approach**

It was generally agreed that a co-ordinated approach is needed in order to effectively tackle fraud and to facilitate quick dissemination of pertinent information/emerging patterns and threats, and diffusion and permeation of good practice. Such an approach should be informed by a range of different perspectives, and mechanisms should be put in place to facilitate the sharing of information and data. Some clear and effective links and networks already established were referred to, for example between forces and victim support services, as well as with public health providers. One model of good practice in this respect has been provided in Leicestershire, with the formation of a multi-agency fraud and safeguarding hub and a similar scheme was reported for West Yorkshire.

The ideal was seen to be a public health approach to tackling fraud, as highlighted by one delegate:

**“Fraud should be seen as an adult safeguarding issue and there should be a holistic response from partners rather than from the police and trading standards alone.”**

This should be reflected not only within the governance but also where investigators and victim support organisations work with GPs, social care, the third party sector and other organisations in identifying economic abuse, in

providing interventions and specialist support. Activities that could be employed under such an approach include cross-agency campaigns, engagement strategies and training programmes.

### **The Need to Develop the Evidence Base**

Reference was made throughout to a lack of reliable data and weaknesses in intelligence for informing strategic priorities and developing community safety partnerships:

**“Forces are expected to be intelligence-led, but no-one is pulling the information from Action Fraud, CIFAS, banks, etc. to provide us with a [more complete] picture of Fraud..”**

It was suggested that it would be helpful to have a central database that could be accessed by both the police and (approved) external partners, including those working in the financial sector. Whether or not this is feasible is debatable, but certainly forces having access to the Action Fraud database would be a good starting point in providing better access to intelligence.

More broadly, there has also been little academic research into fraud relative to other types of crimes, and the research that has been done is dispersed across disciplines and can be hard to locate and access.

### **Changing Perceptions and Narratives Around Fraud**

**“We need to change the narrative that is associated to fraud. It is not a white collar crime, it has devastating consequences to individuals, families and communities...”**

(comment made during the policing focus group)

What emerged from many of the discussions that took place during the Summit was the need to change the way that we talk about fraud, both as professionals tasked with dealing with fraud, but more so as a society as a whole. As many noted; we create a perception – both internally and externally – that ‘fraud doesn’t matter’



which ensures that it places lower down on the priority lists of the public, practitioners and policy makers than more visible crimes such as domestic violence or child sexual exploitation. Raising the profile of fraud would help ensure that it features higher in local and national priorities.

It was noted that there is not enough coverage of fraud/fraud cases in the public arena. We need to speak about fraud more openly and more frankly. A national campaign is needed, which makes reference to real figures on fraud and real-life cases and consequences. It was also suggested that greater publicity with regards to the financial penalties for convicted fraudsters could be used as a deterrent for involvement in fraudulent activities.

We need, though, to establish how effective such campaigns are likely to be before rolling them out, otherwise we may lose opportunities for impact. Independent evaluation of such campaigns will be important, in determining whether efforts and resources are being utilised effectively. It is suggested that feedback is needed from relevant parties – such as members of the public, victims and convicted offenders – with regards to how effective such messages are likely to be in reducing and preventing fraud.

### **The Dynamic and Evolving Nature of Fraud**

A key failing of both previous and current strategies for tackling fraud, highlighted in the focus group discussions, was the tendency to take a reactive rather than proactive approach. There is recognition that fraud and fraudsters are constantly evolving, utilising opportunities afforded by changing social and political climates to their advantage in order to enhance their methods and increase their chances of evading detection.

One very clear example of this has been in relation to the on-going COVID-19 epidemic.

Online activity increased exponentially during the enforced lockdown that ensued, and right from the beginning of the outbreak it was recognised that fraud would increase. Good practice with regards to speed and nature of the response to this emerging threat, as well as potential strategies that might effectively be employed in such circumstances, are discussed in Appendix 7.

We need to focus on developing fast and effective responses to fraud: we know that criminals change quicker than we can, and that we are struggling to keep up. The only way we can respond effectively, in a timely manner, is to be better prepared. This will involve processes of horizon-scanning, and contingency planning so that this can be put in place as and when needed to deliver effective intervention and support.

We also need to find ways of more effectively sharing information on new and emerging fraud threats – access to real-time information is likely to help responders tackle fraud more effectively.



## Recommendations

### **Recommendation 1: Co-ordinated oversight of national and local responses to fraud**

The National Fraud Forum should continue to meet quarterly to monitor, review and scrutinise the implementation process and progress made in relation to the recommendations set out in this report.

Priorities and timeframes for implementation of the recommendations should be identified, monitored, and revised where appropriate in response to emerging data.

### **Recommendation 2: Development and maintenance of a multi-agency partnership to collate and analyse data regarding fraud response and provisions**

A multi-agency partnership should be developed, to harness the expertise, experience and knowledge that these different parties represent, and to use this in generating and maintaining delivery of common goals identified throughout this report.

Such a partnership would enable a range of perspectives to be taken into account when evaluating and developing policy and practice in relation to fraud.

### **Recommendation 3: Simplification, transparency and accountability within fraud governance**

The governance structure needs to be simplified and a 4 tier approach introduced.

#### **International**

Including agreements between countries on how to co-ordinate the investigation and prosecution of fraud committed across boundaries. The UK should be a member of this governance board.

#### **National**

With a UK strategic focus which considers four key strands: victims voice (organisations and private individuals); fraud landscape within the UK and how this relates to the global picture; investigation and prosecution both criminal and civil; and education and awareness of fraud both for members of the public but also for those involved in the working to combat fraud.

#### **Regional**

Again a strategic focused board considering all four elements are for tier two, but now on a regional level.

#### **Local**

With the introduction of a local Fraud Board pulling together local representation on the fraud agenda. Again covering the same four areas.

There should also be cross representation within these 4 tiers which will aid communication flow and help ensure messages are disseminated up and down through the structure.



Accountability needs to be a key thread throughout, with areas such as Action Fraud being required to provide information on their performance and visible action being taken to address any shortcomings. It is the recommendation of this report that Action Fraud is brought into the policing governance framework by bringing operations into policing delivery. It was noted at the Symposium that there would be cost to this, and therefore the Home Office needs to factor this into its forthcoming plans.

To implement this the current Ministerial Strategic Board could remain in place as the national tier. However consideration needs to be given to its current membership. A better structure would be to have several advisory committees and the information from these would be used to guide strategic decisions being made, similar to that of Safeguarding (see appendix 8).

**Recommendation 4: Fraud to be prioritised on both local and national agendas, and to be given specific focus in the Strategic Policing Requirement (SPR)**

We need to (re)invigorate interest in fraud and awareness of the extent of the problem, as well as the consequences of fraud, both internally (within the police and partner organisations), and externally (in the general public). To do this we need to change the narrative around fraud; whilst all of us have our part to play in this, a key starting point would be for fraud to be given specific focus in the Strategic Policing Requirement (SPR)<sup>2</sup>.

**Recommendation 5: Greater accountability with regards to provision, investigation and support**

What will also help in terms of raising fraud up social and political agendas is greater accountability with regards to where and how money is being spent, and in how well different strategies and approaches are working. Scrutiny over the quality of the data needs to be strengthened and continuous auditing

introduced, in particular independent review of case processing and procedural adherence. This could focus on key attrition points, such as the allocation of 'no-crime' classifications and the stagnation of cases at the point of prosecution, which could help highlight failings and identify ways of increasing conviction rates. It is acknowledged that complexities regarding investigation and prosecution would need to be taken into account in such processes; for this reason it is suggested that a case review panel be established, comprising expert practitioners and researchers.

Accurate figures on prevalence and prosecution rates can then be published, with regional variations being addressed where appropriate.<sup>3</sup> Performance measures should be introduced to monitor provision delivery with regards to the investigation and management of fraud cases, victim support, and crime reduction. Reports should be provided into the governance boards identified above for review and challenge and to inform strategic decisions over tackling fraud.

**Recommendation 6: A drive towards identifying, harnessing and sharing best practice**

A range of examples of best practice were highlighted throughout the discussions which took place during the National Fraud Forum. However, these are not - at present - promoted to any real degree, and for effective models of practice to be adopted and replicated awareness needs to be drawn towards the success stories that are out there

It is hoped that the present report will help with this to some extent; however, we need to consider the best channels for capturing, promoting, and celebrating good practice.

Forums such as the one which provided the basis for report are effective for such purposes, which further supports Recommendation 1 - that such events be held on a regular basis.

<sup>2</sup> The Strategic Policing Requirement (SPR) sets out the priorities which PCCs across the country need to pay attention to in their Police and Crime Plans.

<sup>3</sup> Consideration should be given to providing limited access for the ROCUs and police forces to the national database to gather reports and information. This would remove the reliance on central data teams in providing reports and would enable the ROCUs and Police Forces to obtain reports which are relevant to their local needs.

## Recommendations

It might be worth exploring the possibility of developing an associated online forum, to facilitate broader dissemination of reports and materials from the meetings of the forum. Feed-through from both regional boards and local provision could also be encouraged, to open up broader discussions and guide future activities.

### **Recommendation 7: Following good practice through the implementation of 'quick wins'**

A number of methods already in place with (tentative) evidence of success have been provided here. It is suggested that these be adopted and/or scaled up where possible, to achieve quick wins and deliver fast results where and as appropriate.

For example: the Economic Crime Victim Care Unit run by the City of London Police currently provides a service for victims in a few force areas; this could be rolled out more extensively, to facilitate more equivalent and comparable provision across the board and help reduce the impact of the identified 'postcode lottery'.

### **Recommendation 8: Developing the Evidence Base**

Our understanding of fraud and the efficacy of responses and support provision must be underpinned by a sustained academic research programme. We need to develop a more detailed evidence base as to 'what works'.

In order to achieve this, organisations must be willing to share data with registered and approved users or institutions. Mechanisms for supporting this, including any vetting requirements or user agreements, should be developed as a priority.

In order to facilitate development of an evidence base;

- a) A database of examples of scams/frauds, should be developed and shared
- b) Research should explore the characteristics of different sub-types of fraud, including typical victim and offender profiles for each
- c) Victim experiences should be captured and

drawn upon

- d) Research should be conducted with the general public, in order to provide realistic estimates of the prevalence of fraud, as well as feedback on efficacy of schemes to raise awareness and prevention strategies.

In addition<sup>4</sup>:

- i) Rapid evidence assessments should be conducted and circulated in response to emerging and developing situations (such as the current COVID-19 pandemic).
- ii) Strategies for public engagement and awareness raising should be evaluated
- iii) The effectiveness of current and emerging schemes for tackling fraud or supporting victims should be established, in order to determine whether they are achieving what they set out to do.

Different academic perspectives should be sought; for example business, psychology, law, sociology, computing and media, to name a mere few), with appropriate representation and contributions from each.

It is proposed that a centre for fraud-related research be established at Birmingham City University to co-ordinate research activity in the area.

### **Recommendation 9: Review of current policy and practice**

It became apparent during the course of discussion that an understanding of the various different policies and practices with regards to the management of fraud and the support of fraud victims is lacking. It is suggested that a detailed review should be published, examining current policies as they apply a) at different levels (local, regional and national), and b) to different sectors. Alongside these, details of the schemes or programmes that are currently in place should be published, in a manner that makes them easy for those to whom they apply to access.

<sup>4</sup> For i) and ii) a set of common measures is needed, to enable relative comparisons of the effectiveness of different interventions, educational strategies and awareness campaigns to be made.



Related to this, and to address the issues of transparency discussed previously, details of funding allocations to for different investigative and support activities should be made publicly accessible, and in the interests of fairness and integrity evaluation requirements should be introduced and attached to funding allocated for tackling fraud. These should directly assess value and return for investment.

Pilots involving alternative schemes, and an assessment of how these work relative to current systems, could also be beneficial.

### **Recommendation 10: A review of the legislation around fraud**

Across the focus groups there were suggestions that current legislation (and associated powers) may be lacking. To this end it is suggested that a review of the legislation around fraud, of its implementation, and of factors that impede case progression and successful conviction, could be of value.

Useful examples and a template for such a review might be drawn from the current review of Hate Crime legislation being conducted by the Law Commission

(see: <http://www.lawcom.gov.uk/project/hate-crime/> ).

### **Recommendation 11: Raising Awareness and Educating the Public**

Education and awareness-raising strategies around fraud were highly criticised, despite it being recognised that these are key tactics in disrupting and preventing fraud.

An education and awareness program needs to be implemented which includes:

- Easy to access and use guides for victims (including a directory of support providers)
- National public awareness and education campaigns (the Barclays Fraud Awareness advert during COVID-19 is proposed to be a good example of an effective public-targeted campaign)

- Local public awareness campaigns, supported and tied to national campaigns but which are responsive to local needs (e.g. targeting local vulnerable groups). This could include visiting care homes, schools, universities, and clubs such as the Scouts, Women's Institute etc.
- Celebration of success, for example; through communication of 'wins' (e.g. removal of fraudulent websites, successful criminal prosecutions, bank accounts seized and funds returned to victims).

### **Recommendation 12: Examination of current workload and resource distribution**

The recent Mackey Report was deemed to provide potentially valuable insights into how fraud cases might be better assigned in order to achieve better resolutions to cases - both those that are more localised in nature, and those on a larger scale.

The need to develop properly resourced fraud teams, based locally but with coordinated messaging and objectives, was noted by many. It is suggested that would constitute an achievable and appropriate aim for targeted efforts over the coming months and years.

It may be that, as some delegates indicated, ring-fencing of resources is needed. This is not a recommendation here per se, but a note is included that this is a possibility that those charged with allocating funding for tackling fraud should consider.

### **Recommendation 13: Increased training for management of fraud**

There was a recognition in all focus groups that training for those involved in the management of fraud was weak. Formal training needs to be developed and implemented for different role types and levels of involvement, based on a detailed training needs assessment. This should be from Ministerial level down through all of the governance structures, including police forces, victim support, and organisations involved in the management of fraud. Feedback from the focus groups indicated that more support in undertaking training, if this could be offered, would be heartily welcomed.



## Recommendations

In particular, there is a clear need for increased training in the use of intelligence, to ensure that existing tools and resources are used more effectively in enhancing performance. This is a clear example of a relatively quick and easy win: there are many resources that are readily available, but which – as noted by a number of attendees – are not being used effectively.

Forces are urged to assess whether they are currently meeting the training needs of their staff, and to consider whether it might be economically viable and perhaps beneficial to allocate more resources towards training. It may seem like this would require considerable outlay, but we would suggest that increased training could pay dividends with regards to enhanced outcomes – for the force itself and for the public that it serves.

### **Recommendation 14: Building capacity through partnership development**

It is suggested that a key strategy moving forward should be the development of partnerships with agencies like the Fraud Advisory Panel, as well as with external organisations and academic providers, to build and enhance capacity with regards to tackling fraud. The Forum provides a good starting point for such endeavours; however, concerted efforts should be made both to formalise and support the development of partnership networks.

Universities could prove an invaluable resource in building capacity; for example – for research, for training, for public engagement work and in supporting the activities of practitioners.

It is also suggested that the potential value of utilising local organisations, such as the neighbourhood watch, GPs surgeries, WI groups and others, in developing and co-ordinating a public health orientated approach to reducing crime and supporting those vulnerable to victimisation be explored.

### **Recommendation 15: Development of adaptable plans for effective triage and efficient response to emerging and evolving threats**

The challenges presented by the recent COVID-19 pandemic and some of the effective and successful responses to these (see Appendix 7) highlight the potential value of horizon-scanning and contingency planning in order to enable effective triage and efficient responses in light of emerging and evolving fraud-related threats. It is suggested that plans be developed and put in place for the following:

- Task force formulation
- Rapid assessment and monitoring of pressing issues and increasing risks
- Fast dissemination of information regarding new/emerging forms of fraud and those facilitated by societal and/or environmental changes to practitioners
- The development of templates or 'action plans', that can be put into place quickly and with minimal effort
- Media/social media strategies for communicating essential information to the public
- Utilisation of local, third party providers to support activity and response.

On 20 February 2020, the Fraud Summit was held, led by the West Midlands Police and Crime Commissioner and the Association of Police and Crime Commissioners. The day was structured with 5 key presentations in the morning:

- Welcome address by Waheed Saleem, West Midlands Assistant Police and Crime Commissioner
- The National Picture by Commander Karen Baxter, NPCC Co-ordinator for Economic Crime, City of London Police
- The role of the National Economic Crime Unit in tackling Fraud, Ben Russell, Deputy Director of the NECC
- Tackling Economic Crime, Christine Farrow, Manager, Economic Crime – Account Abuse Lead, UK Finance
- The Victim's Perspective, Marilyn Baldwin OBE, Chief Executive of Think Jessica

Following the presentations the delegates broke into 3 focus groups:

1. Governance
2. Policing
3. Victim Services

The focus groups were facilitated discussions. Participants were asked to provide written agreement at the start of the day and reminded before the start of the focus group that their involvement was voluntary, all comments would be anonymised and they had the right to withdraw their participation at any time.

Prior to the day the WMPCC had structured a number of questions for each focus group and ~~~~ had been consulted and provided feedback on these. This ensured that the questions were pertinent to the profession but also had academic validity due to consulting with a known expert.

The focus groups were facilitated discussions which were managed by Birmingham City University's Business, law and Social Sciences Faculty. Facilitators were from within BCU and #####, and none had any involvement in devising

the questions being posed. This protected their independence and objectivity, as any bias from the creation of the questions would not be carried through into the focus group itself, and therefore the recorded views and opinions were truly of the participants. The facilitators were supported by note takers, who were students from BCU. Their notes were transcripts of the discussion that took place as far as possible, and have been reviewed by the authors of this report, who also attended all or most of the Fraud Summit.

Prior to the Fraud Summit, delegates had been asked a series of questions, and many had responded. These questions and responses were not seen by anyone involved in managing, facilitating or taking notes during the focus group. However these responses have been analysed subsequently and the findings from this have been included in the analysis and discussion as appropriate.

## Appendix 2 – Fraud Summit Structure



For any report to have credibility, we need to consider the profile of those who participated in the focus groups and the pre-Summit questionnaire.

| Organisation Type         | Focus Group |     | Pre-Summit Q |       |
|---------------------------|-------------|-----|--------------|-------|
|                           | Number      | %   | Number       | %     |
| Police                    | 38          | 55% | 36           | 63%   |
| Universities*             | 3           | 4%  | 1            | 2%    |
| Local/Greater Authorities | 2           | 3%  | 6            | 10.5% |
| Financial Services        | 5           | 7%  | 2            | 3.5%  |
| Professional Services     | 8           | 12% | 3            | 5%    |
| Trading Standards         | 3           | 4%  | 0            | 0     |
| CIFAS                     | 2           | 3%  | 2            | 3.5%  |
| Other – public sector     | 4           | 6%  | 0            | 0     |
| Other                     | 4           | 6%  | 2            | 3.5%  |
| Unknown                   |             |     | 5            | 9%    |
| <b>TOTAL</b>              | <b>69</b>   |     | <b>57</b>    |       |

\* Excluding Birmingham City University

Given the sponsors of the Fraud Summit it is not unexpected that over 50% of attendees were from the policing profession, however we must recognise this bias in the discussion of the focus group findings to ensure that this is balanced. What is interesting that professional services firms (predominantly accountancy and law firms) were the next best represented. The category of 'other – public services' included the Insolvency Service, CPS and housing of ex-offender organisations and there was one participant who attended as a private individual and is in the other / unknown category.

### **Overall function of governance boards**

When asked the focus group provided characteristics such as scrutiny and accountability (GFG1), ensuring the organisation acts ethically (GFG2) and ensuring laws are enforced (GFG3) as elements of good governance. These are all principles within the International Framework: Good Governance in the Public Sector. The focus group was also able to link these into the context of fraud for example the governing body should be seeking to ensure that the victims of fraud (stakeholders) should receive the same level of attention and support (outcomes) as victims of other crime (GFG4) in particular by scrutinising management information to ensure that the support provided is robust (GFG5).

### **Effectiveness of current governance arrangements**

#### **Structure**

When asked, the group were largely unaware of the existing governance arrangements surrounding fraud, only those who had direct involvement in the current structure understood what was already in place (GFG7) and had to describe this to the room. This is extremely telling of the effectiveness of the current arrangements, as there is no visibility and without this there is a lack of transparency and scrutiny.

**“There needs to be clear governance structure that is transparent and effectively scrutinised.” (PGR27)**

Once the current arrangements had been explained participants were able to offer criticisms more readily than positive observations. Many agreed that the governance structure does not reach down through the organisations involved (GFG9 and GFG17), in particular there is a disconnect between the governance structure and the varying arrangements in place across the multiple police forces and agencies in the UK (GFG16, GFG18, GFG27, GFG48).

**“There is no standardised governance at National, regional or local level, which means that there is a variety of governance across the country and not all will have an avenue to feed up or down. Standardising the governance will allow this to happen.” (PGR35)**

There were multiple suggestions and ideas in relation to a structure which would potentially improve governance over fraud.

**“There needs to be a single public-private governance model under the Economic Crime Plan/NCA with all key players represented. We need to stop the proliferation of governance and have a single National Fraud Strategy covering public and private actors.” (PGR26)**

**“It should be simplified and clarified as much as possible to allow for victims of fraud and law enforcement and other investigative agencies to easily understand what sits where and why. This will also assist with confirming where accountability and responsibility sits.” (PGR14)**

#### **Leadership**

**‘Fraud needs to be placed higher up the agenda on a National & Local level.’ (PGR30)**

The group discussed the leadership within the governance structure and there were criticisms of political differences, a lack of understanding of fraud (GFG11, GFG26) and Ministers not being actively involved in the governance of fraud (GFG12), all of which will inhibit the ambassadorial role of those involved in governance. This also has a ripple effect into the lower levels of governance as there is no clear ‘tone from the top’ on the importance of fraud.

**“Increase the priority of fraud. Ensuring police forces pick up fraud as a matter of urgency.” (PGR1)**

## Appendix 3 - Governance



The focus group also considered the leadership role at a more regional and local level and agreed that Police and Crime Commissioners should make fraud a strategic focus and priority (GFG39) within their area of responsibility. This would in turn help to develop a regional / local 'tone at the top' which would positively impact on the police and victim responses.

The group did recognise the pivotal role played by the National Economic Crime Centre (NECC) within the existing governance structure (GFG21).

### Accountability

The group questioned what information is available to hold the governance to account (GFG13, GFG34) and coupled with the lack of transparency highlighted above, this is an area for concern that needs to be addressed, as suggested by two participants in the pre-Summit questionnaire:

**"PCC's need to be provided with more information on the inputs, outputs and outcomes of Action Fraud and the NFIB and have a better mechanism for oversight and scrutiny."**  
(PGR15)

**"Better accountability and recording to ensure that data is accurate and services regulated to ensure they deliver on SLA's."**  
(PGR32)

### Management Information

Earlier in the day, Commander Karen Baxter, NPCC Coordinator for Economic Crime, City of London Police had stressed that information and data was key in the fraud arena. This sentiment was fully supported by the focus group, however the quality and timeliness of data (GFG51, GFG53 and PGR34) with some agencies not receiving much needed information (GFG25 and GFG58), was a common experience of those in the group. All of which results in an inability to make strategic decisions and take appropriate action due to

poor intelligence (GFG59):

Areas for improvement were highlighted by the pre-Summit questionnaire participants:

**"Fraud should be recorded accurately by each Police force and not classed as 'fraud non crime' or the matter classed as civil when it is clearly not."**  
(PGR20)

**"We also need better intelligence to understand the extent of fraud/cybercrime in our area."**  
(PGR27)

There was concern over the wider understanding of the terms 'economic crime' vs 'fraud' (GFG19) not only by the public but also by the various agencies and within the governance structure. There was a suggestion that these two areas should be categorised differently (GFG37), however the categorisation of frauds was subject of much debate. Criticisms around the 'other' category having the greatest number (GFG51 and GFG54), 'fraud non-crime' resulting in an inappropriate no policing response (GFG56) and the sheer complexity and breadth of fraud offences committed and the responses to these need to reflect this (GFG44), all calling to question the current categories being used. There was a suggestion of categorising fraud along victim lines (GFG47), rather than type, but overwhelmingly there was wide recognition of the benefit of creating more refined categories (GFG32 and GFG33), as this will lead to much more useable information not only by the agencies, but also by politicians and those involved in the governance (GFG46 and GFG47). With this better understanding, strategic decisions can be made at all levels of governance over fraud (GFG22 and GFG24), which will ultimately support the concepts of robust governance.

**"Greater visibility of the scale of the problem and greater visibility of performance - locally, regionally and nationally."**  
(PGR29)



## Parties Involved

The focus group considered who should be included in the governance of fraud, and while there was no suggestions that anyone should be removed from the existing structure there were some suggestions of additional parties who should be added, safeguarding bodies, Ofsted, Children's Services (G60), the Police and Crime Commissioners (G61) and also the Information Commissioner.

**"More engagement between private and public sector. More engagement with victims." (PGR5)**

Within The International Framework: Good Governance in the Public Sector there is the principle of 'Engaging stakeholders effectively, including individual citizens and service users' and while this is not aimed at pulling all stakeholders into the governance structure, it is a requirement to elicit views and input from the stakeholder groups. Therefore there is a question about the role of the individual stakeholder groups both within the current governance structure, but also who should be consulted. Earlier criticism was levied at the existing structure for being too complex and there is no clear transparency over the responsibilities of those already part of the structure (GFG15) and so it is important to ensure that any future governance structure allows for wide consultation and involvement, but with a simple central structure which is transparent and whose responsibilities are understood.

## Communication

With all the different stakeholders either directly involved in the governance, or needing to be consulted, and the lack of solid, reliable management information, communication within the governance structure naturally becomes more complex with many challenges. However the group agreed that they often do not have access to intelligence to support strategic decisions due to lack of communication (GFG65).

The recently published Mackay report has not been widely distributed to agencies and forces and therefore some have yet to receive, read and digest its content (GFG66). This report provides numerous recommendations on the governance of fraud and actions that can be taken within the existing structures to help improve how fraud is addressed. However, very few of the participants to a national Summit on Fraud had read this key communication which was published on 24 January 2020 and was directly relevant to the content of the day.

The group did agree on the importance of communication both up and down through the governance structure (GFG67) and an example of communication from the NECC on courier fraud was cited as a good example (GFG69). However, the NECC is only part of the governance structure, and in its lower extremities, which means the communication is not coming from the highest point, and the 'tone from the top' is diluted and the prioritising of fraud is undermined.

There was also recognition that earlier in the day there was positive news in the disruption of fraud as Commander Karen Baxter explained that 7,700 bank accounts 1,200 social media accounts and over 30,000 websites had been disrupted or taken down, however this good news and the level of achievement is rarely communicated.

## Improving Communication

The focus group was asked specifically for ideas as to how communication across the governance structure could be improved and 2 key areas were proposed:

- a. A single plan of communication for everyone to work with (GFG70)
- b. Build local infrastructure to support local communication GFG73

## Appendix 3 - Governance



There was also a focus on collaboration between stakeholders and partners to facilitate communication. For example:

**“Private sector and government should collaborate better; they need to share information on a regular basis. More education for small businesses, as they can’t afford a dedicated fraud team. More fraud resources should be available to the public.”**  
(PGR2)

**“Financial institutions to work together to share dissipation networks of reported fraud/scams rather than waiting on requests from Police.”**  
(PGR11)

**“As a matter of urgency there needs to be a more formalised collaboration between enforcement agencies to tackle fraud.”**  
(PGR13)

**“More coordinated approach to fraud across forces.”**  
(PGR22)

**“A more efficient connection with local forces and local victim services from national organisations.”**  
(PGR34)

### **Existing Models of Good Governance**

Given that the focus group unanimously agreed that the governance needed to be changed, they were asked what models of governance that exist elsewhere which could work for fraud. Some understood that the existing structure had been based on the governance put in place for tackling terrorism (GFG23) and that the existing structure was not necessarily relevant to policing (GFG10).

There were a number of suggestions which came forward not only during the focus group, but also from the pre-Summit questionnaire:

- Prevent
- Adult Safeguarding

- Children’s services
- Modern Slavery

In particular a participant in the pre-Summit questionnaire picked up on the consensus with the focus group, which suggests that the governance structure over adult safeguarding would be a suitable area to consider first:

**“Fraud should be seen as an adult safeguarding issue and there should be a holistic response from partners rather than from the police and trading standards alone.”**  
(PGR25)

### **International Fraud**

Fraud is not a local, regional or even national issue (GFG62 and GFG66). There was a practical appreciation here as to why global governance arrangements are need to be in place. Timescales for investigating fraud cross borders is key (GFG63), particularly as fraud committed as cyber-crime knows no geographical borders across the globe (GFG66), and that money obtained from fraud is not always held in a bank account (GFG68) which is traceable through the banking system. There was also a unanimous view that fraud should always be compensated back to the victims as much as possible, and percentage of what is recovered communicated (GFG67).

Concerns were expressed in relation to the communication and interaction with the EU going forward (GFG64), but participants were also unsure what the governance arrangements currently are or what is being proposed post BREXIT (GFG64) and therefore the new governance arrangements need to be communicated across the UK (GFG65).



There was general consensus that there needs to be an international strategy on fraud and this would make a 4th tier in relation to governance, which the UK should be a member of. This tier of governance and international strategy needs to support networking and sharing of information across borders, and should facilitate holding to account the global companies who are facilitating fraud through their services.

**“Fraudsters and launderers are not bound by geography in the same way drug dealers are.... We need a central team that can investigate national and international fraud...”**  
**(PGR7)**

**“Should cyber-enabled fraud be dealt with nationally, with local police forces in a supportive role?”**  
**(PGR9)**

### **Lobbying for Change**

At the end of the focus group, participants asked what they could do to help improvements they have discussed be implemented. There were 3 key possibilities

- All Police and Crime Commissioners should be stating that fraud is a priority, which then gives senior commitment at a local and regional level to tackling fraud.
- Fraud should be in the Strategic Policing Requirement as a national threat, demonstrating national commitment to tackling fraud.
- Politician’s needs to be actively involved in the fraud agenda. COVID-19 has raised the profile of fraud, but the long term impact of this is unknown.

## Appendix 4 – Policing Response

### Resources and Capacity for Tackling Fraud

The group was unanimous in their opinion that the police lack capability to tackle fraud. There was full agreement that the police need to tackle fraud more effectively at both a regional and national level – that arresting their way out of the problem is not going to work (PFG58).

It was observed that – related to a lack of capacity – there was a general lack of will with regards to tackling fraud (PFG13). One attendee noted that the reason that the police don't want to tackle fraud is because "for years narrative has been [that] it is a side issue to other more imminent and physically harmful crimes' (PPR8). It was also observed that police tend to 'like doing what they like'; and that many did not like handling fraud cases (PFG11).

Others noted the impacts of a lack of appropriate skills and education, a lack of facilitative collaboration, and – first and foremost – a lack of resources on motivations towards policing fraud. It was suggested that what is perhaps needed is greater engagement at grass roots level and local policing levels (PPR9); that as things stand, things only seem to be done higher up, and that buy-in is required from the lower levels (PFG48).

**"Fraud is not seen as a priority in the majority of forces, so to improve the policing response it needs to be highlighted from the top down that it is a priority..."**  
(PPR40)

Buy-in is also needed from senior leaders (PPR47); discourse suggested that drive towards tackling fraud needs to come from the top, in order to – hopefully – trickle down to the lower levels over time.

### The Issue of Funding

A key issue that came up time and time again was a lack of funding (and – relatedly, a lack of resources). It was noted that most resources are aimed towards key areas of policing that attract public attention: police visibility; road safety; burglary (acquisitive crime); and rural

crime (PFG2). The public are less interested and/or concerned about crimes such as fraud; they do not realise the huge spectrum of fraud or its links to other serious crimes such as drugs distribution or Child Sexual Exploitation (PFG56).

**"At present Fraud is competing with serious physical harm cases, such as rape, murder, stabbings etc.; which obviously drops the investigation down the priority list..."**  
(PPR36)

Increased funding and resource for tackling fraud – locally, regionally and nationally – was suggested to be needed by many in attendance (PPR12; PPR31; PPR32; PPR37; PPR43). It was noted that: 'Sadly, we have got to the stage where those resources [may] need to be ring fenced!' (PPR32).

**"[What is needed is] development of specific fraud investigation teams in each force, with sufficient resources and access to emerging technologies funded nationally for every force area. If they are centrally funded, this can be ring fenced and not in the mix of competing demands..."**  
(PPR37)

Many attendees wanted greater transparency regarding the use of funding and where money is spent (PFG1; PFG48). There was an implied view that all of the money is being used centrally – that there is no funding for local areas (VFG12). One key suggestion put forward was that we need to look into where the funding goes and what the outcomes are – for example; what goes into Action Fraud, and what do local areas see in terms of benefit? (VFG12)

It was also noted that more could be done with the resources that are available, for example; by opening up access to data and promoting the use of intelligence sources (with associated training where appropriate). As one participant said – 'we have the intel, but don't use it!' (PFG34).



**“More intelligence is needed, alongside education, as the police have the tools already. However, they are not being used to their full capability; therefore, the issue is not just funding”... (PFG70)**

**“We... need to use the tools we have. All forces have access to the SARs database, a wealth of financial intelligence but it only has limited use. ARENA is a fantastic tool that will help identify intelligence, money flows and opportunities to disrupt and detect”... (PPR35)**

More broadly, it was noted that more support was required for tackling fraud on a larger scale (PPR5; PFG24). Improved infrastructure is needed across the police in terms of profiling larger frauds (PPR11), with further investment in technology to allow for appropriate analysis of data to identify more effectively and efficiently the trends, patterns and risk within (PPR2).

It was suggested that increased investment in intelligence resources nationally, such as in developing a national intelligence system for linking fraud (PPR7), would help to ensure that investigations are conducted to a high standard, and that they are as comprehensive as possible (PPR3).

Increased external support was also seen to be potentially beneficial in enhancing current practice; it was noted that big companies can afford their own forensic analysts to investigate matters of fraud, and that the police should have a similar system in place (PFG59). Many felt that increased engagement with stakeholders and both the private and public sector could help in combating fraud (PPR10). An example of how this might work was provided for Humberside police, who have a localised fraud forum, and work with intelligence (and) support from Age UK and banks.

### **What Needs to Happen for Fraud to be Prioritised?**

In terms of moving fraud up the agenda, the Deputy PCC noted that “...we haven’t had our Dunblane moment” (PFG2). The public don’t view fraud as a priority, and that means that it remains low on the agenda, behind those where public demand for accountability and visible action is greater (PFG2).

It was observed that we need to actively build public understanding as to the fact that as long as there are people that are susceptible to fraud, the criminals won’t stop trying to exploit them, and that if you take out one organised crime group, many will pop up and try and take their place (PPR4).

Consumer education and raising awareness of the extent and severity of fraud was seen as key to getting fraud prioritised on local and national agendas, through generating pressure and demand for more proactive response (PPR4).

It was also suggested that, nationally, prioritisation of fraud should be signalled by government to PCCs and constabularies.

### **Increasing Transparency and Accountability around Fraud**

It was noted on a number of occasions and in different ways that one thing that might make a substantial difference with regards to pushing fraud up the agenda would be to have enforced requirements with regards to transparency, and increased accountability across the board. For example; it was suggested that if we were to re-establish proper fraud teams across all forces, then this could be made a priority area for PCCs on which they are judged (PPR16). This, it was felt,



## Appendix 4 – Policing Response

It was also noted that what was lacking but perhaps needed was accountability for NFA of fraud cases at different levels (PPR49). Examples were given where decisions to NFA cases were made even before seized evidence had been examined (PPR52). It was proposed that if we were to reduce the use (and acceptability) of giving 'no crime' allocations to fraud cases, and/or the recording of fraud as civil cases, this would both give more accurate figures, and would help to create a business cases for the need for greater resourcing (PPR50).

There were also calls for Action Fraud to take more accountability for some of its failings (PPR53). These included failing to notify victims of fraud, to allow the appropriate safeguards to be put in place to protect them from future frauds (PPR55). It was suggested that active steps need to be taken to remedy current shortcomings (see below).

### **The Challenges of Policing Fraud**

Concerns were expressed around the burdens placed on investigators in policing fraud (PFG64). It was noted that the complexity of cases has been increasing (and continues to increase) (VFG40), particularly with there being a greater need to work with external or foreign agencies on fraud cases (PFG23). One individual noted how the detection of fraud often takes far longer for fraud than other crime types, citing an average duration of 12 months (compared to 6 months for a homicide). Examples were also given regarding case complexity (PFG32), concerns about delivering (and the consequences of not delivering), and frustrations of having to rely on local media to get intelligence (VFG49).

One of the primary challenges with policing fraud is that there are many different types of fraud (PFG5), and it's not a case in terms of 'one size fits all' in terms of how to investigate/resolve them (PFG6). Officers said that they need to know how to deal appropriately with different types of case (PFG7).

Other challenges in policing fraud also include the fact that investigations are often restricted by time constraints, resourcing, GDPR restrictions, the fact that cases often involve multiple perpetrators, and the need to work with external agencies (PFG48).

These challenges, it was suggested, tend to be exacerbated by a lack of police education and training (PFG25). Some officers said that the police sometimes don't understand what it actually is that they are looking for when investigating fraud.

The general view was that frontline police only get a couple of hours training on fraud, which is not sufficient for such a high crime issue (VFG26). It was agreed that constables need more extensive training on how to investigate fraud (PFG64).

### **Improving Policing Practices With Regards to Fraud**

One participant noted that in thinking about how we might improve police practices with regards to fraud, the first thing we need to accept that fraud is not a crime that can be arrested away (PFG9). There was broad agreement that a more holistic approach to policing fraud is needed, with greater emphases on reducing and preventing crime (PFG68), and on supporting victims of fraud (PFG10). Related to this, a key issue was seen as being a need to improve public trust and confidence in the police (PFG18).



Many noted a lack of knowledge and understanding as key barriers to service provision. Some weaknesses in understanding relate to procedural issues, such as the ways in which cases are recorded or tracked. It was suggested that we need easier and more transparent recording systems to allow the nature and extent of fraud to be better understood at both a micro and macro level (PPR1). However; more broadly, it is clear that we need to consider how we can build knowledge, and therefore capacity, to provide a better response to fraud (PPR1).

**“Police [need] to receive fraud training. My experience of... Officers is that they know very little about fraud and often refer to fraud crimes as 'civil thefts'.”**  
(PPR51)

Many felt that the most obvious way to improve police practices with regards to fraud was more training for officers (PFG30), particularly in terms of how to manage and investigate cases (PPR57), and how to support victims (VFG26). Training in the use of relevant IT systems and other investigative resources should also be provided (PVG17).

It was suggested that training should be practically-orientated; for example – centred around identifying lines of enquiries (PPR57), enabling officers to gain experience of dealing with cases under supervision (PFG30). It was also suggested that training should come, at least in part, from external sources (PPR51). Suggestions were also made regarding the utilisation of experienced officers within fraud squads for training and review (PPR22) – retaining and drawing from the experience of such officers was seen as being key in improving broader police responses (PFG29).

Suggestions were also made with regards to the use of ‘cyber-specials’, or specialised frontline teams for tackling fraud (PFG21). Whilst many saw the potential value of this, some concerns were raised about the broad variety of forms

that fraud takes, and it was noted that broader expertise is needed as opposed to having officers who are too specialised, as their application might then be limited to specific cases or certain elements of cases (PFG29). Part of this overlaps with debate around at what level fraud investigations should be undertaken – locally, regionally or nationally, and who is most appropriate for dealing with what kinds of cases (see discussion below).

It was suggested that one way forward might be to get all police forces to sign up to splitting fraud cases so that suspect’s location force carries out suspect enquiries and the victim’s location force carries out safeguarding and victim enquiries (PPR58). However, there are likely to be issues with regards to having different forces responsible for different elements of case – as exemplified by some of the challenges associated with working with foreign police agencies that were noted (PFG22).

#### **What Legislation Needs to be Introduced to Better Facilitate Financial Investigations?**

It noted by many that current fraud legislation tends to be restrictive (PFG47), and to impede the progression or successful prosecution of fraud cases (PFG50). Most felt that legislation needs improving, including changing the ‘burden of proof’:

**“Restraining property and personal gains may bankrupt Trading Standards. The idea of following the money is too simplistic and does not really work, another approach is required because it neglects the expansion of the World Wide Web (Bitcoin). Red tape/production orders make any investigation difficult. A change of mindset... is needed.”**  
(PFG75)

**“Data sharing can be extremely difficult – the legislation exists, but it is seen as a negative it needs a different mindset to turn it around and focus on what the legislation can do.”**  
(PFG76)



## Appendix 4 – Policing Response

It was suggested that it would be helpful to review current laws, in order to ensure that they give the police the tools they need to tackle fraud (PPR45). Ideally, legislation should be kept up-to-date, being reviewed and developed in light of changes in the nature and characteristics of fraud cases coming into the system, and revised on a regular basis in light of the evolving situation (PPR46). This, it was observed, would help in clarifying the picture with regards to fraud, and would potentially help in eliciting change in narratives around fraud – making it clear to fraudsters what they might expect should they be caught, and encouraging more recognition and reporting of fraud from the public (PPR46).

### How Can We Improve Action Fraud?

Multiple issues were identified with how Action Fraud currently operates. Many of these are practical issues – such as the call centre lacking capacity to take or field calls, and/or technical difficulties experienced when dealing with Action Fraud (PFG77). It was noted that their databases are ‘painful’, and that there is a lack of co-ordination between the multiple separate databases and difficulties with uploading to these (PFG52).

It was also recognised that there were issues with how information is processed and distributed (PFG52). It was felt that Action Fraud need to be able to disseminate information to forces much more quickly, so as to ensure that opportunities to pursue and protect are taken at an earlier stage (PPR38). It was noted that often they do not even notify Local Authorities of potential fraud victims who may be regularly financially abused for them to take safeguarding measures to protect them (PPR54). Many felt that the police should be given the responsibility and resources to manage fraud locally, and that this would be more effective as the main reporting route for fraud (PPR29).

More generally, it was felt that the public don’t like Action Fraud, and don’t really understand why it’s used and why their local forces can’t

deal their cases directly (PPR41). It was suggested that the role of Action Fraud perhaps need to be reviewed, and potentially rebranded; that its role should be more focused on changing the public mindset and providing information as to the true nature of fraud (PFG77).

### Should Financial Investigations Sit Within Local Police Forces?

**“At this time, fraud is seen as a central issue and owned by the city. As such, there is limited impetus for locally held action plans. This leads to loss of evidence, knowledge and understanding. Whilst maintaining the lead force status, crime numbers should fall back to force with the victim location being the location of the crime...”**  
(PPR19)

It was generally felt that the majority of financial investigations should sit within local police forces; that it is not feasible for all to be investigated on a regional or national level, and that a scaled responses is needed. Local teams need to know when cases need to be scaled up, and when information needs to be passed over to other teams or agencies to be dealt with appropriately (PFG26).

There was agreement that some frauds were better investigated than others, and this – it was felt – has caused gaps in provision and response. As a result, the way in which we deal with large-scale cases is inefficient (PFG65), and resourcing has become a bigger and more complex issue (PFG15). For example, it was noted that regional teams could be occupied or taken out by a single case, which would then limit capacity for dealing with other cases (PFG26). It was noted that this might also lead to teams being reluctant to take big cases on (PFG26).



However, it was also noted that not all forces have complex task forces, or capacity to deal with some types of fraud cases (PFG33). It was suggested that perhaps cases be assessed in terms of their level of threat/risk, and that where necessary they are dealt with at a national level, but otherwise they are processed locally. It was suggested that fraud surgeries could be operated and accessible by local forces, to assist in the management and processing of fraud cases (PFG26).

Key to all of this was the feeling that we need to achieve greater levels of meaningful resolution to fraud cases (PFG33); that some form of triage and allocation system needed to be put into place to ensure that such resolutions are achieved, and that volume does not outstrip capacity (PFG33).

The recent Mackey Report was seen as provided a good basis for putting such an allocation/triaging system in place:

**“I think the MacKay report recommendations are about right. Cross border or international frauds should be dealt with by regional fraud teams - suitably resourced and funded. Force fraud teams should investigate local frauds, push the Prevent message and coordinate the Op Signature message. They should also support the regional hubs with case building (statements etc.)...”**  
(PPR15)

### **Where Should Overall Responsibility for the Policing Response Lie?**

The general consensus was that when investigating fraud, who is best placed to manage and be assigned responsibility for cases depends on the level of fraud (PFG66).

It was felt that the ideal would be a multifaceted approach, consisting of high-grade detectives, civilians (outside agencies) and specialist analysts, in order to ensure that complexities and caseloads are managed effectively (FFG66).

**“[We need a] fraud enforcement service with a range of enforcement agency expertise subsisting within the service. It should not be an agency commissioned by and operated for constabularies. The SFO should remain for complex large corporate fraud, bribery and corruption but there has to be a single localised response to all other forms of fraud that impact on individuals and perhaps SME businesses...”**  
(PPR20)

It was noted that in some instances civilians or outside agencies would be in a better position to tackle cases (that investigations wouldn't necessarily require warranted officers), and that there needed to be smoother processes to enable this to happen and to prevent issues regarding allocations and who takes responsibility for any given case or cases (PFG27).

Such a strategy might also include upskilling financial investigators in national agencies, to take on the more complex or specialised cases (PPR17), and who could also take on private/civil cases (PFG20). It was noted that more and more frequently investigators are being hired privately (PFG16), with numbers of civil prosecutions increasing (PFG17), but that there is a lack of consistency in terms of how investigations external to the police are conducted (PFG46), and whether these are being dealt with appropriately by external agencies/businesses (PFG74). Having such a system in place would help alleviate such issues, and would address some concerns that were expressed about the fact that the police should not be policing businesses – that their priority should be the protecting the general public (PRG45).

## Appendix 4 – Policing Response



“There seems to be a lack of police willingness in tackling employment fraud because police believe that the business should handle this themselves. However, businesses do not report fraud a lot of the time because it the investigation needs a high burden of proof for the police to investigate it; to announce fraud is not good for business and cyber insurance is taken out by companies, which puts small businesses at risk because they may not be able to afford the insurance...”  
(PFG74)

### **Working in Partnership on the Fraud Agenda**

Throughout the focus group, the general feeling was that a more holistic approach to tackling fraud is needed, with partnership working being at the forefront with regards to providing an effective response to fraud (PFG24). An example of how this can work was provided by Humberside Police, who have implemented a localised community approach which has included victims of fraud and Banks to tackle fraud (PFG57). However, a number of barriers to partnership working exist (PFG19), which need to be addressed in order to enhance co-ordinated responses to fraud. These largely relate to gaining co-operation from involved parties (PFG61) – which can be particularly difficult with cases that involve international partnerships (PFG62).

Overcoming such barriers, and providing a coherent, effective, multi-partnership approach should be a key focus of any fraud agenda.

### Best Practice in Supporting Victims

Throughout the session, a number of examples of best practice in supporting victims of fraud were provided.

These included the following:

- In Lancashire, the police Economic Crime Unit deals with the high harm cases and the City of London service deal with the low level crime (VFG1). They use telephone contact to find out from a victim whether they have been a victim again, by calling in six months after the original referral. In a survey of 50,000 individuals in the region covered by the scheme, only seven had been repeat victims of fraud (VFG46).
- Cambridgeshire pays for a dedicated victim support unit within the main victim support service. They also run the Peterborough and Cambridgeshire Scams Partnership, with dedicated staff and the option for individuals to go directly to the victim service for support (with disclosure being recoded for prosecution purposes in such instances) (VFG3).
- North Wales Police fund a financial safeguarding officer post. The officer, on a daily basis, reviews the cases and provision, and assesses the vulnerability of the individuals involved. Standard protocols are used for this, but professional discretion is also employed, and the officer then lets the police officers know if a person needs a visit and further risk assessment or additional assistance (e.g. mental health, advice regarding banking behaviour). A variety of factors leads to a score being generated, and this triggers further intervention opportunities/visits to help prevent repeat victimisation. The offer will refer to the voluntary section if/where needed. This helps in focusing resources where they are most needed (VFG4).
- Humberside Police have a designated victim referral pathway, with victim liaison officers (VLOs) dealing with enhance needs (VFG5).

- The Coventry Building Society employ a system whereby if someone is scammed they try and understand how and why the incident happened, with extensive case review. They will refer to Action Fraud and victim services as required, and provide links to social services, Age Concern (or similar, and even visit the individual for further support if needed (VFG18).

Discussions around best practice highlighted - as also noted elsewhere during the session - the need for more funding and greater support for such work, in order to facilitate the continued running and further development and expansion of such schemes.

It suggested that such examples could be publicised more widely, being used as models of good practice for others to draw from.

### Creating a Better Experience for Victims of Fraud

A number of issues around current support provisions for victims formed the basis of suggestions as to how we might create a better experience for victims of fraud.

For example; it was noted that the turnaround of cases once someone reports a fraud is around eight weeks, which was deemed to be unacceptable (VFG14). Some instances were noted where provisions were taking many months to contact/respond to victims (e.g. the National Economic Crime Victim Contact Unit) (PVR13).

It was agreed that we need to ensure that victims are supported earlier; at the moment, information comes to local forces too late, which means there is a delay to the victims' gateway (PVR13).

## Appendix 5 – Victim Support



Somewhat related to above; it was noted that we need to manage the expectations of victims better (VFG31), for example; in terms of time frames and likely outcomes. It was noted that greater transparency and honesty with regards to what the police can do and whether and how the case can/might be resolved could help improve public trust and confidence (PPR21). This, it was suggested, would be preferable to clouding things in ‘a PR smoke of reassurance and reforms’ (PPR21).

Some of the issues around limitations and weaknesses in current victim provision stemmed directly from current uses of Action Fraud. As noted by one participant, you have to report to Action Fraud (as it’s a national requirement), even if this is not in the best interests of the victim or the best approach from the victim perspective (VFG15).

**“By Action Fraud having a legal duty to refer matter to Local Authorities to enable them to place relevant safeguards in place. The current situation is that Action Fraud keeps all the information, and there may be victims out there who do not receive any service and may continue to be financially abused...”**  
(PVR39)

A number of delegates noted that the services provided by Action Fraud are limited (VFG11), and that victims have little confidence in it (PVR11). It was suggested there are perhaps better avenues and organisations for providing support (VFG19).

**“In my opinion most areas have established services that are able to fully support victims of fraud. The difficulty is getting to that support effectively. Action Fraud do not send across sufficient detail in the majority of cases to enable victim services to actively offer support. All fraud reporting should be directed through police reporting channels that way victim services would pick them up as they do all other victims of crime...”**  
(PVR18)

Current systems like Action Fraud offer little by way of a triage service for victims, which was flagged by many as a key failing of the system. As noted by one participant; they are designed for intelligence gathering, and will always be in conflict with victim support, because any actions are based on an intelligence led, highest priority model (PVR9).

It was suggested that the starting point for improving services for victims should be recognition of the fact that there is no effective single point of contact for fraud victims. In order to counter for different types of needs, it was suggested that we should invest in the NFIB for reporting and investigation, and rebrand Action Fraud into a more victim-focused service (PVR37).

In terms of other strategies for creating a better victim experience; it was noted that it would be beneficial to have more officers able to give safeguarding and prevention advice (PRV41). For example; North Yorkshire have bought the victim referral hub in house, and have a safeguarding officer to identify where more extensive intervention and support is needed (VFG15) – this was seen as something that it could be beneficial to employ in other forces, as responses so far have been positive.

Other suggestions for improving outcomes for victims included looking at other avenues for recompense for victims in cases where thresholds needed to prosecute could not be met (PPR14). It was argued that POCA should be used more extensively to help with redress (PVR8), and to boost recoveries, especially around UWOs and civil recovery (PPR18).



It was noted that we need to ensure that victims are aware of the full range of services and support that is available to them; that in many instances they are not appropriately informed as to options open to them. Police officers indicated that they themselves weren't aware of what services or support organisations like Action Fraud could offer to victims (e.g. PVR 3). This suggests that referrals are being made without any consideration of victim needs or whether they are being met. Improved signposting for victims (PVR16) should be a key priority in enhancing victim support provision. All victims should be able access advice and support (PVR15), from a source compatible with their situation and needs (PVR21).

**“Our aspiration has to be some form of contact with every victim of fraud. We cannot investigate every crime but we can offer support, advice and guidance to victims...”** (PVR20)

### **Communicating Risk and Methods of Prevention to Vulnerable Targets**

Throughout the session, it was noted that much of the work done focuses on investigating those fraud cases reported, rather than working on prevention and support. It was suggested we needed more of a focus on vulnerabilities, and how these might be identified and used to help target prevention efforts (PVR36). Key themes of public perceptions of fraud (PFG4), of broader educational strategies to prevent victimisation (VFG33) and increase resilience (PVR24), and/or for target-hardening (PVR38), were referred to on multiple occasions.

**“More consideration of commissioning prevention and education work for vulnerable cohorts. Whilst support services are important for those who have been victims, better investment in prevention and education will reduce the risk of victimisation...”** (PVR30)

Associated suggestions as what could be done to enhance public knowledge and understanding around fraud included:

- Targeted education with regards to IT use and online risks (PVR4)
- A greater focus on such issues in the educational syllabus (from primary teaching through to university levels) (VFG33)
- Increased exposure via mainstream media (e.g. TV documentaries, prime-time coverage (PFG55)

### **Delivery of Victim Services**

There was lengthy discussion about who is best placed to delivery victim services. One key point that was raised repeatedly was that the police can't do everything, nor should they (PVR2), and that support does not necessarily need to be provided by warranted officers, but by someone with appropriate skills given the circumstances and situation (VFG6).

It was noted that some third parties (e.g. Victim Support) may be better-equipped to deal with victims of fraud (PVR2), and that they could play a greater role – for example; in co-ordinating responses and/or in providing and advertising volunteering opportunities (VFG10). However, participants were divided as to whether the voluntary sector might provide better support – particularly given the fact that fraud cases take time and such sectors have high turnover rates (VFG8). There was also the feeling that they are not appropriate for representing police services (VFG8).

One suggestion as to how delivery of services might be improved was to have local provision co-ordinated through OPCC Victim and Witness Care Units (PVR19). This could potentially avoid some of the co-ordination issues that were identified (PVR7).

## Appendix 5 – Victim Support



It was also suggested that NECVCU services could be rolled out nationally, to all victims (PVR14). One key advantage to this, it was argued, is that this would offer vital services to those who do not want to report a fraud through formal channels (PVR14), or who are unwilling to engage with the police (PFG60).

**“The victim should decide [who/where they get support from]. Not everyone wants the police, we should be offering different routes and this needs to be led by an assessment by a victim service who understands what victim needs...” (VFG35)**

Discussion also included suggestions as to other potential sources of support which aren't currently being utilised but which could potentially offer some useful opportunities; for example – Cambridgeshire police are looking to utilise Neighbourhood Watch representatives to support victims (VFG7). It was noted that such individuals might be more relatable for victims (PFG53), who are potentially wary of more official channels, or who might lack confidence in the police.

Such avenues could also be potentially fruitful for preventative efforts; it is suggested that potential third party contributions such as these be explored further, in order to broaden the range of resources available for supporting victims and general capacity for support provision.

With regards to who should be in charge of co-ordinating victims services; at present, many forces deal with victim support provision in house, and commission out to Victim Support or other voluntary sector organisations where appropriate (VFG36). However, it was suggested that this might not be appropriate; that in fact such provisions should be provided independently, as this would ensure greater focus on victim needs, as allocations would be made by those who understand those needs better (VFG37).

### **Private Sector Responsibilities With Regard to Victim Services**

The general view was that the private sector (and particularly the banking sector) have good systems and products in place for addressing fraud (VFG42), and that they are increasing taking more responsibility with regards to the role that they play in victim service provision (VFG41). In many ways, it was proposed that the police and government are in many ways lagging behind the private sector, in terms of investment in victim support. However, it was also noted that some regulated industries are not contributing to the fraud agenda (VFG43).

It is suggested that current contributions such perhaps be reviewed, and appropriate levels of responsibility for different sectors determined.

### **Measuring and Tracking Outcomes for Victims**

One key theme that was present throughout discussion of victim support was the fact that the criminal justice system is not effective or able to deal with fraud prosecutions and compensation processes. The CPS representative noted that sentences for fraud are not necessarily appropriate, and the processes throughout investigations and prosecutions – particularly in terms of appeal processes – can be hard to understand (VFG17). For example; the confiscation and compensation process still hasn't been finalised by the FSCS, and victims still haven't had the money that they are entitled to (VFG17).

It was noted that we need to better track the progression of cases through the criminal justice system, in order to understand what factors come in to play when determining the outcomes of cases (VFG16).

As a note; better tracking and more robust data would enable us to assess the efficacy of different strategies and schemes for tackling fraud. Many questions were raised throughout the focus group, and it is likely that this would constitute the only way of providing robust and reliable answers to such questions.



### Improving Services for Victims

In terms of how we might improve services, four key needs were identified:

1. We need to understand the issues better, so that we can provide more tailored support.

As one delegate asked: 'How you identify the vulnerable from a large list of names?' (VFG2).

We currently do not have enough information to inform the allocation of resources to cases.

**"There are such a vast array of victims.... Responses need to take a case by case approach" (VFG25).**

We need to understand vulnerability better (PVR23); at present, it is measured using many different factors, and so it is hard to identify (VFG45). Better analysis of more robust data would enable us to better identifying the most vulnerable and those in need of support. In turn, better processes could then be put in place (by police and other agencies) (PVR27).

2. We need to learn from victims to learn how to better support them.

**"With regards to the services being improved, actual victims, their family members and supporters should be given the seat when it comes to recruitment to wipe out the corruption and malpractices that exist within our own force to this current day..." (PVR28)**

Engagement with victims was seen as key in determining the needs that they are likely to have and how best to support them (PVR6).

3. We need to set clear standards with regards to victim support provision.

It was suggested by a number of those attending that we need to set standards across the board with regards to how victims and fraud cases should be handled (e.g. PVR34). Provisions such be evaluated in line with the prescribed standards, to ensure that these are appropriately met (PVR32).

Relatedly; there should be a minimum response requirement with regards to how victims are handled. Victims of fraud should be supported in the same way victims of traditional crimes are, with a threshold of support based on vulnerability and level of loss (PVR40).

**"Minimum standards guidance should be introduced, so that each force should have a local Victim service department and an additional vulnerable victim team, which sits alongside a Safeguarding hub, to ensure that each victim at the very least gets a service but depending on the risk or needs to the individual this service can be upgraded and referrals made with additional help..." (PVR33)**

4. We need to ensure consistency in delivery/provision.

**"There should be standardised provision for victims of fraud across the country with appropriate investment in victim care both internal and external to law enforcement." (PVR1)**

## Appendix 6 – Fraud: A Research Agenda




In terms of current lack of understanding with regards to fraud;

- We have little info about different types or sub-sets of fraud; much research groups many different types of fraud, and we don't know if this is appropriate or instead a differentiated classification of fraud should be used to provide more accurate portrayal.
- There has been next to no research into the characteristics of those who perpetrate fraud, or how they might be identified (e.g. criminal history antecedents etc.).
- Knowledge of vulnerabilities to victimisation and vulnerable groups remains limited.
- We don't know how people view fraud, what influences their perceptions of fraud, or their ability to detect fraud. We need to know how individuals respond to experienced fraud, as this has notable implications for the development of support and prevention strategies. It would also enable us to gauge the accuracy of prevalence estimates, as well as for identifying barriers to reporting victimisation and for education around risks.

What follows below is a proposed agenda for research into fraud in order to address gaps in current knowledge and understanding:

1. Research should seek to establish the general prevalence of fraud and to establish the extent to which it affects the daily lives of the public
2. Insights are needed into public experience, understanding and reporting of fraud (including things that promote understanding and reporting, and potential barriers to reporting and help-seeking of victims)
3. The nature and characteristics of different sub-types of fraud should be examined. Research should seek to derive models for different types and sub-categories of fraud, so that we better understand how each operates.
4. The characteristics of (different types of) fraudsters, including risk factors for fraud perpetration and criminal history antecedents), should be explored.
5. Profiles should be developed of characteristics of victims of different types of fraud, with consideration of vulnerability and risk factors
6. The issue of repeat victimisation needs to be addressed.
7. The effectiveness of strategies for tackling fraud should be established using empirical measures, with relative effectiveness being a key focus of work in this area.
8. Research should examine the processing and conviction of fraud, by tracking fraud cases through the criminal justice system and examining the factors which influence case attrition.



## Appendix 7 - The Dynamic and Evolving Nature of Fraud: The Coronavirus Example

From the onset of the recent coronavirus pandemic it was noted that novel and targeted forms of fraud were emerging (e.g. as detailed in the Europol report on 'Pandemic Profiteering'). It was estimated that by the 24th April 2020 losses as a result of coronavirus fraud in the UK stood at around £2.4 million (figure cited by Home Secretary Priti Patel at the UK daily press conference on the 24th April 2020). By that stage in the pandemic, the National Cyber Security Centre, National Crime Agency and City of London Police had already taken down more than 2,000 online scams relating to Coronavirus, including fake online shops; malware distribution sites and phishing sites seeking personal information such as passwords or credit card details.

What this emphasises is the need for, and value of, a fast and effective response to emerging and evolving threats, such as those facilitated by the COVID-19 pandemic.

Lynne Owen concluded a statement given during the UK's daily press conference briefing on the 25th April 2020 by providing reassurance that "While the nationwide restrictions are in place – and you are staying home to protect the NHS and save lives, we, the National Crime Agency – together with our law enforcement partners – are pursuing, relentlessly, the most harmful criminals, whoever and wherever they are – to keep you safe".

Can we honestly say that this is the case?

From discussions which took place during the recent National Fraud Forum, it does not appear that the systems currently in place can facilitate delivery of relentless pursuit, nor are the resources available to support such a response.

However, there are examples of good practice emerging, which offer ways forward in terms of enhancing response to dynamic and evolving situations. For example; the Fraud Advisory

Panel have set up a COVID-19 fraud watch group which is a cross-sector and cross-industry coalition of trusted partners (including the Cabinet Office and City of London Police) who meet weekly to share information on emerging fraud threats and trends affecting business. The panel aims to act as a conduit to warn the public, private and third sectors about COVID-19 fraud risks and the preventative actions that can be taken.

Advice given (at the time of writing: 21.05.20):

### CURRENT COVID-19 FRAUD RISKS

- Impersonation of the Department of Education (esp. the grants to provide IT equipment to children and free school meals)
- Illegal selling of NHS prescription medicine
- Infiltration of email chains containing e-licensing materials for drugs and firearms
- Phishing emails purporting to be delivery companies (esp. FedEx, DHL and UPS)
- Impersonation of Government departments (esp. DWP, HMRC)
- Fake payroll and DocuSign emails
- Business continuity malware
- CEO and mandate fraud
- Fake invoice attachments containing malware
- Ransomware

### ANTICIPATED AND/OR EMERGING ISSUES

- Increased risk of delayed fraud trials due to difficulties in convening jury's due to social distancing and self-isolation due to illness.
- Predicted opportunistic defaulters leading to a downstream of proceeds of crime and fraud offences.
- Staff leaving their jobs while working from home but retaining access to the company's systems, data and equipment creating opportunities for fraud.
- In Asia concerns have been raised about increases in tax evasion, bribery and corruption relating to supply chains and terrorist financing activities.

## Appendix 7 - The Dynamic and Evolving Nature of Fraud: The Coronavirus Example



### SOME SIMPLE PREVENTATIVE TIPS

- Review of business policies/processes (eg. Bring Your Own Device) to ensure adequate controls are in place for staff working from home.
- Review and update staff 'leaver' processes for remote working to ensure the safe return of company information/equipment and to block access to systems. Use BAC's payments where possible. Independently verify invoices from suppliers – using contact details known to be genuine – before making payment.
- The FCA's FCSC has provided additional COVID-19 guidance for regulated firms. Available [here](#).
- FATF has produced additional guidance for business.

Having easily accessible, readily available advice, based on research, evidence, past experience and expert guidance and which is kept up to date is a great example of good practice with regards to preparing for and managing emerging and evolving threats. So too is anticipating potential issues, and coming up with contingency plans for managing (or ideally even circumventing) these.

Informed, dynamic responses to prevention are also likely to be effective in such situations. In her address, Lynne Owen outlined a range of steps that individuals could take to protect themselves and their loved ones, including their children, from emerging threats:

"Firstly – protect your children online. We have created a range of material that will help you to talk to them, however young they are, and without frightening them. It includes guidance on how to identify manipulative behaviour. You can find a step-by-step guide at Think U Know dot co dot uk.

Secondly - Stay Safe Online: The new Cyber Aware campaign sets out six top tips on how to protect yourself online. These include creating

strong passwords using three random words, regularly updating your devices and turning on backup. More details are on the cyber aware website.

Thirdly – Look After Your Money. Fraudsters have targeted members of the public by phone, by text and by email. They have used the current situation to peddle fake testing kits and prescription drugs. We are asking you to be vigilant for these scams. Be even more cautious than usual if you are contacted by unknown numbers and don't open suspicious emails or their attachments. The police and banks will never ask you to withdraw money or transfer it to a different account. If you believe you are a victim, please report it to your bank and Action Fraud immediately"

(Lynne Owen, Director General – NCA; 24.04.20)

The approach(es) outlined above constitute a useful basis for the development of adaptable templates for adoption in light of novel and emerging fraudulent threats, and are included here as a reference and resource for such proposes.

The Statement of Government Policy on Adult Safeguarding, published by the Department of Health in 2011 states:

**“The State’s role in safeguarding is to provide the vision and direction and ensure that the legal framework, including powers and duties, is clear, and proportionate whilst maximising local flexibility. This framework should be sufficient to enable professionals and others to take appropriate and timely safeguarding action locally while not prescribing how local agencies and partnerships undertake their safeguarding duties.”**

The focus group’s view that governance should have three tiers, but have flexibility so locally it can be constructed in a way which supports local needs, is absolutely central to the governance of Adult Safeguarding.

“The departmental board is the collective strategic and operational leadership of the department.

The board:

- supports and advises ministers and the department on strategic issues linked to the development and implementation of the government’s objectives for the health and care system
- horizon scans for emerging issues
- sets the overall strategic direction for the department in the light of ministerial priorities, the spending round settlement and the business plan
- oversees the management of risks within the department
- oversees and monitors performance.”

There are also circa 30 advisory committees supporting the department board, each with clear distinct membership, remit and governance, and all report directly into the department board to provide advice and insight on focused subject areas.



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