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# Spotlight report A review of Fraud: Time to Choose

A revisit of the 2018 fraud inspection to assess progress of the recommendations and areas for improvement

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# **Summary**

In 2018, the Home Secretary commissioned Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) to carry out a thematic inspection of fraud.

We conducted our inspection between March and July 2018. In April 2019, we published *Fraud: Time to choose – An inspection of the police response to fraud.* In that report, we made 16 recommendations and identified 5 areas for improvement (AFIs).

We have revisited our previous inspection to see how the police service has responded to the recommendations and AFIs we made in that report. This report presents our findings on the progress that has been made.

### **Changes since our 2019 report**

Since the publication of our 2019 report, not enough has changed. Too many victims still receive a poor service and are denied justice. The investigation and prevention of fraud offences, by police forces, remain under-resourced and are not given enough priority. Also, there are too few fraudsters held to account.

In our 2019 report, we concluded that a lack of capacity and capability in tackling fraud had an adverse effect on the quality of service provided to victims of fraud.

In 2020, Sir Craig Mackey reported that the capacity and capability of forces to investigate fraud were outweighed by the scale of fraud offences.<sup>1</sup>

These conclusions remain the case today.

The effect of fraud on the UK is still huge, and the chance of becoming a victim of it is still far too high. It causes misery to victims, individuals and businesses, and damages the national economy. It is estimated to be the type of crime that has the highest number of incidents committed in England and Wales. Adults are still more likely to be a victim of fraud than any other crime.

<sup>&</sup>lt;sup>1</sup> Fraud: A review of the national 'lead force' responsibilities of the City of London Police and the effectiveness of investigations in the UK, Sir Craig Mackey QPM and Jerry Savill, 24 January 2020.

# Progress against our 2019 recommendations and areas for improvement

Only 10 of our 16 recommendations have been implemented. There has been progress on a further two and three remain outstanding. One of the recommendations is no longer relevant.

We consider that only one of the AFIs has been dealt with. There has been progress on a further three, and one remains outstanding.

# Improvements have been made in fraud processes but more needs to be done

Some improvements have been made, such as the way in which fraud-related <u>organised crime groups (OCGs)</u> are identified and 'mapped', and how people are prevented from being drawn into fraud or committing further offences. But more needs to be done to improve consistency in these areas.

Work has begun to improve national and regional tasking and co-ordinating processes. But information about good practice is not routinely being identified, evaluated or circulated to those tackling fraud. And there is not enough effort made to find out how effective alerts and campaigns are. More needs to be done to advance these recommendations and AFIs.

### A clear fraud strategy but resources remain insufficient

The Economic Crime Strategic Board (ECSB) has extended its remit to all forms of fraud, and the Home Office is developing an overarching fraud strategy. The City of London Police's role as the national lead police force for fraud is clearer than it was. And there is now a three-year national policing strategy for tackling fraud. But the fact that funding is only confirmed a year at a time, and with relatively short notice, makes it difficult to plan and invest for the long term. The amount of intelligence, investigation and prevention work that fraud requires is not matched by the resources allocated to it.

# The National Fraud Intelligence Bureau has improved its intelligence products and is planning to introduce a new computer system

The computer system currently used by the National Fraud Intelligence Bureau (NFIB) to collect and analyse intelligence about fraud is not fit for purpose. Rather than fix the current system, the plan is to replace it with a new one – but this won't happen until 2024. This means that the police will have to keep using the existing, poorly functioning system until then.

The NFIB has improved its intelligence products, and forces now make better use of them. Police forces have been given guidance on how to record and report on cases sent to them for investigation. This has led to a more consistent approach and reporting on the outcomes of cases has improved a lot.

### Too many victims still receive a poor service

While there have been some improvements to the service provided to victims, more needs to be done.

Action Fraud is the UK's national reporting centre for fraud and cyber-crime. In response to our recommendations, it has taken steps to raise awareness of its role with both the public and practitioners. Forces are now generally better at identifying vulnerable fraud victims and communicating with victims in a timely manner. Some forces have created victim care roles.

There is confusion in forces about when and how they should respond to a report of fraud. Many victims are not given enough information about how (or whether) their case will be investigated.

The length of time people have to wait for their call to be picked up by Action Fraud, and the number of people who hang up before they are answered, are still unacceptably high.

# Recommendations

We have made three further recommendations in this report.

### **Recommendation 1**

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

### **Recommendation 2**

By 31 March 2022, the National Police Chiefs' Council Coordinator for Economic Crime with the National Crime Agency, National Economic Crime Centre and City of London Police should set up an effective national tasking and co-ordination process for fraud.

### **Recommendation 3**

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

# Introduction

### **About HMICFRS**

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire and rescue services in England and Wales, in the public interest. In preparing our reports, we ask the questions that citizens would ask.

### **About fraud**

In 2019, we described fraud as a unique type of crime. There are more instances of fraud than of any other type of crime. They are often complex to investigate and victims and offenders are often remote from one another, in different parts of the country or the world.

Unlike most other crimes, there is a national process for reporting fraud and deciding which cases will be investigated. But it is rarely seen as a priority outside those organisations that have a specific national-level responsibility.

### The resources allocated to fraud don't match the scale of the problem

A total of 731,000 fraud offences were reported to the National Fraud Intelligence Bureau (NFIB) in the year ending September 2020, making up 13 percent of all recorded crime.<sup>2</sup>

However, many instances of fraud are not reported. The Crime Survey for England and Wales estimated that in the year ending March 2020 there were 3.7 million incidents of fraud. Fraud made up over a third (36 percent) of the total estimated crime and was the largest stand-alone crime type.<sup>3</sup>

And yet, despite the scale of the problem, less than 1 percent of all police personnel (1,618 full-time equivalents) were involved in fraud investigation.<sup>4</sup>

In his review of the national lead force responsibilities, Sir Craig Mackey said:

There is an overwhelming mismatch between the scale of fraud offences and the capacity and capability of forces to investigate them.<sup>5</sup>

<sup>&</sup>lt;sup>2</sup> Crime in England and Wales: Year ending September 2020, Office for National Statistics, 2021.

<sup>&</sup>lt;sup>3</sup> Crime in England and Wales: Appendix tables, Office for National Statistics, 2020.

<sup>&</sup>lt;sup>4</sup> Police Workforce, England and Wales: 31 March 2020: data tables third edition, Home Office, 2020.

<sup>&</sup>lt;sup>5</sup> Fraud: A review of the national 'lead force' responsibilities of the City of London Police and the effectiveness of investigations in the UK, Sir Craig Mackey QPM and Jerry Savill, 24 January 2020.

### The misery of fraud victims

The suffering felt by fraud victims cannot be overstated. Most of the estimated 3.7 million incidents of fraud are not reported. Through embarrassment, shame or guilt, many victims suffer in silence.

Every day, victims feel the devastation and misery that is the inevitable outcome of fraud. Many have had their trust and confidence destroyed. Some victims lose their entire life savings through fraud – although the loss of even relatively small amounts can still have devastating consequences.

The effects of fraud reach far beyond finances. People affected by fraud can suffer serious psychological and emotional problems. They have described experiencing a wide range of emotional responses including distress, sadness, vulnerability, isolation and anger. Fraud can also have effects on mental health, resulting in anxiety, depression and suicide.<sup>8</sup> Such emotions and reactions put great strain on individuals, families and relationships.

It can take a very long time to come to terms with being a victim of fraud. Younger people might be able to recover financially from such events, but for older people fraud can have permanent and life-changing consequences.

As part of our inspection, we examined cases and spoke to victims and their families. They told us how fraud has affected their lives. The case below was shared with us by a family member of the victims. It highlights the traumatic effect fraud can have, both on financial security and emotional wellbeing. It also shows that the police alone cannot tackle fraud. Financial institutions should take great care to follow the agreed processes that have been designed to prevent offences such as this.

<sup>&</sup>lt;sup>6</sup> Fraud and cyber-crime, Victim Support.

<sup>&</sup>lt;sup>7</sup> Scamming and its effect on vulnerable victims, Age UK, September 2016.

<sup>&</sup>lt;sup>8</sup> <u>Guide to Understanding the Total Impact of Fraud,</u> International Public Sector Fraud Forum, 10 February 2020.

### Case study

Pam and John, a couple in their sixties, worked all their lives but had no savings. (Their names have been changed to protect their identities.) In late 2019, they received an inheritance of £180,000, which Pam deposited in her bank account.

In early 2020, Pam received a phone call, which she believed was from the overseas department of her bank. It was, in fact, a fraudster. They told her that £4,000 had been transferred from her account to an account in another country, and that she needed to go to her local branch and transfer money into 'safe' accounts that had been opened for her. She was told that this would prevent fraudsters from stealing her money.

Pam was so frightened she did not even tell her husband. She went to her bank and transferred £40,000. Following further instructions from the fraudsters, she then went to a different branch and made additional transfers totalling £150,000.

Pam returned home in absolute panic and despair. At home, she was again contacted by the fraudster who said that the bank had declined one of the transactions for £20,000. She was pressurised into calling the bank to get this transaction completed.

The next day Pam was told to return to the bank and transfer a further £5,000. Again, she did what she was told. At this stage, she was completely confused, desperate with worry and unable to sleep.

Moving such large quantities of money around was highly unusual behaviour for Pam. But, although she had been a regular customer of the bank for 35 years, she was only questioned about one transaction. She was asked, "Are you being coerced?" She didn't understand the question and was allowed to make the transfer.

A few days later, she was contacted by the bank and told that she was overdrawn. She went to her branch to ask if the overdraft could be stopped. It became clear that she had been a victim of fraud. A further £3,000 in fees and overdraft charges left the family destitute and needing to rely on the generosity of relatives.

The effect of this fraud has been devastating for Pam and her family. Their computer is now stored in the garage for fear of being eavesdropped, and the telephone is unplugged. Both Pam and her husband are taking medication for anxiety and depression, and refuse to leave the house. John has talked about taking his own life. Their daughter has had to take time off work to care for them.

Some excellent work by the local police financial abuse safeguarding officer and <u>UK Finance</u> resulted in Pam and John being reimbursed by her bank, who covered the loss.

Their financial problems may have been resolved – but their emotional wellbeing will take far longer to recover.

### **About our commission**

In our 2019 report, we said:

There is a choice to be made. Leaders in government and police forces can either continue to respond to fraud in an inconsistent manner, often leaving victims confused and disillusioned, or they can act to ensure that there is a clearer strategy, less variation in service between forces and better communication with the public.

Two years later, we set out to establish what choice had been made. Our inspection examined how the police service and other interested bodies had responded to the recommendations and areas for improvement (AFIs) we had made in 2019.

The fieldwork for this inspection took place between January and March 2021.

In accordance with our terms of reference, we set out to examine:

- to what degree the recommendations and AFIs have been implemented?
- where recommendations or AFIs have not been implemented, are they still relevant and necessary to improve the response to fraud?
- what barriers exist to implementing the outstanding recommendations and AFIs?
- what needs to be done to remove or minimise these barriers to achieving the outstanding recommendations and AFIs?
- to what extent has the implementation of the recommendations and AFIs led to improvements for victims reporting fraud?

### Methodology

As part of this review, we examined several hundred documents that included national guidance, strategies, policies, briefing documents and minutes of meetings. We also reviewed all 43 police force websites and the website for Action Fraud.

In our fieldwork for this inspection, we:

- interviewed police officers and staff from 11 police forces (including City of London Police, the national lead force for fraud), nine <u>regional organised crime units</u> (<u>ROCUs</u>), Action Fraud, the NFIB, the College of Policing, the National Crime Agency (NCA), the National Economic Crime Centre (NECC), and the National Police Chiefs' Council (NPCC) Co-ordinator for Economic Crime; and
- consulted other interested parties, including the Home Office, Crown Prosecution Service, Association of Police and Crime Commissioners, UK Finance, Cyber Defence Alliance, Cifas, other organisations that work with or support victims, and victims of fraud themselves.

This report details the progress that has been made on the recommendations and AFIs, including background information, and gives our 2021 findings and judgments.

# Progress against recommendations

In our 2019 report, we made 16 recommendations and consider that:

- 10 have been implemented;
- 2 have been partially implemented; and
- 3 have not progressed in any meaningful way and so we consider them to be not implemented.

We are satisfied that one recommendation is no longer relevant.

### **Recommendation 1**

In our 2019 report, we made the following recommendation:

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

In 2010, City of London Police established the NFIB. In 2014, it also took responsibility for Action Fraud. The force recognised that the NFIB intelligence database, Know Fraud, was not fit for purpose. As a result, the force started a project to design and implement a new intelligence system. In our 2019 report, we recommended that forces should be told what could be expected of the new system and when.

Our 2021 inspection found that the first part of the revised Know Fraud system, known as the Strategic Analysis and Intelligence Platform (SAIP), went live in October 2018. However, it has been beset by problems. We were told that the force has a strained relationship with the suppliers; that SAIP is not fit for purpose and that it isn't feasible to improve it. These complications mean that it hasn't been possible to publish a timetable of future developments, as per our 2019 recommendation.

### This recommendation has not been implemented.

City of London Police has started work on procuring a new intelligence system. It is expected that the new system will be in place by 2024.

Our inspection found that some consultation has taken place between City of London Police and interested parties regarding the development of the new system. Our inspection revealed that some forces are unaware of the problems with the current system and the difficulties in developing a new system. We urge the NPCC

Coordinator to give regular updates to all forces, including, where possible, predicted timescales.

### **Recommendation 2**

In our 2019 report, we made the following recommendation:

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

As we outlined in the previous report, the NFIB is responsible for recording the outcomes of reported frauds. To do this, they rely on police forces supplying updates on the investigations that they are given by the NFIB. But not all forces were providing this information on a consistent basis. In 2019, the bureau said that the situation was getting better, and they had a process for highlighting which forces needed to improve. Our recommendation was made to support that improvement process.

Our 2021 inspection found that guidance had been issued to all forces by City of London Police in September 2019. The force has also created a new role responsible for overseeing and co-ordinating information provided by other forces about the outcomes of cases. The publication of this information has contributed to achieving improvements.

We found that most forces have a process in place to report the outcomes of fraud cases. Many forces have invested in staff to make sure that these reports are accurate. We were told that, now that there is an increased focus on monitoring outcomes, monthly returns by forces have improved. City of London Police told us that compliance rates by forces increased from 40 percent in 2018/19 to 87 percent in 2020/21.

While full compliance has not yet been achieved, we are satisfied that forces have processes in place to provide the NFIB with updates on outcomes of investigations.

### This recommendation has been implemented.

### **Recommendation 3**

In our 2019 report, we made the following recommendation:

By 31 August 2019, the Economic Crime Strategic Board should extend its remit to include all forms of fraud against individuals and businesses, not just serious and organised fraud.

In our previous report, we discussed the Economic Crime Strategic Board (ECSB). In relation to fraud, money laundering and other forms of economic crime, its remit is to "set priorities, direct resources and scrutinise performance against the economic crime threat, which is set out in the Serious and Organised Crime (SOC) Strategy".

<sup>&</sup>lt;sup>9</sup> New taskforce to tackle economic crime, UK Government, 14 January 2019.

We recommended that this should be extended to all forms of fraud.

Our 2021 inspection found that the ECSB met for the second time in July 2019. A further meeting scheduled to take place in January 2020 did not occur. The board subsequently met again on 17 February 2021 when, we were told, it expanded its discussion to include all aspects of fraud. An agenda item at this meeting was to discuss an overarching fraud strategy. The ECSB approved the framework for a fraud action plan and committed to work together to better inform the fraud intelligence picture.

The board has two sub-groups: the Economic Crime Delivery Board and the Public Private Sector Group. Members of the ECSB told us that both sub-groups have also extended their remit to include all types of fraud.

We are pleased to see that the board's remit, for all practical purposes, includes all types of fraud.

### This recommendation has been implemented.

As encouraging as this is, we were told that implementation of this recommendation is insufficient on its own to increase the priority given to fraud. The ECSB's extended remit needs to be supported by the allocation of resources. As one interviewee said: "anything which gets volume [fraud], and fraud against individuals, up the agenda is a good thing, but alone this recommendation isn't enough."

### **Recommendation 4**

In our 2019 report, we made the following recommendation:

By 30 September 2019, the Home Office should publish information concerning its agreement with City of London Police to act as the national lead force for fraud. The published information should include (as a minimum) descriptions of:

- the aims and objectives of the agreement;
- the funding arrangement;
- accountability and governance processes; and
- City of London Police's performance against the agreement.

In our previous inspection, we found that the lack of a published agreement for City of London Police to act as the lead force for fraud was unhelpful. We drew particular attention to the short-term way that the force's funding is set, which inhibits long-term planning and investment.

In response to our recommendation, the Home Office has published its agreement with City of London Police.

### This recommendation has been implemented.

While the agreement gives clarity on the funding that City of London Police has to fulfil its responsibilities as lead force for fraud, the problems identified in our previous inspection remain. The current funding arrangements make long-term planning

extremely difficult. An example of this is the project to design and implement a new NFIB intelligence system, the funding for which remains uncertain.

We acknowledge that the Home Office intends to agree longer-term funding for City of London Police. However, the delay to the publication of the Government's planned three-year Comprehensive Spending Review has prevented this.

### **Recommendation 5**

In our 2019 report, we made the following recommendation:

The National Police Chiefs' Council (NPCC) Coordinator for Economic Crime, in consultation with the Home Office and the Director General of the National Economic Crime Centre, should develop a national policing strategy for fraud and, by 31 March 2020, secure its approval by the NPCC for adoption by all police forces. The strategy should:

- make clear the roles and responsibilities of police forces and regional organised crime units;
- define the relationship between City of London Police as the national lead force, the National Crime Agency (in particular the National Economic Crime Centre) and other relevant bodies, seeking to ensure that their respective roles and responsibilities complement each other and avoid duplication; and
- define how fraud intelligence will be developed, disseminated and put to effective use by police forces and the National Fraud Intelligence Bureau.

The implementation arrangements for the strategy should include clear communication and review processes.

Our previous inspection identified the need for a national policing strategy for tackling fraud.

In response to this recommendation, the NPCC Coordinator for Economic Crime produced and published the *National Fraud Policing Strategy 2019-2022*. In October 2019, it was presented to the NPCC where it received the support of chief constables. The strategy is published on the City of London Police website.

The NPCC Coordinator for Economic Crime has developed an implementation plan and an economic crime delivery plan. These track and monitor the implementation of the strategy.

Following its adoption by the NPCC, City of London Police has held a series of regional strategic briefings. Police and crime commissioners were included to aid understanding and inform local police and crime plans.

We found consistent evidence during our inspection that the strategy is well regarded by law enforcement. It clarifies the roles and responsibilities of City of London Police, local forces, the NCA, and other organisations involved with policing fraud, and defines the relationships between them. We found that fraud is now given a higher priority. It appears in the control strategy of many forces. There was a consistent view among interviewees that it should be included in the Strategic Policing Requirement.

But we also heard that the national strategy could be clearer in setting out how intelligence should be developed and disseminated. We were told that work is due to start on reviewing the strategy later this year, and we would expect this lack of clarity to be resolved then.

### This recommendation has been implemented.

The development of a new national policing strategy for fraud has increased the priority given to fraud nationally and laid the foundations for continued improvement. But some felt that its effect has been limited. The low level of resources allocated to fraud, and the lack of government resources to support implementation of the strategy, are seen as blockages to progress.

### **Recommendation 6**

In our 2019 report, we made the following recommendation:

With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime, working with the College of Policing, should take responsibility for identifying, evaluating and disseminating best practice advice on the police response to fraud.

During our previous inspection, we looked for a clear process for fraud-related best practice. Instead, we found initiatives that fell short of a structured, methodical and co-ordinated approach. Our recommendation was intended to improve this situation.

Our 2021 inspection found that little progress has been made against this recommendation. We found no evidence of a nationally co-ordinated and consistent process for identifying, evaluating and disseminating best practice advice on the police response to fraud. We still believe that this is important in raising standards.

In the absence of a national structure, there is a growing network of local and regional groups where best practice is discussed. But, in the main, these groups tend to operate in isolation.

The <u>Knowledge Hub</u> is a potential forum for publishing best practice. We found that, in respect of fraud, it lacks information, is under-utilised and there is no guidance available for its use.

Regional fraud development officers have been introduced to develop links between forces and regions, and they provide another opportunity. Many interviewees spoke highly of the benefits this role has brought to tackling fraud, which we found encouraging.

This recommendation is jointly owned by the NPCC Coordinator and the College of Policing. We found little evidence of these two bodies working together to implement it.

This recommendation has not been implemented.

### **Recommendation 7**

In our 2019 report, we made the following recommendation:

By 31 March 2020, the National Police Chiefs' Council Coordinator for Economic Crime should carry out an evaluation of two National Fraud Intelligence Bureau products: monthly victim lists and six-monthly force profiles. The evaluation should include:

- consulting with police forces to establish the uses to which these intelligence products are put; and
- identifying any opportunities to improve the products' utility or reduce the burden on the National Fraud Intelligence Bureau in compiling them.

During our previous inspection, we found that forces needed to make better use of the six-monthly fraud profiles from the NFIB. We also heard that the content included in these profiles, and the fact they were produced relatively infrequently, made them less helpful. This meant that forces didn't have a full picture of the threat from fraud, and what was required to combat it. We also found that the information supplied by the NFIB to identify and support vulnerable victims of fraud was not used effectively.

Following our recommendation, City of London Police evaluated both the profiles and the victim lists, in consultation with forces. The six-monthly force profiles were replaced by an online interactive dashboard. This provides accurate up-to-date information to help forces understand how much, and what type of, fraud is in their area. City of London Police also introduced an annual national intelligence assessment of the fraud and cyber threat. This includes information that allows forces to compare national, regional and local threats based on crime data.

The NFIB has changed how it distributes victim lists. The lists now include all victim data and are sent to forces each week.

We were pleased to find that these new and revised sources of information are being used to good effect. Forces told us that they allow vulnerable victims to be identified more quickly. They also contribute to a more detailed understanding of fraud.

This recommendation has been implemented.

### **Recommendation 8**

In our 2019 report, we made the following recommendation:

By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces on how to:

accurately record and report on National Fraud Intelligence Bureau
 'disseminations for enforcement' to ensure consistency and clarity for fraudrecording processes (the guidance should reassert the requirement in the
Home Office Counting Rules for forces to provide the case number, the
crime numbers, the suspect details and the outcome details for each such
dissemination);

- determine their response to National Fraud Intelligence Bureau disseminations for enforcement, ensuring consistency and clarity for victims of fraud; and
- ensure that, when a force decides not to investigate, or not to continue an investigation, the victim is provided with a clear written explanation of the rationale for that decision.

The NFIB sends reports of fraud to police forces for them to consider investigating. These are known as 'disseminations for enforcement'. Our previous inspection found that the way forces recorded these was not clear or consistent enough. We also found inconsistencies in the way that different forces made decisions about whether to investigate those reports. Our recommendation sought to address this.

In September 2019, the NPCC Coordinator issued guidance to all forces covering each of the points in our recommendation. We heard that the guidance was developed with forces to make sure that it was fit for purpose.

We were pleased to see that all the forces we visited had acted upon the guidance to improve their investigations and their service to victims. Forces told us that they found it helpful to have clarity on what is expected for fraud offences.

This recommendation has been implemented.

### **Recommendation 9**

In our 2019 report, we made the following recommendation:

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

In our previous inspection, we recommended that forces should publish their policies for responding to and investigating fraud. The aim of this recommendation was to make it clear to victims what they can expect when they report a fraud.

All the forces we visited have a fraud policy, although some are overdue for review. We found that many specialist fraud investigators have a good knowledge of their force's fraud policy and apply it to their investigations. Among call handlers and non-specialist investigators, this is not always the case. There is often a lack of awareness of the policy and its application to their work.

We reviewed all 43 forces' websites and found that only 24 have published their policy. Of those 24, we rated 14 either difficult or very difficult to find – and we knew what we were looking for. Members of the public are likely to find it even harder.

While some forces have published clear information telling victims what service they will receive when reporting a fraud, many have not. We would urge all forces to do so.

This recommendation has been partially implemented.

### **Recommendation 10**

In our 2019 report, we made the following recommendation:

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

Our previous inspection found that the NFIB, with others, developed advice, campaigns and alerts to provide consistent national messages. Forces and regions used these as part of their fraud protection advice. We found that, once advice or alerts were issued, there was very little effort to find out how effective they were.

Our 2021 inspection found that some advice given to the public is now being evaluated. But this is often limited to data collected for larger campaigns – for instance, the number of impressions on social media; the level of national and regional media coverage; and the number of forces publicly supporting the campaign. The effectiveness of fraud protection advice is still rarely evaluated.

We were told that City of London Police will be working with the NECC and the Home Office to improve the evaluation of the effectiveness of fraud protection advice.

This recommendation has not been implemented.

### **Recommendation 11**

In our 2019 report, we made the following recommendation:

By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces in relation to fraud-related calls for service as described in the Home Office Counting Rules. The advice should make clear to forces the circumstances in which they are expected to intervene and the circumstances in which they may refer the case direct to Action Fraud. The advice should also make clear how:

- responses to reports of fraud may adequately meet the needs of victims;
- vulnerable victims should be identified and dealt with appropriately; and
- reports of fraud should be efficiently referred to Action Fraud.

In most cases, reports of fraud should be made directly to Action Fraud. Police forces are expected to intervene in cases where an offender is arrested by police, an offence is being committed at the time of the call, or there is a local suspect. These are defined as calls for service, and our previous inspection found that the response to them was inconsistent. Some forces believed that the vulnerability of the victim should be factored into deciding whether a report qualifies as a call for service. This is not the case.

In response to our recommendation, the NPCC Coordinator issued guidance after consultation with forces. This describes the actions to be taken by forces when they

receive a fraud-related call for service. The guidance also makes clear how to respond when a vulnerable victim is identified.

Some forces have written the guidance into the automated systems used by their call handlers. The <u>Economic Crime Academy</u> includes the guidance in its training to fraud investigators.

### This recommendation has been implemented.

We acknowledge that the guidance has been provided and this recommendation has been met. But we found that confusion still arises. We believe the next important step is for forces to make sure that they comply with this guidance to improve the consistency of service to victims of fraud.

We also found that too few forces have processes for checking that the guidance is being followed. In some cases, particularly where callers are referred directly to Action Fraud, no record is made on force systems. This means that those forces are unable to check that these calls are being dealt with correctly.

### Recommendation 1

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

### **Recommendation 12**

In our 2019 report, we made the following recommendation:

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

The NFIB sends cases or collections of cases to forces for them to consider investigating. These are called 'disseminations'. During our previous inspection, we were told that the NFIB disseminations were not easily understood, poor quality, and often contained inaccurate or out-of-date information. Our recommendation sought to improve their quality.

As a result of our recommendation, City of London Police consulted with forces and ROCUs. Following this, amendments were made to the documentation and a new dissemination template was introduced.

During our 2021 inspection, we compared examples of the old and new disseminations. We found that the new forms are easier to read and interpret. We also heard this from interviewees. But there is more to be done.

To address this, City of London Police intends to seek feedback on the NFIB dissemination documents from recipients and through a national user group.

This recommendation has been implemented.

### **Recommendation 13**

In our 2019 report, we made the following recommendation:

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

Our previous inspection found that regional and national tasking and co-ordination groups were not generally used for fraud cases. The absence of an effective tasking process led to forces being inappropriately responsible for some investigations, especially major cases involving cross-border or national criminality. We were told about large-scale fraud cases 'bouncing around' between organisations, because nobody would take responsibility for deciding what should happen to them.

Our report outlined that City of London Police, as the lead force for fraud, has no 'tasking' authority, unlike the NCA, which has the power to direct forces. At the time of our inspection, the NECC was being created. One of its aims is to improve the co-ordination and tasking of the UK's response to economic crime. We made this recommendation to make sure that fraud investigations are allocated to the most appropriate force, ROCU or organisation, such as the NCA.

Our 2021 inspection heard that the NCA's 'powers to direct' have been used for fraud, although not often, but are not well understood by forces. We also heard that the NECC does not currently have a tasking or prioritisation process for fraud investigations. There still seems to be a problem with forces being inappropriately responsible for major cases and some fraud cases 'bouncing around'.

We heard that the NFIB allocates Action Fraud cases to forces; the NECC provides guidance and support to forces; and there is a tasking process for serious and organised crime. While not operating in isolation, these processes aren't automatically linked, although we understand this is the ambition.

We were told that the NECC is working with City of London Police to reform the way fraud is categorised, recorded and allocated. This will include tasking and prioritising the most serious fraud cases. This is intended to help make sure that cases are investigated by the right people with the right skills. This initiative is in an early stage of development and is being trialled.

An efficient and effective tasking system is still needed. But we recognise that a process relying solely on the tasking powers of the NCA may not be the most effective way of achieving this.

Our recommendation predated the establishment of the NECC. Its growth in influence now provides a better platform to prioritise fraud investigations.

### This recommendation is no longer relevant.

Instead, and to support the work that is already taking place, we make a new recommendation.

### Recommendation 2

By 31 March 2022, the National Police Chiefs' Council Coordinator for Economic Crime with the National Crime Agency, National Economic Crime Centre and City of London Police, should set up an effective national tasking and co-ordination process for fraud.

### **Recommendation 14**

In our 2019 report, we made the following recommendation:

With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should:

- carry out (and subsequently evaluate) a campaign to raise the public awareness of the existence and role of Action Fraud; and
- provide chief constables with a description of the role of Action Fraud for uploading to force websites.

In our 2019 report, we noted the lack of public awareness of Action Fraud. This was identified as the main reason why victims didn't report fraud.

In our 2021 inspection, we found that Action Fraud has conducted a national awareness campaign. This has included advertising on national radio stations and at televised sporting events, and a media campaign to raise awareness of courier fraud. An evaluation by City of London Police showed increased contact with Action Fraud via its website and social media channels.

City of London Police told us that there continues to be a degree of misunderstanding around the remit of Action Fraud. The force has established a steering committee to address this and have a communications plan to further raise public awareness.

As a result of this recommendation, all forces were sent a detailed description of the role of Action Fraud. Some, but not all, have added this to their website, though all 43 forces link to Action Fraud's website where a description of its role can be found.

This recommendation has been implemented.

### **Recommendation 15**

In our 2019 report, we made the following recommendation:

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

For most victims, the official way to report fraud is to Action Fraud. We said in our previous report that lengthy waiting times and the high proportion of people hanging

up before their call is answered, or not completing an online report when trying to contact Action Fraud, indicated that the process is both inefficient and ineffective.

During the year ending March 2018, the average monthly proportion of calls where the caller hung up before their call was answered ('abandonment rate') was 37 percent. The average call waiting time was 13 minutes 40 seconds. During the same period, 195,537 online reports were started but not completed, an abandonment rate of 44 percent.

At that time, Action Fraud didn't publish its call and online data. We recommended that it should have clear indicators and regularly publish details of how it performs against them.

In our 2021 inspection, we found that some performance indicators had been set. Information is published for answering calls, call handling, call abandonment rates and victim satisfaction levels. But we would urge the NPCC Coordinator to include information on how many online reports are abandoned.

Performance information is published on Action Fraud's website, but the relevant page is not easy to find.

While comparing call volumes during the pandemic is difficult, Action Fraud's data showed that performance has not improved since our last inspection. The average call waiting time and abandonment rate remain too high.

Progress has been made with this recommendation. But further work is needed to make sure that the performance indicators and data, including online reporting abandonment rates, are published and easily accessible.

This recommendation has been partially implemented.

### **Recommendation 16**

In our 2019 report, we made the following recommendation:

By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should provide guidance to Action Fraud and chief constables. This is to ensure that, promptly on reporting a fraud, victims are provided with explanations of:

- the role of Action Fraud;
- the process by which their fraud report will be considered for assessment or referral to the police (or other law enforcement agency) by the National Fraud Intelligence Bureau;
- how to obtain an update on the progress of their case;
- how, following referral from the National Fraud Intelligence Bureau, the decision on whether and how to investigate rests with the police (or other law enforcement agency); and
- the options open to victims of fraud to seek civil redress as an alternative (in cases where criminal investigations are not carried out or do not lead to convictions).

Our previous report noted the importance of victims having realistic expectations of the service that Action Fraud and police forces can provide. In making this recommendation, our intention was to make sure that victims are given clear, concise, accurate and timely information.

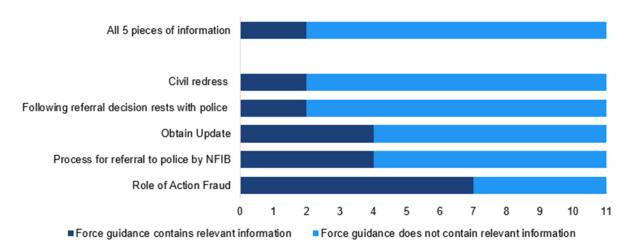
Our 2021 inspection has found that the NPCC Coordinator for Economic Crime has circulated guidance to Action Fraud and all forces outlining all the information we recommended. We were also pleased to see that this guidance has since been reviewed. The review has led to further guidance being given about what information the letters sent to victims should include.

### This recommendation has been implemented.

However, it was frustrating to hear that, despite this work, some interviewees we spoke to weren't aware of the guidance.

In the 11 forces we inspected, we conducted a review of the information available to call handlers. We were looking to see whether victims were given the five specific pieces of information contained in our recommendation. Information about the role of Action Fraud was included by seven forces. But only two forces included all five pieces of information.

Figure 1: Forces where call handlers' guidance contained relevant information



We also examined the letters sent to victims by the same 11 forces and Action Fraud. The results were similar: most forces didn't include the necessary information. Only letters sent by Action Fraud contained all five pieces of information.

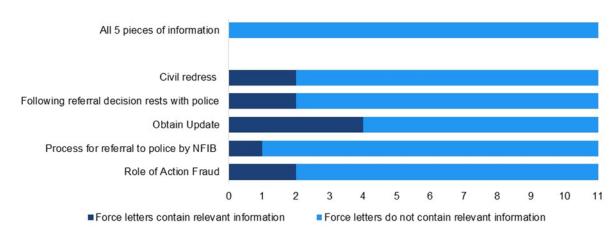


Figure 2: Forces where victim letters contained relevant information

It is clear that the guidance has not been adopted fully and that forces need to do more to make sure that their staff are aware of it and understand it. Our reviews of call handler guidance and letters sent by forces indicate that only a small proportion of the information is being given to victims. The intention behind the original recommendation has not been achieved. More needs to be done to make sure that victims receive all the relevant information when reporting fraud.

We are making a further recommendation. Recirculation by the NPCC Coordinator of the guidance and of the sample victim letters would support this.

### **Recommendation 3**

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

# Progress against areas for improvement

Of the five AFIs we gave in our 2019 report, we consider that one has been dealt with fully and there has been progress on three. One remains outstanding, with little evidence of any meaningful progress.

### **Area for improvement 1**

In our 2019 report, we identified the following area for improvement:

To make improvements in this area, chief constables should improve the way their force uses the National Fraud Intelligence Bureau monthly victim lists to identify and support vulnerable victims and others who require additional support.

The NFIB sends to each force the details of all victims who reside in their area and have reported a crime to Action Fraud. Our previous inspection found that forces did not use these lists effectively to protect people who may be at increased risk.

Earlier in this report (see Recommendation 7), we noted the redesign of the NFIB products and the change from monthly to weekly distribution.

We found that forces have made improvements to the way they use this product. There is a clear focus on using the lists to identify people who are vulnerable and to take action to mitigate risk. Interviewees told us that the change to a weekly product allowed them to intervene more promptly. This has resulted in an improved service to victims.

This area for improvement has been implemented.

### **Area for improvement 2**

In our 2019 report, we identified the following area for improvement:

To make improvements in this area, chief constables should ensure that their force improves the identification and mapping of organised crime groups in which the principal criminality is fraud.

Our previous inspection reported that, to succeed in disrupting and investigating serious and organised crime, forces must clearly understand the threat. They should map organised crime groups (OCGs) accurately, which will help to prioritise activity against them. We found evidence that OCGs whose criminal activity was primarily fraud weren't being mapped effectively. At that time, only 2 of the 11 forces we inspected routinely identified and mapped them.

During our 2021 inspection, most of the 11 forces we inspected told us that they have now improved the mapping of OCGs for fraud. But we were also told that the mapping process isn't as effective as it could be. This is because <a href="Management of Risk in Law Enforcement (MoRiLE)">Management of Risk in Law Enforcement (MoRiLE)</a> scoring, which the mapping process uses, doesn't effectively take account of the gravity of fraud offending.

Some forces told us they have adapted MoRiLE in order to better reflect the threat, harm and risk posed by fraud and its effect on victims. Further testing in relation to fraud cases, and greater use and awareness of MoRiLE at an operational level, may be of benefit. Identification of fraud-related OCGs has also been helped by the introduction of Regional Organised Crime Threat Assessment Teams (ROCTAs), regional teams that assess, manage and understand the threat and risk from serious and organised crime.

City of London Police told us they are currently working with British Transport Police and the Metropolitan Police to develop a new OCG mapping process. This will be managed through the new London ROCTA. We welcome such initiatives. If successful, our expectation is that these will be introduced in other regions.

Since we completed our fieldwork, we have been told that the NCA's fraud intelligence team identifies high-harm fraudsters for further investigation. This will be enhanced by work that the NECC is leading to develop a multi-agency capability to identify fraud OCGs. This is expected to be in place later this year.

The Economic Crime Policing Board brings together senior officers from each region and other national agencies that are responsible for investigating economic crime, including fraud. The board has a delivery plan, which we reviewed. It shows that, in many regions, this AFI has not yet been fully implemented. While the progress that we've heard about is encouraging, it's clear that some areas are more advanced than others. More needs to be done to improve the way fraud-related OCGs are identified and mapped.

This area for improvement has been partially implemented.

### **Area for improvement 3**

In our 2019 report, we identified the following area for improvement:

To make improvements in this area, chief constables should ensure that fraudsters are included among those considered for serious organised crime 'prevent' tactics, including by local strategic partnership boards and through integrated offender management processes.

During our previous inspection, we found no evidence that fraudsters were routinely being identified for <u>integrated offender management</u>. Proactive targeting or profiling was rare. We also found very little activity to stop people from becoming involved in fraud or committing further offences (Prevent).

Our 2021 inspection found that the use of Prevent tactics is limited and inconsistent. One ROCU has developed a regional fraud adviser role to protect individuals and businesses from criminality (Protect). Some forces have officers who work with young people to prevent fraud. But we were told that there is little investment and not enough

resources dedicated to fraud. In contrast, cyber-crime has government-funded officers for both Prevent and Protect work. Having equivalent roles for fraud would place greater emphasis on protecting the public from becoming victims of fraud.

Lifetime offender management can help criminals to adjust their lifestyles through monitoring and restrictions. We heard evidence that some forces have started to establish processes for this, but not all. Others have developed links with Trading Standards and the National Probation Service to improve their Prevent activity.

While progress on this AFI is encouraging, it isn't consistent. The amount of activity is low. We were told that not enough proactive policing is done to prevent fraud, and that opportunities to disrupt criminality and prevent further offending are being missed. Further work is needed to develop the use of Prevent tactics in relation to fraud.

### This area for improvement has been partially implemented.

### Area for improvement 4

In our 2019 report, we identified the following area for improvement:

To make improvements in this area, chief constables should increase their force's use of ancillary orders against fraudsters.

A range of 'ancillary orders' are available to law enforcement to support the management of serious offenders. These orders are imposed by the courts, following conviction, to prevent and deter further crime by restricting movement, limiting activities, and recovering or freezing assets. In our previous inspection, we found little evidence that these were being used in fraud cases.

Our 2021 inspection found that some improvements have been made in the use of ancillary orders in fraud cases. In one force, we were told that creating a Lifetime Offender Management Unit has led to an increase in the use of orders.

But this isn't the case in every force and ROCU. We found that there is a lack of knowledge about ancillary orders among staff. We heard that training is available, but take-up remains low. There is a perception that applying for ancillary orders is the responsibility of specialists.

We were told that the complexity of meeting the strict requirements for <u>Serious Crime Prevention Orders</u> limits the number that are issued. In some cases, the difficulty of providing assurance that any breach of the order would be enforced – for example, because the offender lives in a different force area from the victim – has led to problems obtaining the order.

While progress has been made, there is more to do. Some forces and regions are more advanced than others. There are still blockages to the obtaining of ancillary orders, and we encourage greater emphasis on using such orders for fraud offences to inhibit the actions of fraudsters.

This area for improvement has been partially implemented.

### **Area for improvement 5**

In our 2019 report, we identified the following area for improvement:

To make improvements in this area, chief constables should ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.

Our previous inspection found that not all forces adhered to the <u>Code of Practice</u> <u>for Victims of Crime</u>. More commonly referred to as the 'Victims' Code', this sets out the rights that victims of crime are entitled to. We noted that in cases of fraud involving multiple victims, compliance with the Code was difficult. We also found considerable delays. Some victims waited months before being told what would happen with their case.

Since our last inspection, the Code of Practice has been revised. The 2020 version says:

Where there is a high number of victims involved in a case, such as large-scale investment frauds with multiple investor victims, or in other exceptional cases, the service provider may communicate information that a victim has the Right to under this Code through alternative channels, such as their website, rather than contacting each victim individually.

During our 2021 inspection, some investigators told us that they are still struggling to communicate with multiple victims in fraud cases, and that they can't comply with the Code. Some said that their force's crime management systems don't allow for multiple victims and it is time-consuming to provide such updates to each victim separately. This indicates a lack of awareness that the Code allows police to communicate with multiple victims collectively in some cases.

We encourage the NPCC Coordinator for Economic Crime to give guidance to forces about compliance with the Code in fraud cases with multiple victims.

We were told that there are still delays in allocating cases for investigation, and some victims are still waiting too long to be told what is happening with their case. The Economic Crime Policing Board delivery plan (March 2021) outlines that almost half the regions have further work to do to implement this AFI.

This area for improvement has not been implemented.

# Conclusion

The scale of fraud has not diminished. The detrimental effect it has on society, business, the UK economy, and, most importantly, individuals' lives is as great today as it has ever been.

No one disputes this. Yet fraud continues to be treated as a low-priority crime, a victimless crime, or a crime that doesn't cause the harm that is recognised in other types of crime. In this report, we have made clear that fraud, and reducing its effects on victims, needs to become more of a priority.

Since our inspection in 2018, the NPCC Coordinator for Economic Crime and others, who are responsible for leading the response to tackling fraud, have tried to make meaningful improvements. Other senior leaders have supported this, and there are without doubt pockets of good work and innovation. All these are to be commended, especially at a time where difficult choices need to be made about policing priorities.

We have seen highly committed people at all levels in the police service striving to improve how fraud is dealt with. This dedication has impressed us. But more support and investment are essential to make the changes that are needed.

Sadly, far too many crimes of fraud continue to be committed. There are too few examples of the police and other agencies coming together to prevent and protect the public from fraud; there are far too few officers working on it; there are far too few investigations into it; and there are far too few criminals brought to justice.

All this leads to far too few victims receiving the service, and the justice, they want and are entitled to expect.

In 2019, we reported on a range of problems with how the system works. To support the police service, we made a series of 16 recommendations and found 5 AFIs. It is regrettable that some of these are still not implemented in any meaningful way or have only partially progressed. In some cases, even those that we accept as having been implemented have not led to the kind of improvements we and the public might reasonably expect.

The NFIB's information technology system is still not fit for purpose, some processes are still poorly understood in forces, and far too many victims still receive a poor service. Accessing the service provided by Action Fraud, the national fraud reporting centre, is difficult and too many people give up rather than keep trying. This does not reflect on individuals but rather the system and the lack of investment in it.

Consequently, we have made three new recommendations. We urge the NPCC Coordinator for Economic Crime, along with other interested parties including the Government and chief constables, to implement all our outstanding and new recommendations.

Our recommendations are made to improve the police response to fraud. But to see wider change requires the commitment and focus of the Government, the police service, and other interested parties, including the private sector. A greater and more sustained effort is required.

Only then will we see reductions in the amount of fraud offences, the number of victims, the number of offenders who are benefitting from fraud, and in the harm it causes to us all.

# Definitions and interpretations

In this report, the following words, phrases, and expressions in the left-hand column have the meanings assigned to them in the right-hand column. Sometimes, the definition will be followed by a fuller explanation of the matter in question, with references to sources and other material that may be of assistance to the reader.

Term	Definition
Action Fraud	United Kingdom's national fraud and cyber-crime reporting centre, providing a central point of contact for information about fraud and cyber-crime.
Call for service	in the case of fraud, the Home Office Counting Rules define the circumstances that should be treated as a call for service. These are "offenders are arrested by police; or there is a call for service to the police and the offender is committing or has recently committed at the time of the call for service; or there is a local suspect".
Control strategy	document created by a police force that details how it plans to deal with the main threats and risks it has identified.
Code of Practice for Victims of Crime	statutory code of practice issued by the Secretary of State for Justice under section 32 of the Domestic Violence, Crime and Victims Act 2004; establishes minimum standards on the rights, support, and protection of victims of crime. Commonly referred to as Victim's Code of Practice (VCOP).
College of Policing	professional body for policing in England and Wales established in 2012 to provide those working in policing with the skills and knowledge necessary to prevent crime, protect the public and secure public trust.
Control strategy	document created by a police force that details how it plans to deal with the main threats and risks it has identified.
Economic Crime Academy	centre of excellence for training the wider economic crime community provided by City of London Police as the national policing lead for fraud.

Term	Definition
Economic Crime Strategic Board	a government taskforce, jointly chaired by the Home Secretary and the Chancellor of the Exchequer, to bring together leaders from across government and the financial sector.
Home Office Counting Rules (HOCR)	provide a national standard for the recording and counting of 'notifiable' offences recorded by police forces in England and Wales (known as 'recorded crime').
Integrated Offender Management (IOM)	management of the most persistent and problematic offenders by police and partner agencies working together
Knowledge Hub	has been created for UK policing and its public and select private sector partners, to help them share information, discuss ideas and opportunities, and encourage greater collaboration.
Management of Risk in Law Enforcement (MoRiLE)	process designed to assist law enforcement agencies to use a standardised assessment to assist decision makers in identifying and prioritising threat, risk and harm. Its use complements the National Intelligence Model (NIM) and National Decision Model (NDM), and links threat, risk and harm assessments to organisational capacity and capability.
National Crime Agency (NCA)	non-ministerial government department established under the Crime and Courts Act 2013 as an operational crime-fighting agency with responsibility for leading national efforts to tackle serious and organised crime.
National Economic Crime Centre (NECC)	brings together law enforcement and justice agencies, government departments, regulatory bodies and the private sector with a shared objective of driving down serious organised economic crime, protecting the public and safeguarding the prosperity and reputation of the UK as a financial centre.
National Fraud Intelligence Bureau (NFIB)	part of City of London Police, processes the information received by Action Fraud along with information supplied by other organisations, such as Cifas and UK Finance.
National Police Chiefs' Council (NPCC)	organisation that brings together 43 operationally independent and locally accountable chief constables and their chief officer teams to co-ordinate national operational policing.

Term	Definition
Organised crime group (OCG)	criminals working together and involved in planning, co-ordinating and committing serious crime on a continuing basis.
Organised Crime Group Mapping (OCGM)	standardised method of assessing the risks that OCGs present to communities and prioritising activity against them.
Regional Organised Crime Unit (ROCU)	operational police unit endowed with regional jurisdiction and specialist capabilities to disrupt and dismantle organised crime units; officers and police staff are normally seconded to ROCUs from forces within the region.
Serious and organised crime (SOC)	serious offences (defined by the Serious and Organised Crime Act 2015) that are planned, coordinated, and conducted by people working together on a continuing basis and whose motivation is often, but not always, financial gain.
Serious Crime Prevention Order (SCPO)	court order issued in accordance with the Serious Crime Act 2007 to protect the public by preventing, restricting, or disrupting a person's involvement in serious crime.
Strategic Policing Requirement (SPR)	document published by the Government that sets out the responsibility that local forces have for addressing national-level policing issues.
Victims' Code of Practice (VCOP)	See Code of Practice for Victims of Crime.

# Annex A – Forces and regional organised crime units inspected

### **Forces**

- City of London Police
- Cambridgeshire Constabulary
- Dorset Police
- Gwent Police
- Lancashire Constabulary
- Metropolitan Police Service
- Northumbria Police
- Nottinghamshire Police
- South Yorkshire Police
- Thames Valley Police
- West Mercia Police

### Regional organised crime units

- Eastern Region Special Operations Unit
- East Midlands Special Operations Unit
- North East Regional Special Operations Unit
- Regional Organised Crime Unit for the West Midlands Region
- South East Regional Organised Crime Unit
- South West Regional Organised Crime Unit
- Tarian Regional Organised Crime Unit (Southern Wales)
- North West Regional Organised Crime Unit
- Yorkshire and Humber Regional Organised Crime Unit

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