National Policing Fraud “Protect” Strategy

Draft prepared by the National Police Coordinator for Economic Crime V2.1 February 2015
PROTECTING THE COMMUNITY FROM FRAUD

**Introduction:** This is the draft National Policing Fraud ‘Protect’ Strategy produced by the National Police Coordinator for Economic Crime (NPCEC). We are developing this through the Crime Business Area in consultation with chief police officers and their staff. It is part of the national policing strategy for fraud and is designed to support chief officers in delivering crime prevention aimed at reducing the impact of fraud in their communities. It builds upon existing crime prevention resources and best practice whilst recognising that some additional response is required. This document is best read in the context of the National Policing Fraud Strategy.

**Strategy Aim:** The aim of this strategy is to reduce the impact of fraud; reducing the volume of crime, the value of the losses incurred and the wider impact on the quality of life for individual victims. It will do this **by:**

- Putting in place a National Economic Crime Prevention Centre.
- Establishing a National Fraud Prevention Network
- Integrating ‘protect’ activity within the overall strategy for the policing of fraud under the National Police Coordinator

We will use the above structure to deliver:

- An enhanced threat picture
- Empowerment of individuals and organisations to protect themselves
- Designed-in fraud protection
- Engagement of the volunteering community

We will seek to have fraud and cyber crime prevention ‘designed in’ to the technology and processes employed by individuals and organisations and will work with business and academia on this. To encourage business engagement in this we will explore, with partners, including government, how best to ensure that companies take all appropriate and reasonable steps to prevent crime and protect personal data in their possession.

**The Case for Prevention:** The National Fraud Authority’s Annual Fraud Indicator for 2013 put loss to the UK economy from fraud at £52 billion, equating to £1,441 per UK adult. Within this the cost of cyber enabled fraud is conservatively estimated at some £670m, with all these figures subject to extensive under-reporting. These figures serve to set crime prevention in context but there is also a more fundamental argument as to why greater investment needs to be made in protecting the public from fraud. Nationally, we are taking comfort and reassurance from falls in recorded crime but the rising level of fraud, not currently visible to the public, threatens to pose a serious threat to public confidence and the credibility of the police. Not only is this crime rising but in its current volumes it cannot be satisfactorily dealt with by the police, its volume needs to be kept at a manageable level – by crime prevention. Furthermore, the first obligation of the police is to prevent crime and given that much, if not most, fraud relies on some degree of participation by the victim this holds particularly true for this crime type. If policing can change risk behaviours by giving the right information to the right people at the right time by the right
means it can help individuals and organisations avoid becoming victims of fraud. With its local engagement with communities and businesses and its existing crime prevention skills Policing is well placed to engage with people and communities in a two way dialogue delivering messages developed by or in conjunction with the Home Office and other partners. The prize is reduced fraud, a better service for victims and an increase in confidence in the police and government

**OUR RESPONSE**

**Vision** The prevention of fraud is a key strand of the National Fraud Strategy. The vision is to create the conditions in which crime prevention against fraud, particularly cyber enabled, mirrors the best aspects of ‘physical’ crime prevention. Industry will design in crime prevention into both process and technologies, individuals will be educated in, implement and take responsibility for their own crime prevention, the police will spot and advise on breaches of prevention and focus proactive effort where the threat is greatest and once a crime has occurred the response will repair the damage and restore security for vulnerable victims, victims will be offered reassurance and advice to avoid becoming repeat victims.

**Principles** This Protect strategy is based around a number of principles:

- **Intelligence Led and Evidence Based** In order to properly target the strategic and operational crime prevention activity Policing needs to develop and share a full and accurate intelligence picture locally and nationally. The Economic Crime Prevention Centre will therefore work with the National Fraud Intelligence Bureau (NFIB) and partners, particularly businesses, to ensure that it and the Fraud Prevention Network has access to the most comprehensive data-set possible on fraud, cyber and other key economic crimes. We will highlight the need to ensure comprehensive reporting of fraud using regulatory or legal obligation if necessary. Policing will use this intelligence to shape both national campaigns and to advise on and support local initiatives.

- **National Coordination with Local Delivery.** The first Peelian principle that the basic mission for which the police exists is to prevent crime applies as much to fraud as to any other crime type. Responsibility for protecting the local community from crime rests with the local police force, in this case supported through national resources and coordination. This local responsibility is not diminished by virtue of central reporting through Action Fraud. The principle to be followed is one of local delivery supported by national resources, support and coordination. Priorities will be set by Police and Crime Commissioners (PCCs) with their Chief Constables, informed in their decision-making by local threat profiles provided for them by NFIB

- **Police Duty of Care to Victims** There is a strong linkage between providing crime prevention and care for victims.
This is particularly true for fraud where repeat victimisation and the passing on between criminals of victims’ details are so prevalent. There should therefore be appropriate and tailored prevention advice available to victims at every stage of their journey.

- **Economy of Effort** We will use existing structures and resources where we can. Over the last decade Policing has established very effective engagement structures with every local authority, their communities and businesses - we will utilise these. There are also various sources of crime prevention advice available and a number of organisations producing such material, some funded by the Government. The Economic Crime Prevention Centre will work with all relevant partners on behalf of Policing and support the use of whatever crime prevention material most effectively meets the public need. Where it is appropriate to do so the Economic Crime Prevention Centre will produce prevention material, ensuring it has a ‘local flavour’, at other times it will support the communication of existing material through the Fraud Prevention Network or ensure that other sources of advice are suitably ‘signposted’.

**Delivery** The sections that follow outline the delivery mechanisms (national coordination, the centre and network) and the deliverables:

- An enhanced threat picture
- The empowerment of individuals and organisations to protect themselves
- Designed-in fraud protection
- Engagement of the volunteering community
THE DELIVERY MECHANISMS

**National Police Coordinator Economic Crime.** The ‘Protect’ Strategy is a key pillar of the overall policing strategy for fraud and as such its delivery will be led, on behalf of Policing, by the National Policing Coordinator Economic Crime. The coordinator will be supported, particularly for the crime prevention aspects of this strand, by the Economic Crime Prevention Centre and the Fraud Prevention Network.

**The Economic Crime Prevention Centre.** At the centre of the Fraud Prevention Network and coordinating delivery of crime prevention is the Economic Crime Prevention Centre (see Appendix 1 for further detail). This national resource is located in and administered by the City of London Police where it can best draw on the knowledge and expertise held in the NFIB, national and specialist fraud investigation teams and the Economic Crime Academy. The Centre will:

- Work with the NFIB using their national and local profiles to identify those threats and potential victims most likely to benefit from prevention interventions.
- Develop national prevention campaigns, working alongside police and other partners to do so.
- Produce prevention material when it is appropriate to do so.
- Source, collect and disseminate or signpost existing crime prevention material.
- Work with forces to agree local priorities, help design and support delivery of local crime prevention activities.
- Identify, collate and share best practice and advice.

**Fraud Prevention Network.** Crime prevention delivery will be facilitated through the Fraud Prevention Network. This harnesses existing police, local authority and other crime prevention resources and through membership of this network seeks to equip them for delivery of fraud related crime prevention including its cyber aspects. The Economic Crime Prevention Centre has a network as illustrated at Appendix 2 The Economic Crime Prevention Centre has identified specific points of contact (SPOCs) at force level, who in turn network into the general crime prevention resources and partnerships available to their force. In this way the network engages with organisations at both national and local level, the national and local chambers of commerce for example. The regional level SPOCs may include members of the Cyber Crime Prevention Network running in parallel to this. Advice on strategic threat priorities is provided through the Economic Crime Command Threat Group. The multi-sector Fraud Prevention Group advises on how best to meet the national and thematic threats. The Economic Crime Prevention Centre reports to, and may request support from, National Policing through the appropriate committee of senior police officers representing forces from across the country in this crime area (the Economic Crime Portfolio). The Economic Crime
Prevention Centre will work to support the National Policing Crime Prevention Business Area, acting as the economic crime prevention hub linking into a broader police crime prevention network. Governance is summarised at Appendix 2.
DELIVERABLES

Enhancing the Threat Picture. We will ensure that our ‘Protect’ activity is evidence based and intelligence led so as to have the best impact and make the most efficient use of resources. A key deliverable to achieve this is the development of an enhanced threat picture on which to base decisions on priorities and resourcing. It is crucial that we work with business, the public and government organisations to reduce the current levels of under-reporting of fraud (estimated by some experts to be around 80%) so as to be able to more accurately and comprehensively describe the scale and nature of the threat. Our grasp of the threat must develop beyond mere volume however and we will continue to work with government bodies, academia, industry and victim champions to develop a meaningful and practical understanding of both the victimology and the technological opportunities for fraud and countermeasures to it. Crucially, we must look ahead to identify emerging threats before they impact on society.

Empowering Individuals and Organisations to Protect Themselves. At the heart of our Protect strategy is the activity we will undertake to empower individuals and organisations to protect themselves. Unlike other, traditional, crimes no amount of visible police presence will reassure the public or deter criminals from committing fraud, particularly not cyber enabled fraud. The onus must therefore be on individuals and organisations to protect themselves, modifying those behaviours which make them particularly vulnerable to fraud and adopting those that will protect them. We will empower the community by making it aware of the threats and how they might mitigate them. Through the Economic Crime Prevention Centre and the Fraud Prevention Network we will deliver:

- A major national awareness campaign seeking to influence behaviours so that individuals and organisations protect themselves from fraud.
- An ongoing series of national and local campaigns addressing specific threats. These will be informed by the enhanced threat picture at national and local level.
- A central resource providing or sign-posting crime prevention resources and support to individuals and organisations.
- Support to victims and their champions by providing appropriate crime prevention advice or signposting victims to it. This will be conducted through Action Fraud on first contact and subsequently through the victim’s local force.

Encouraging the Designing in of Fraud Protect. Policing will work with government departments and industry to encourage the designing in to technology and processes appropriate measures to reduce the risk of fraud to themselves and the consumer. There is often a balance between security
and user convenience and this work is therefore likely to include exploring how customers might be helped to make informed choices based on their individual risk appetite.

Engaging the Volunteering Community. We have already been successful in harnessing the additional capacity and specialist capabilities to be found among volunteers in the community. A number of banks, for example, have allowed their staff to make themselves available to policing to provide technical advice on fraud techniques and counter-measures and we have launched a scheme to recruit and train Special Constables to support fraud victims. We will be exploring how we might engage more comprehensively with the community including scoping some form of ‘Cyber Watch’.

Appendices:

1. The Economic Crime Prevention Centre.
2. Fraud Prevention Network – Governance
Appendix 1

ECONOMIC CRIME PREVENTION CENTRE

City of London Police, as the National Lead Force for Fraud, aims to create the conditions in which crime prevention against fraud particularly cyber enabled, mirrors the best aspects of 'physical' crime prevention. It will act as the hub in a national hub and spoke model and develop relationships with industry, academia and other partners to strengthen fraud prevention.

The focus of the Economic Crime Prevention Centre will be to develop and share best practice across the police service, encourage industry to design in crime prevention (processes and technology), educate individuals and businesses so they implement and take responsibility for their own crime prevention and assist the third sector to repair the damage caused to victims, restore security and avoid repeat victimisation. The Economic Crime Prevention Centre will deliver this through the following:

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<tr>
<td>Local and national threat assessments and policing priorities</td>
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<td>Law enforcement and industry best practice and guidance</td>
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<td>Academic knowledge</td>
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<td>Existing crime prevention material</td>
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<td>Feedback from police forces</td>
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<td>Define and prioritise challenges and opportunities</td>
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<td>Develop and maintain a crime prevention network</td>
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<td>Develop partnerships and seek sponsorship</td>
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<td>Champion crime prevention</td>
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<td>Coordinate national prevention campaigns</td>
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<td>Use crime prevention resources in place for other crime types</td>
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<td>Contribute to evidence base of what works</td>
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<td>Structured problem solving approaches to fraud prevention</td>
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<td>National prevention strategy</td>
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<td>Generic and bespoke advice for crime prevention practitioners</td>
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<td>Prevention campaigns and materials</td>
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<td>Fraud prevention training</td>
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<td>Catalogue and sign-post prevention material</td>
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<td>Record and measurement of impact</td>
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DELIVERY MODEL

IMPLEMENTATION PLAN

To be implemented in three stages:

- Pilot, business case and initial build
- Formal launch
- Build to full capability

This pilot phase is already underway with a 7 region crime prevention roadshow currently underway. This has been coordinated and resourced by City of London Police using new and existing third party material to reach police officers, the general public and small business. Lessons learned will be fed into the development process.
The initial build will include:

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<td>Further development of the concept in conjunction with key stakeholders. Engagement is underway with ACPO leads for crime prevention, digital investigation and crime business area, with the Home Office ‘Protect’ strand and the identity theft prevention work stream. COLP are working with Victim Support to ensure the tone of messaging is appropriate to vulnerable victims in particular</td>
<td>Concept was confirmed on 17 October</td>
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<td>Design and implementation of the required internal systems and processes</td>
<td>Completed 3 November</td>
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<td>Mapping of existing crime prevention resources at local force and authority level. This has been completed and is attached for your information. COLP is now developing the engagement plan to connect these into a recognised network.</td>
<td>Mapped</td>
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<td>A statement of requirement and business case to resource the Economic Crime Prevention Centre and any key elements of the wider network currently missing.</td>
<td>Business case for the central team submitted</td>
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<td>Communications plan</td>
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<td>Designing, recruiting and developing the central team</td>
<td>In place by 1 Apr 2015</td>
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<td>A public launch of the Economic Crime Prevention Centre and its local network to raise awareness of the threat and the service put in place to help counter it. COLP will be seeking sponsorship for this event (and indeed ongoing prevention activity) but are aware of potential sensitivities around this</td>
<td>Intention to hold launch event Mar 2015 ‘Go Live’ 1 Apr 2015</td>
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<td>Following the launch the development focus will turn to the building of partnerships including with the private sector to encourage the designing in of fraud prevention into financial processes and technologies.</td>
<td>Commences 1 Apr 2015</td>
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THE FRAUD PREVENTION NETWORK

Local Force SP OCs
Local Authority
Local Partners

Cabinet Office
Home Office
BI S
CI FAS BBA BRC
Get Safe on Line

EC P C

Industry Sector Reps
Trading Stds
Policing Leads & SP OCs

Regional SP OCs

Fraud Prevention Group

ECC Threat Group

EC P

Advising
Reporting
THE FRAUD PREVENTION NETWORK - GOVERNANCE

ECC Threat Group
- Informs multi-agency prevention group

Economic and Cyber Enabled Crime Prevention Group
- Advises on Priorities, Messages and Messaging. Coordinates and reviews multi-agency activity

ECP
- Oversight

ECONOMIC CRIME PREVENTION CENTRE

Fraud Crime Prevention Network
- Delivery and coordination, with partners of national, regional and local prevention activity

10 x Regional Policing SPOCS

43 x Local Policing SPOCS

Prevention resources, safer community teams.