



Economic Crime Board of the Police Committee

Date: WEDNESDAY, 6 FEBRUARY 2013
Time: 1.45 pm
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL
Members: Simon Duckworth (Chairman)
Mark Boleat
Alderman Ian Luder
Helen Marshall
Alderman Neil Redcliffe
Deputy Richard Regan

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Lunch will be served for Members in the Guildhall Club at 1pm

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **DECLARATIONS BY MEMBERS OF PERSONAL OR PREJUDICIAL INTERESTS IN RESPECT OF ITEMS TO BE CONSIDERED AT THIS MEETING**
3. **MINUTES**
To agree the public minutes and summary of the meeting held on 14 September 2012 (copy attached).
For Decision
(Pages 1 - 4)
4. **NATIONAL LEAD FORCE: THIRD QUARTER PERFORMANCE REPORT**
Report of the Commissioner (copy attached).
For Information
(Pages 5 - 70)
5. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
7. **EXCLUSION OF THE PUBLIC**
MOTION – That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

Part 2 - Non-Public Agenda

8. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 14 September 2012 (copy attached).
For Decision
(Pages 71 - 72)
9. **ECONOMIC CRIME UPDATE - NATIONAL CAPABILITY PROGRAMME**
Report of the Commissioner (copy attached).
For Information
(Pages 73 - 80)
10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
11. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

ECONOMIC CRIME BOARD OF THE POLICE COMMITTEE

FRIDAY, 14 SEPTEMBER 2012

Minutes of the meeting of the ECONOMIC CRIME BOARD held at Guildhall, EC2, on FRIDAY 14 SEPTEMBER 2012, at 3.55pm.

Present

Members

Simon Duckworth (Chairman)
Mark Boleat
Alderman Ian Luder
Helen Marshall

Officers

Gregory Moore - Town Clerk's Department

City of London Police

Ian Dyson - Assistant Commissioner
Olly Shaw - T/Chief Supt, Economic Crime Directorate
Hayley Williams - Corporate Support, CoLP

1. APOLOGIES

Apologies for absence were received from Deputy Richard Regan.

2. DECLARATIONS BY MEMBERS OF ANY PERSONAL AND PREJUDICIAL INTERESTS IN RESPECT OF ITEMS ON THIS AGENDA

There were none.

3. MINUTES

The public minutes of the meeting held on 13 June 2012 were approved.

4. NATIONAL LEAD FORCE: FIRST QUARTER PERFORMANCE REPORT AGAINST KEY PERFORMANCE INDICATORS 2012/13

The Committee received a report of the Commissioner summarising the Force's performance against the National Lead Force Key Performance Area framework and supporting Key Performance Indicators (KPIs) for the first quarter of 2012-13.

The Assistant Commissioner prefaced the report by explaining that this sort of performance measuring system was historically uncommon in the particular field and so the Force were seeking to introduce and develop something that clearly explained how various figures were obtained. Accordingly, he sought Members views as to whether or not the KPIs presented in this document were both appropriate and effective, and where any improvements could be made.

A Member made reference to KPI 3.4, which he felt was of particular importance, observing that two key elements needed to be included. He

advised that it would be important for the measure to also include the opening and closing figures of those cases awaiting trial, as well as the figures for acquittals and discontinuances, in order to be able to gain a fuller picture of the whole pool of cases being dealt with. For instance, at present the KPI showed that last year 141 individuals were convicted and 49 had entered guilty pleas, but there was no indication as to how many were not convicted or were still awaiting trial, making a full and accurate assessment of the position difficult. The Chairman supported the Member's comments, adding that presenting the sentence lengths in a different way, rather than through an aggregate as at present, would be useful as currently it was impossible to distinguish what sort of cases were being dealt with and where the crimes were of a particularly significant scale.

Another Member agreed that the inclusion of baseline numbers was needed as many cases took years to conclude, so a running total would be invaluable. Further, listing the number of cases which were being submitted to the Crown Prosecution Service (CPS) and their outcomes would also be useful, so that where a significant proportion of cases being rejected by the CPS it would highlight that there was an issue that needed addressing. The Chief Superintendent of the ECD advised that a form had recently been introduced which provided the Force with a qualitative assessment showing whether or not the CPS' decision not to proceed with a case was based on a quality of evidence issue or due to the public interest test, so that this could indeed be tracked and evidenced as suggested.

It was also suggested that those cases where the investigation was taken over by Serious Fraud Office but where the City Police were still assisting should be listed in some way, with some sort of method or feedback system devised to enable the Force to demonstrate their participation in such joint investigations. The Chairman commented on the importance of demonstrating this, suggesting that it would be worth looking at introducing a KPI for joint investigation as part of the National Lead Force role, to better demonstrate the Force's national value.

With regard to the survey, a Member advised that it would be sensible to list sample sizes so that when results such as 25% or 50% were obtained it demonstrated that these were not merely due to a small sample size. He stressed that it was also important to use surveys to drive a culture, rather than just as a tool to show how well the Force were doing, and to be careful that the questions being asked in surveys were pertinent to the people they were being asked to so that responses obtained were of use.

RECEIVED.

5. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were no questions.

6. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There were no urgent items.

7. EXCLUSION OF THE PUBLIC

RESOLVED--That under Section 100A of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involved the disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

Item No.

8 - 9

Exempt Paragraphs

3

SUMMARY OF MATTERS CONSIDERED
WHILST THE PUBLIC WERE EXCLUDED

8. ECONOMIC CRIME UPDATE - NATIONAL OPERATIONAL DELIVERY

The Members received a report of the Commissioner providing an update on the current position of the Economic Crime national operational delivery project.

RECEIVED.

9. FRAUD TRAINING ACADEMY: PROGRESS REPORT

The Board received a report of the Commissioner updating Members on the current position in respect of the proposed Fraud Training Academy.

RECEIVED.

10. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were no questions.

11. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There were no urgent items.

The meeting closed at 16.45pm.

CHAIRMAN

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Committee(s): Police: Economic Crime Board		Date(s): 6 th February 2013																			
Subject: National Lead Force: Third Quarter Performance Report		Public																			
Report of: Commissioner of Police (POL 07/13)		For Information																			
<u>Summary</u> This second performance report to your Economic Crime Board summarises the achievements of National Lead Force (NLF) during the 3rd quarter of 2012/13 – set against its agreed Key Performance Areas (KPAs) and Key Performance Indicators (KPIs). The report also details action being undertaken to rectify areas of underperformance and provides a summary of future developments in performance management; these include: • Introduction of a revised performance framework for 2013/14 with fewer KPIs and the use of simplified language • Changes to stakeholder management, designed to obtain better quality and more timely performance information • Steps being taken to reduce the cost of monitoring NLF performance targets As a quick guide for board members, the table below highlights the main performance headlines for Q3 (October to December 2012): <table><tr><th>NLF objective</th><th>Comment on progress</th></tr><tr><td colspan="2">KPA 1 Preventing and reducing the harm caused by economic crime</td></tr><tr><td>KPI 1.1 To increase the value of future economic crime disrupted by intervening against enablers of fraud</td><td>Being met</td></tr><tr><td>KPI 1.2 To increase economic crime public awareness and stakeholder prevention</td><td>Being met</td></tr><tr><td>KPI 1.3 To increase victim self-protection and reduce repeat victimisation</td><td>Being met</td></tr><tr><td colspan="2">KPA 2 Enriching the national economic crime threat assessment and intelligence picture</td></tr><tr><td>KPI 2.1 To extend the impact and reach of strategic intelligence dissemination</td><td>Being met</td></tr><tr><td>KPI 2.2 To extend the impact and reach of operational intelligence dissemination</td><td>Being met</td></tr><tr><td>KPI 2.3 To extend the impact and reach of organised crime group intelligence dissemination</td><td>Being met</td></tr></table>				NLF objective	Comment on progress	KPA 1 Preventing and reducing the harm caused by economic crime		KPI 1.1 To increase the value of future economic crime disrupted by intervening against enablers of fraud	Being met	KPI 1.2 To increase economic crime public awareness and stakeholder prevention	Being met	KPI 1.3 To increase victim self-protection and reduce repeat victimisation	Being met	KPA 2 Enriching the national economic crime threat assessment and intelligence picture		KPI 2.1 To extend the impact and reach of strategic intelligence dissemination	Being met	KPI 2.2 To extend the impact and reach of operational intelligence dissemination	Being met	KPI 2.3 To extend the impact and reach of organised crime group intelligence dissemination	Being met
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KPA 3 Enforcing and disrupting economic crime at the local, regional and national levels	
KPI 3.1 To increase the value of criminal asset denial through to recovery (end to end process)	Being met
KPI 3.2 To increase the value of future fraud disrupted by NLF enforcement cases	Being met
KPI 3.3 To reduce the intent and capability of the most serious Organised Crime Groups perpetrating fraud	Not being met
KPI 3.4 To improve the quality of investigation and thereby enhance judicial outcomes	Being met
KPA 4 Raising the standard of economic crime prevention and investigation nationally by providing education and awareness to the counter fraud community	
KPI 4.1 To improve the impact and reach of training strategy and delivery	Being met
KPI 4.2 To enhance the impact and reach of standard setting and dissemination of best practice guidance	Being met
KPA 5 Delivering value and reassurance to our community and partners in industry	
KPI 5.1 To increase return on investment in NLF (£saved per £spent	Being met
KPI 5.2 To improve overall satisfaction of community (including victims) and partners in industry with NLF economic crime services	Being met
KPI 5.3 To increase the £value and % of leveraged partnership funding	Being met
Recommendation It is recommended that your board receives this report and notes its contents.	

Main Report

Background

1. At the September board meeting members received a report detailing National Lead Force (NLF) performance during the first quarter of the financial year (2012/13), set against an agreed performance framework.
2. This second performance report provides an update on achievements through to Quarter 3 (October to December 2012). The main successes and challenges of NLF performance are summarised in the forthcoming sections along with details of future developments in the collection, measurement and setting of targets.
3. As a reminder for board members, the current NLF performance framework, introduced in April 2012, was constructed under the

guidance of an external performance consultant and Bernard Herdan, the former head of the National Fraud Authority. The framework was designed to be deliberately stretching in its ambition; many of the mechanisms for collecting performance data being untested – nor had baselines been established in all cases. It was further intended to continually assess the framework during 2012/13 with a view to further refinement, preparing the way for routinely sharing NLF performance results with its many stakeholders.

4. Now that three quarters of the financial year have passed, work is underway to review existing KPIs and baselines. This has identified where the collection of data to support KPIs has been problematic, uneconomical or statistically weak (either due to the size of the survey group or the natural fluctuation in results). A revised framework is being constructed for introduction in April this year.
5. The revised framework for NLF will not only incorporate learning from the current review but will use simplified language to describe KPAs and KPIs (following feedback from stakeholders and staff). Similarly, the overall numbers of KPIs will be reduced to around ten (from the existing 15).
6. One of the specific findings to be identified during the review is a flaw in the mechanism for obtaining stakeholder feedback - the independent survey company engaged to conduct this work finding it difficult to identify one single person within a large organisation with the first hand experience necessary to comment on all areas of NLF activity. As such, whilst stakeholders will continue to be independently surveyed during 2013/14, the focus will move to victim management. The main reason for being able to move away from independent stakeholder surveys (and still obtain regular feedback) is the introduction of a new stakeholder management processes. In future, all stakeholders meetings and events will be subject to 'contact reports', incorporating questions from the existing survey; analysis of these reports will be conducted by the NLF Stakeholder Manager. In this way, it will be possible to gather timely feedback on NLF performance with the confidence that comments have been made by individuals who regularly interact with the Force.
7. Another benefit of reviewing the existing performance framework has been to identify opportunities to reduce the cost of collecting and analysing performance data. At present NFL contracts an independent research company to complete stakeholder and victim surveys, this work is separate to that undertaken by the Force under its obligation to conduct

Home Office victim surveys. It is intended these two streams of work will be merged from 1st April onwards to achieve costs savings.

Current Position

8. Members will find below a table summarising achievements against the 15 Lead Force KPIs - with a corresponding narrative. A full explanation of performance calculations is available at Appendix A (National Lead Force Performance Outcomes – Quarter 3 Report).

NLF objective	Comment on progress
KPA 1 Preventing and reducing the harm caused by economic crime	
KPI 1.1 To increase the value of future economic crime disrupted by intervening against enablers of fraud	The current target for Q3 is 655 disruption requests, NFIB are currently exceeding by 205 disruptions requested. Disruption requests are sent to external organisations to close telephone, website or bank accounts.
KPI 1.2 To increase economic crime public awareness and stakeholder prevention	Combined results from the two stakeholder surveys conducted in 2012 revealed that 84% of respondents state NLF has been successful in increasing awareness of fraud and helping stakeholders protect themselves. The stakeholder survey process has been reviewed; surveys in 2013 will provide a more accurate indication of progress.
KPI 1.3 To increase victim self-protection and reduce repeat victimisation	NFIB's survey process has revealed 83% of recipients found the content of the alert they received made a positive contribution to their business/operations.
KPA 2 Enriching the national economic crime threat assessment and intelligence picture	
KPI 2.1 To extend the impact and reach of strategic intelligence dissemination	The reach of NFIB strategic products has increased to 555 recipients, this includes both public and private stakeholders. Combined results from the two stakeholder surveys conducted in 2012 revealed that 69% found strategic intelligence disseminated by NLF was of high quality and relevance.
KPI 2.2 To extend the impact and reach of operational intelligence dissemination	Combined results from the two stakeholder surveys conducted in 2012 revealed the overall perception of these products is positive. The stakeholder survey

	process has been reviewed and more targeted surveys will be conducted in 2013; these will provide a more accurate indication of progress.
KPI 2.3 To extend the impact and reach of organised crime group intelligence dissemination	The increase of 43 OCG intelligence disseminations produced in Q3 by NFIB all related to National Crime Agency (NCA) operations. This has enriched the NCA's knowledge of crime groups and typologies.
KPA 3 Enforcing and disrupting economic crime at the local, regional and national levels	
KPI 3.1 To increase the value of criminal asset denial through to recovery (end to end process)	The Asset Recovery Team are currently performing very well in relation to the volume target for Confiscation Orders, as they are 12 orders over the cumulative target for the end of Q3, and have already exceeded the target milestone for the end of year. The figures suggest that the Asset Recovery Team (ART) will greatly exceed the overall target set for 2012/13. In relation to cash seizures, the ART, are above target at the end of Q3 having completed 40 seizures to date; the cumulative target for the end of Q3 was set at 38. The figures indicate that the ART will achieve the target of achieving 50 cash seizures by the end of Q4 2012/13.
KPI 3.2 To increase the value of future fraud disrupted by NLF enforcement cases	The value of future fraud disrupted is a complex calculation and is based on a number of contributory factors. Q3 has seen a significant rise in the value; this is representative of the types of cases investigated. This element of the calculation cannot be controlled; the value of future fraud disrupted for Q3 is £317,830,210.
KPI 3.3 To reduce the intent and capability of the most serious Organised Crime Groups perpetrating fraud	Since the start of 2012/13 - 20 OCG disruptions have been recorded. This is 2 disruptions above the target number for the end of Q3 (20). There will now be improved reporting in this area. The Force Intelligence Bureau (FIB), have been given the responsibility for managing all CoLP OCGs and have introduced an OCG panel to oversee the quality of work against organised crime. This

	includes oversight of the OCG mapping process. This process requires that officers submit a claim form which is then reviewed at a monthly OCG management meeting and ratified accordingly.
KPI 3.4 To improve the quality of investigation and thereby enhance judicial outcomes	The number of suspects charged in Q3 2013 is 56 in comparison with 23 charges achieved in Q3 2012. This shows a significant increase and is reflective of the quality of investigations conducted.
KPA 4 Raising the standard of economic crime prevention and investigation nationally by providing education and awareness to the counter fraud community	
KPI 4.1 To improve the impact and reach of training strategy and delivery	The cumulative figure of delegates that have found the CONTENT and QUALITY of the NLF courses to be either Excellent, Good or Very Good and who are overall satisfied is 95%, which exceeds the target of 85% or above.
KPI 4.2 To enhance the impact and reach of standard setting and dissemination of best practice guidance	A significant number of key stakeholders have a good perception of the best practice disseminations they have received; half of stakeholders feeling that the guidance has improved their ability to investigate fraud. This suggests that NLF has made significant progress in taking a lead force stance in guiding other forces and key industry partners in the most effective fraud prevention and investigations methods.
KPA 5 Delivering value and reassurance to our community and partners in industry	
KPI 5.1 To increase return on investment in NLF (£saved per £spent	The year to date, return on investment figure of £56 shows a significant increase on the cumulative figure in value since Q1, which would indicate that the three capability areas within NLF are performing more effectively, within greater budgetary constraints than in quarter 1.
KPI 5.2 To improve overall satisfaction of community (including victims) and partners in industry with NLF economic crime services	Combined results from the two stakeholder surveys conducted in 2012 revealed that 95% of respondents are satisfied with the overall performance of NLF.
KPI 5.3 To increase the £value and % of leveraged partnership funding	In comparison with 2011/12 the % of leveraged funding has increased from 66% to 71%, and

	the £ value has increased from £9,605,000 to £11,898,041 respectively.
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Performance Successes

9. The NFIB has made considerable progress, significantly increasing the range of stakeholders receiving strategic intelligence products to 555 this quarter; intelligence is being disseminated more frequently and to a wider audience. Survey results indicate that the quality and relevance of NFIB alerts remain high with 83% of recipients finding the content of the alert contributed to their business/operations¹.
10. The disruption of fraud enablers is a significant aspect of fraud prevention and the NFIB continue to exceed the quarterly target. At the end of quarter three, the unit are just sixteen disruptions short of the 2012/2013 target (874 disruptions).
11. The performance of the Asset Recovery Team is exceptional; both the volume of confiscation orders and cash seizures exceeds the cumulative target for quarter three. The confiscation orders have already achieved the target milestone for the reporting period 2012/2013.
12. The Fraud Academy has exceeded the quarter three target in relation to the quality of the courses delivered; 95% of delegates have found the content and quality to be of good quality compared to a target of 85%.
13. Return on investment has increased to £56 per £1 spent; this is indicative of better performance in the areas of investigation, disruption, asset recovery and the judicial process. However, the figure should be approached with a degree of caution as a number of the component parts of the calculation are subjective (no national guidance available). The 2013/2014 reporting year will provide opportunities to consult with our stakeholders to seek expert opinion on ROI methodology using the 2012/2013 baseline as a foundation for further exploration and validation.

Performance Challenges

14. Disrupting Organised Crime Groups (OCG) has proved challenging. The Lead Force target (KPI 3.3) equates to disrupting 24 OCGs during 2012/13, achievement being scored when a group has been moved to a lower threat tier. The calculation for the 3rd quarter was made in

¹ NFIB Survey monkey results

November 2012 when fifteen OCGs had been disrupted, three below target. However, management action has now brought performance back on target, the December recalculation saw 20 groups disrupted two above target.

15. KPI 3.4: Measuring the quality of fraud investigations and judicial outcomes remains a difficult process. Whilst productivity has increased in comparison to quarter three 2011/2012 (the number of charged suspects rising from 23 to 56), ongoing engagement with the CPS Central Fraud Group has yet to achieve agreement on a mechanism for checking the quality of police files. With the CFG developing an integrated IT solution for data capture, it is anticipated that a mechanism for file quality will be finalised in advance of the new reporting year.
16. As referenced, ROI calculations are to an extent subjective and require further refinement and validation. Work with the National Fraud Authority has not been successful in agreeing a national framework although the establishment of the new National Crime Agency may provide further impetus. In advance of the agreement of values that can be used across law enforcement, The Economic Crime Directorate has started to break the calculations down across each department, providing an ability to identify where the greatest value is achieved.

Conclusion

17. Challenging targets for NLF are currently in place and the City of London Police, through its Economic Crime Directorate, is achieving its ambitions in the vast majority of cases. Where performance expectations have not been met, corrective activities, such as that around organised crime group disruption, have succeeded in bringing performance back on track. This is a firm indicator that a culture of performance achievement within the Directorate is now starting to become embedded.
18. The current review of the 2012/13 performance framework will seek to further refine KPAs and KPIs in order that underlying objectives are more readily understood by staff and stakeholders, data collection is more accurate and is achieved at least cost.

Background Papers:

- National Lead Force Performance Outcomes – Quarter 3 Report

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National Lead Force Performance Outcomes

Quarter 3 (October – December 2012)

Measuring our performance against the key performance indicators

January 2013

Purpose

This report is designed to provide an indication of how National Lead Force performed during quarter 3 of 2012/13, by measuring and analysing the performance of each NLF capability area against both the performance indicators and the targets set under the NLF Performance Framework, (launched at the start of 2012/13).

National Lead Force (NLF) has the following three capability areas:

- **Operational Delivery**, including: Fraud Teams, Money Laundering Investigation Unit, Asset Recovery Team, Dedicated Cheque & Plastic Card Unit, Overseas Anti Corruption Unit, Insurance Fraud Enforcement Department
- **National Fraud Intelligence Bureau**
- **Fraud and Economic Crime Training Academy**

Each of the performance indicators are designed to reflect how each of the NLF capability areas are contributing towards strengthening our overall ability to deliver in the key performance areas.

Interpretation

1. To provide focus for the reader, the relevant NLF capability area, to which each of the performance indicators relate, is marked in the top right hand corner of each page.
2. For each of the performance indicators, a number of measures are used to represent NLFs performance in that particular area; these measures are also set out at the top of each page.
3. During Quarter 2, a further set of independent stakeholder and victim surveys (Wave 2) were carried out to complement the results from the Wave 1 set of surveys (April 2012) - the key results from both of the surveys are discussed within this report.
4. The 7 quarterly performance targets are aligned in the report, with the relevant performance indicator. For ease of reference, a summary of the position in relation to all of the performance targets, is also provided at the end of the report.

Contents & glossary

National Lead Force (NLF)	National Fraud Intelligence Bureau (NFIB)
Operational Delivery Teams ('Ops Delivery')	Fraud and Economic Crime Training Academy ('Academy')
Business Performance Team (BPT)	Insurance Fraud Enforcement Department (IFED)
Overseas Anti Corruption Unit (OACU)	Money Laundering Investigation Unit (MLIU)
Dedicated Cheque and Plastic Card Unit (DCPCU)	Asset Recovery Team (ART)
Organised Crime Group (OCG)	Law Enforcement Agency (LEA)
NFIB feedback process ('Survey Monkey')	<i>SPA Future Thinking</i> independent survey company ('SPA')
Key performance area (KPA)	Key performance indicator (KPI)

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Quarter 3 performance highlights

Prevention and harm reduction outcomes

- NFIB have exceeded their target for Q3 in increasing the volume of disruptions of fraud enablers , achieving over 100 extra disruptions. The disruption of fraud enablers is a significant aspect of fraud prevention, and at the end of Q3, NFIB are only sixteen disruptions short of the 2012/2013 target of 874 disruptions.
- 58% of respondents to the NFIB Survey Monkey feedback, were able to use an NFIB fraud alert to take direct action within their organisation to reduce the threat of fraud, and by implication, the quality of that alert is deemed to have been good.

Intelligence dissemination outcomes

- The number of recipients of NFIB strategic products has increased significantly in Q3, indicating that intelligence is being disseminated more frequently and to a wider audience increasing impact of disseminations.
- Survey results indicate that the quality and relevance of NFIB alerts remain high.

Enforcement outcomes

- The Asset Recovery Team are performing very well at the end of Q3; both the volume of confiscation orders and cash seizures exceeds the cumulative target for quarter three. The confiscation orders have already achieved the target milestone for the reporting period 2012/2013.
- Since the start of 2012/13 - 20 OCG disruptions have been recorded. This is 2 disruptions above the target number for the end of Q3 (20).

Training and guidance outcomes

- The cumulative figure of delegates at the end of Q3, that have found the CONTENT and QUALITY of the NLF courses to be either Excellent, Good or Very Good and who are overall satisfied is 95%, which exceeds the target of 85% or above.

Delivering value outcomes

- Return on investment has increased , which illustrates collectively excellent performance in the areas of investigation, disruption, asset recovery and the judicial process.
- Overall, stakeholder satisfaction in NLF remains consistent at 95% and victim satisfaction in NLF remains at 89%.



Key Performance Area 1

Preventing and reducing the harm caused by economic crime

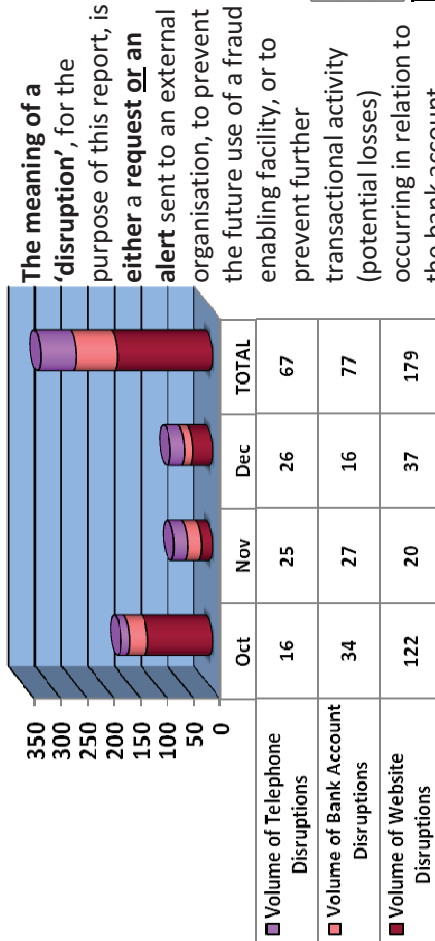
KPI 1.1 £ value of future economic crime disrupted by intervening against enablers of fraud

NFIB

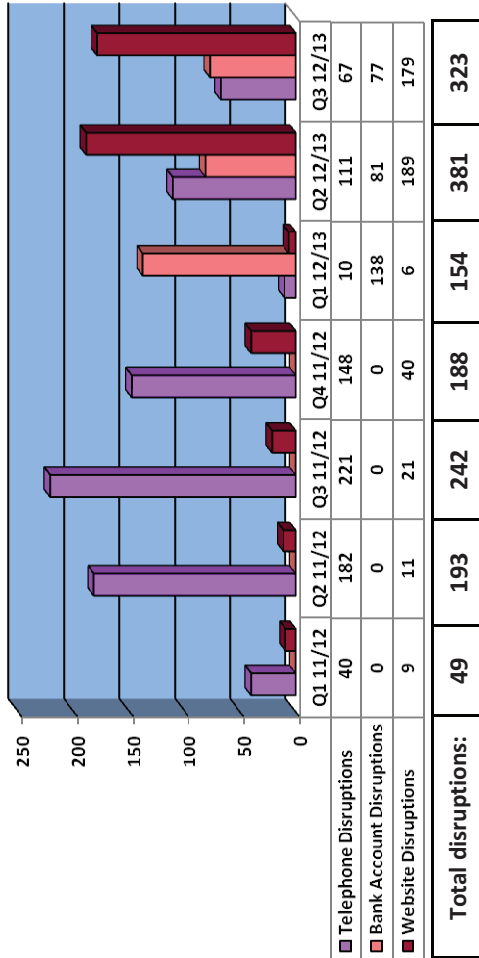
Measure: 1) Website, telephone and bank account disruptions achieved by NFIB each quarter

Source: NFIB

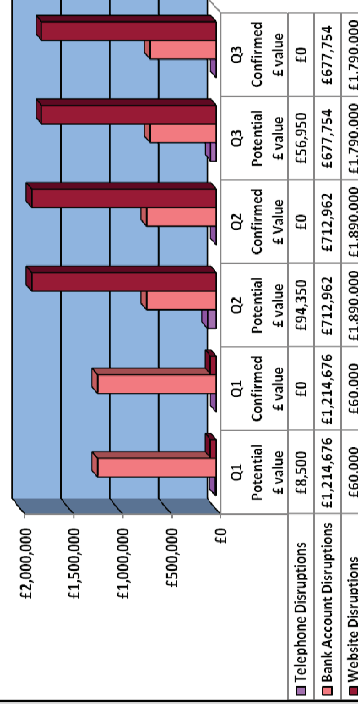
Volume of disruptions month by month 3rd Quarter 2012/13



Volume of disruptions, compared with previous quarters



£ value of NFIB disruption activity (potential & confirmed)



Total £ value 'Potential' quarterly disruptions	Q1	Q2	Q3
	£1,283,176	£2,697,312	£2,524,704
Total £ value 'Confirmed' quarterly disruptions	Q1	Q2	Q3
	£1,274,676	£2,602,962	£2,467,754
			3

£2,467,754 represents the **CONFIRMED (estimated) £ value of future fraud prevented**, as a result of the NFIBs disruption activity, achieved within Q3.

Any subsequent preventative action taken by the external organisation(s) who receive(s) the request / alert, is currently followed up by NFIB for **Website disruptions only**, thus all website disruption activity (**Q3 = £1,790,000**) is reflected in the '**Confirmed**' figure for Q3.

NFIB are currently addressing how the significant monetary value of bank account disruption work can be most effectively measured. Until such refinement work is complete, the £ figure attributable to bank account disruption activity (**Q3 = £677,754** based on below assumptions) will also contribute towards the **Q3 'Confirmed' total**. Anecdotal & NFIB survey feedback from the banks in quarter2, shows **£71,700** was prevented as a result of bank disruption activity in **just 2 cases**, which shows the huge value of this type of disruption activity.

£2,524,704 represents the **POTENTIAL (estimated) £ value of future fraud prevented** in Q3.

The £ value calculations are based on the following assumptions:

Estimated average £ value of a bank account disruption: **£8,802***

Estimated average £ value of a telephone disruption: **£850**

Estimated average £ value of a website disruption: **£10,000****

*Source: NFIB

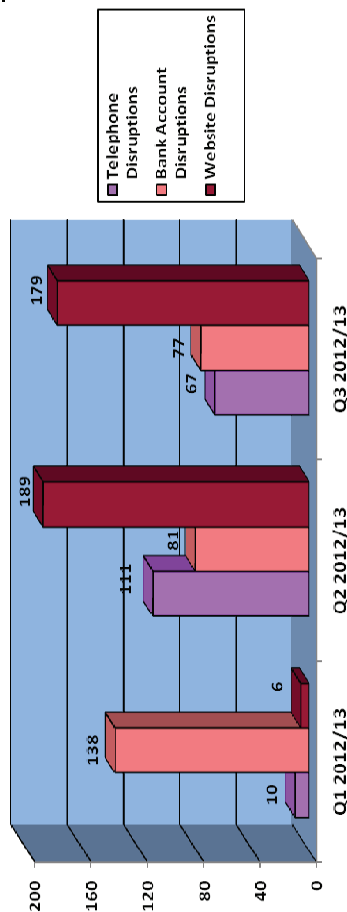
**Source – Research on Impact of Mass Marketing Frauds, OFT Report Dec 2006 & used in NFA Annual Fraud Indicator - Nov 2011 - Assumes that 12 People saved from victimisation per Website Disruptions)

KPI 1.1 £ value of future economic crime disrupted by intervening against enablers of fraud

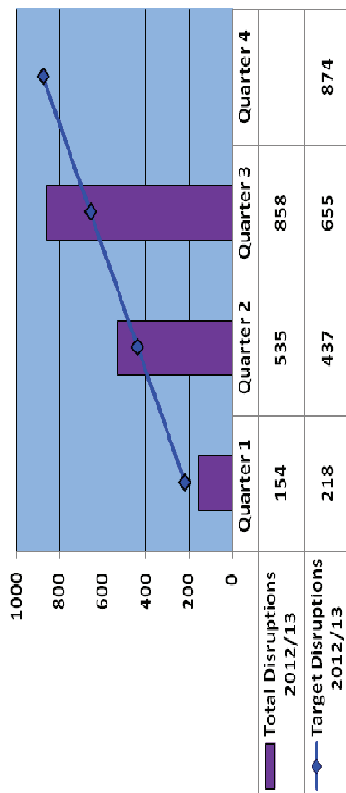
NFIB Target: To increase the volume of suspensions (disruptions) of technological enablers via the NFIB by 30%

Source: NFIB

Volume of NFIB disruptions, Q1, Q2 & Q3 comparison



Total volume of NFIB disruptions – 2012/13 (against cumulative target)



Analysis

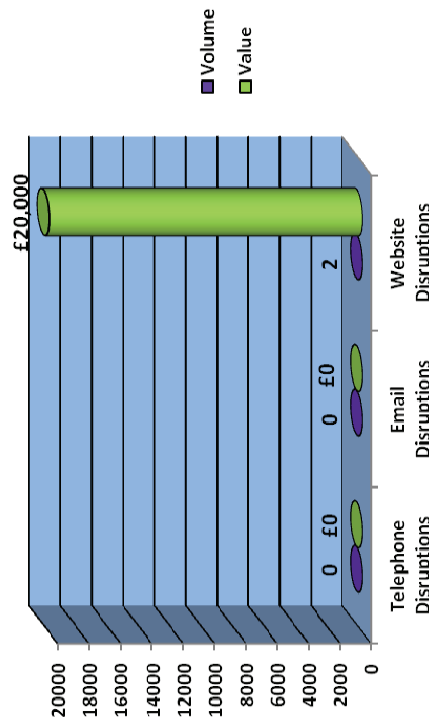
- The **confirmed £ value of future fraud prevented**, attributable to NFIB disruptions for quarter 3 is **£2,467,754**. This is a **decrease of £135,208** from Q2. The **potential £ value** attributable to disruption activity, has also **decreased from Q2 by £172,608**, which highlights the need to consider improved ways of measuring the *actual* value of the disruption activity. By liaising with the banking industry the NFIB are trying to establish a more effective way of measuring the £ value of NFIB bank account disruption activity, which will assist in future, in attributing a **greater £ value** to the **confirmed £ value of future fraud prevented**.
 - Notably, the extent of telephone account disruption activity within Q3 has **decreased by 44**. The £ value decrease could potentially be as a result of the slightly lower number of websites that were disrupted in Q3. NFIB are currently focussing more on the disruption of websites as this has a greater effect in the prevention of fraud.
 - To ensure that every opportunity to undertake disruption activity is taken by the NFIB, in particular relation to bank accounts, direction has been given to operational delivery investigators to feed in to NFIB details of any bank accounts under investigation. A further work plan is currently being put together by NFIB to explore opportunities to report on the NFIB disruption of professional and financial enablers.
 - **TARGET – NFIB has again exceeded their target for Q3** (achieving over 100 extra disruptions). Even though the volume of disruptions has slightly decreased in Q3 compared to Q2, NFIB are still clearly on target to meet the 874 disruptions for 2012/13, in fact only a further 16 disruptions are required to meet the yearly target, which positively suggests that the target will be achieved by the end of the financial year.
 - The volume of disruptions achieved during Q3 overall is high. The **confirmed estimated £ value figure for fraud prevented** as a result of the disruption activity, shows the significant value of this work, in preventing & reducing the overall harm caused by technologically-enabled fraud.
- Recommended Action:**
- **All operational teams** to continue to pass details of any bank accounts under investigation to the NFIB to reduce fraudulent activities. Operational delivery DCI's are to provide a dip sample to ensure that every opportunity is being utilised, on a quarterly basis to indicate performance.
 - **NFIB to investigate** the decrease in volume of all disruptions in Q3 and to ensure that there is an increase by the end of Q4.
 - **NFIB requires a process** to differentiate between the disruptions originating from NFIB and other operational units.
 - **NFIB are to provide** an update on the objectives of the work plan currently being put together, and a time frame for delivery.
 - NFIB to review disruption calculation for bank accounts to ensure the value is reflective of prevention activity.

KPI 1.1 £ value of future economic crime disrupted by intervening against enablers of fraud Ops Delivery / IFED / DCPCU

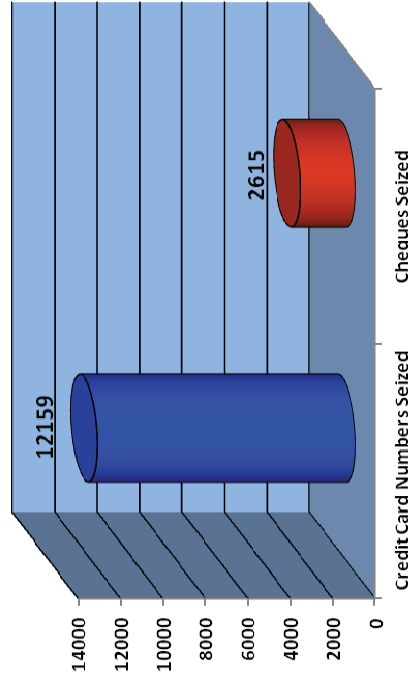
Measure: 1) Disruptions achieved by IFED & DCPCU each quarter

Source: IFED & DCPCU

Volume & Value of CONFIRMED IFED disruptions – Q3 2012/13



Volume of CONFIRMED DCPCU disruptions – Q3 2012/13



£ Value of CONFIRMED DCPCU disruptions – Q3 2012/13

Disruption Type	Total £ Value of Disruption	CoLP proportion
Credit card numbers seized	£20,890,375	£10,445,187
Cheques Seized	£5,962,200	£2,981,100
TOTAL:	£26,852,575	£13,426,287

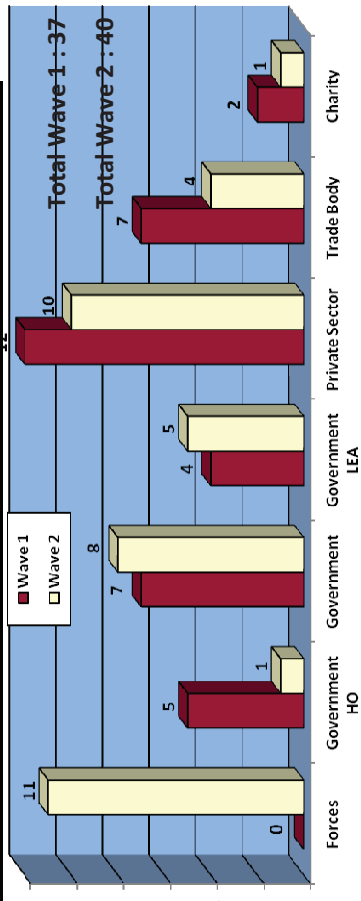
Comment:

- **This report now includes** disruption interventions undertaken by IFED and DCPCU against enablers of fraud in order to demonstrate those departments activities in this area and provide a £ value of future fraud disrupted by intervening against fraud enablers for the Return on Investment.
- **IFED activity** in this area concerns the suspension of 2 web sites in the period. IFED confirm they do undertake email and telephone suspensions but none were undertaken in the period. The same multiplier values applied to NFIB disruption's are applicable in this instance.
- **DCPCU activity in this area** is derived from the seizure of Credit cards, credit numbers and cheques. The relevant account details are passed to the banking industry leading to the closure of accounts thus disrupting future fraud. A multiplier value is attached to each card or bank number disrupted and DCPCU, with the agreement of their industry funders are allowed to claim a £ value for savings made to the banking industry. Using the same logic as applied to NFIB disruptions of bank accounts used by fraudsters it is reasonable for DCPCU to claim these seizures as this activity does disrupt an enabler of fraud. The rationale applied by the banking industry to calculate the savings is complex with values being dependant on a number of factors. As the values attributed are agreed by the banking industry it is not necessary to re-produce the rationale and calculation in this report. These seizures of credit cards and cheques are generally made during and investigation that results in defendants being charged. It is agreed with DCPCU management that where seizures of credit cards or cheques are claimed as savings to the industry and appear in this section of the performance report they will not be claimed again in KPI 3.2 "£ value of future fraud disrupted by enforcement cases when the defendant is charged."

KPI 1.2 Increasing economic crime awareness and stakeholder prevention

Measure: 1) Responses from independent 6 monthly survey of key stakeholders, regarding NLF awareness & prevention

Breakdown by sector - Wave 1 & 2 Stakeholder Survey respondents



77 respondents were asked through the Stakeholder Surveys:
Wave 1 & 2 combined response % **(No. of respondents)**

'NLF has been successful in increasing awareness of fraud and helping stakeholders better protect themselves, in last 12 months'

- **Total agreeing: 84% (65)**
- **Total disagreeing: 4% (3)**
- **Neither agree nor disagree: 12% (9)**

Comment: 84% agree that NLF increase awareness, however a quarter of Trade Body stakeholders disagree with this. Trade Body dissatisfaction comments indicate that they do not agree we have been successful in increasing the awareness of fraud because we do not drive NLF's profile enough and appear to be absent at many conferences where we have the potential to do so. One Charity group stated that in their opinion the National Fraud Authority has had more of an impact than the National Lead Force itself.

'NLF has demonstrated **highly effective communication** activities targeting your sector to **inform and provide support** for preventing and reducing harm caused by fraud'

- **Total agreeing: 69% (53)**
- **Total disagreeing: 21% (16)**
- **Neither agree nor disagree: 10% (8)**

Comment: Those in strongest disagreement are from Government LEA, they feel they have dialogue at a senior level however, such a 'glossy sales pitch' at a high level does not translate into Operational Delivery. The information and communication looks good but the content does not match. Government consensus is that there is dialogue that takes place between them and the communications team, but that even though some communication activities may be of high quality it is not always focussed upon what they do. The Private Sector does not come to the City of London Police seeking knowledge but they hold us as a key valuable close partner.

Analysis and recommended action for NFIB and Corporate Comms

Increasing awareness: The majority of stakeholders agree that NLF is successful in the way it currently alerts its stakeholders to key fraud threats and as a result, recipients can: raise awareness, translate the risks highlighted and implement measures to self-protect within their own organisation. However, comments from Trade Body stakeholders suggest that we need to increase our visibility within the counter-fraud community.

Recommended action: 1) To continue to improve the reach of all of the NFIB 'fraud awareness' products disseminated. This will ensure prevention advice is **practical & timely** and is received by an increased number of key stakeholders. Emphasis to be placed on sectors and identifying what products are required by what sector and when.

Effective communication: A fifth of the stakeholders surveyed felt NLFs communication activities were ineffective at informing & supporting the counter-fraud community. Improvements could be made in the way NLF communicates with each of the sectors within that community, to establish stronger ties & keep stakeholders apprised of harm reduction strategies.

Recommended action: 1) A **clear communication strategy** needs to be devised to clarify the difference between NLF/SELF and CoLP, as the terms seem to be used interchangeably by internal NLF staff, which could be negatively impacting upon the message provided to NLF stakeholders. The Comms strategy should be clear in the messages NLF wishes to portray to its stakeholders. All departments should contribute in order to reflect all business areas.

KPI 1.2 Increasing economic crime awareness and stakeholder prevention

Measures: 1) NFIB 'Survey Monkey' feedback responses in relation to the quality of fraud alerts

2) Responses from independent 6 monthly survey of key stakeholders, regarding the quality of fraud alerts (Wave 2)

NFIB Target: To improve the quality of fraud alerts shared with businesses and public sector organisations by 10%

Volume of IFED Industry Alerts disseminated

1) NFIB 'Survey Monkey' feedback regarding the quality of fraud alerts during Q3 (includes law enforcement, government LEA's, trade body and private sector stakeholders)

12 responses overall

% (number of respondents)

58% (7) - Overall positive response - public and private sector respondents were able to use the alert to take a direct operational or policy decision, which helped to reduce the threat of fraud within their organisation.

25% (3) - Moderate satisfaction - respondents felt that the alert provided at the very least, useful background information / corroboration.

17% (2) - No value – respondents confirmed no value in the fraud alert

2) Stakeholder Survey - Wave 2 (regarding alerts)

40 responses overall

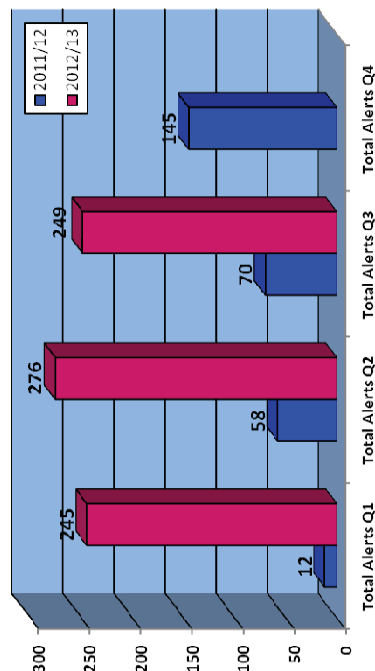
% (number of respondents)

- 61% 24 agreed fraud alerts were of high quality

- 39% 16 were unable to comment

TARGET: Fraud Alert quality was **only** measured in **Wave 2 Stakeholder Survey** – Therefore the baseline of **61% for Q2** has now been set for future quarters.

Volume of Fraud Alerts disseminated by NFIB



Volume of IFED Industry Fraud Alerts disseminated

Alert Type:	Disseminated via:	Recipient:
Organised	Via IFIG	Industry
Organised	Via IFIG	Industry
Opportunistic	Via SPOC List (Direct)	Industry via SPOC list
Opportunistic	Via SPOC List (Direct)	Industry via SPOC list
Opportunistic	Via NFIB	Industry via SPOC list
Opportunistic	Via NFIB	Industry via SPOC list
Opportunistic	Via NFIB	Industry via SPOC list
Opportunistic	Via NFIB	Industry via SPOC list
Organised	Via NFIB	Industry via SPOC list
Organised/Opportunistic	Via NFIB	Industry SPOC's
Organised	Via NFIB	To Mobile Phone Industry
Organised/Opportunistic	Via NFIB	Industry SPOC's
Organised/Opportunistic	Via NFIB	Industry SPOC's
Opportunistic	Via NFIB	Industry SPOC's

KPI 1.2 Increasing economic crime awareness and stakeholder prevention

Measures: 1) NFIB 'Survey Monkey' feedback responses in relation to the quality of fraud alerts

2) Responses from independent 6 monthly survey of key stakeholders, regarding the quality of fraud alerts (Wave 2)

NFIB Target: To improve the quality of fraud alerts shared with businesses and public sector organisations by 10%

Analysis

- **Volume of fraud alerts** disseminated has slightly **decreased since Q2** by 27, however Q3 is only the first quarter that has not seen an increase since Q2 2011.

The **reach of Q3 fraud alerts** (by sector): Police Forces (**104 alerts**), RIU Forces (**114**), Private Sector (**132**), Government & Government LEA (**84**), Internal ECD (3), Action Fraud Public alert (0).

- **Survey Monkey** – During Q3, 58% of respondents were able to use an NFIB fraud alert to take direct action within their organisation to reduce the threat of fraud, and by implication, the quality of that alert is deemed to have been good.

- **TARGET: Stakeholder Survey – 61% agreement that fraud alerts are of high quality** is positive, given that there was **no reported dissatisfaction**. The remaining 39% had not received a fraud alert, meaning satisfaction levels, for those who received a fraud alert were effectively 100%.

- On a monthly basis, BPT is analysing the results from Survey Monkey regarding fraud alerts and reporting to NFIB on how the quality of fraud alerts can be improved. NFIB is also considering ways in which it can **improve the Survey Monkey Feedback response rate** in relation to a number of its intelligence products.

Recommended Actions for Improving Quality:

- **Review and assess** the range of stakeholders that the Fraud Alert documents are sent to and ensure that there is continuity of who is receiving them.

- **Additional and more accurate proof reading** of documents to be completed before an alert is disseminated to avoid minor spelling and grammatical errors. This could potentially detract from a very useful and positive alert (Source – Survey Monkey analysis).

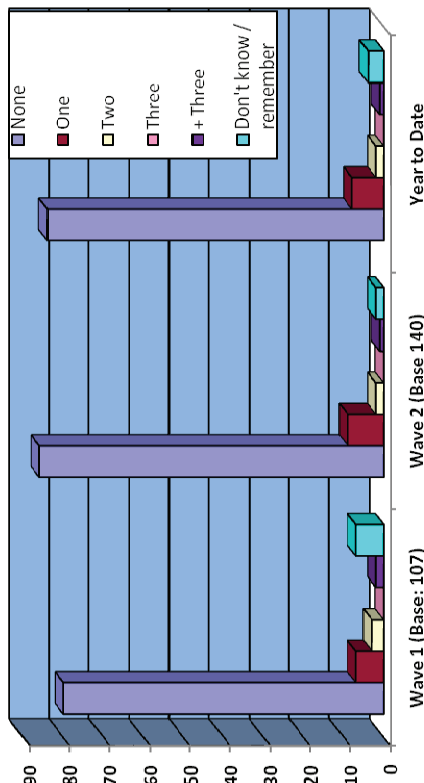
- **Ensure the relevance of the information** to the recipient organisations and also to ensure that the information/intelligence provided in the Alert is focussed with evidence of emerging threats.

- **A significant proportion of recipients were omitted**, by not undertaking any action to disseminate alerts to the public. It is acknowledged that some stakeholders may do this on the behalf of the NFIB. Consideration should be given to increasing public alerts, websites or with other organisations such as Action Fraud.

KPI 1.3 Increasing victim self-protection and reducing repeat victimisation

- Measures:** 1) Responses from Wave 1 & 2 independent 6 monthly victim survey, regarding crime prevention & repeat victimisation
2) Responses from Wave 1 & 2 independent 6 monthly survey of key stakeholders, regarding perception of NLF victim support

- Number of times victims (from Wave 1 & 2 Victim Surveys) have become a victim of fraud in last 12 months



Comment: Only a sixth of victims surveyed in Wave 2 had become a victim of fraud more than once in the last 12 months, and of these 20 victims, over half had only become a victim once more in the past 12 months. One victim stated that they had become a victim of fraud 4 times, including the one investigated by CoLP, which suggests a particular vulnerability, and something which NLF officers should be identifying at an early stage in their investigation.

Stakeholder Survey Wave 1 & 2 (77 Key stakeholders, including corporate victims of crime)

‘NLFs approach has been effective in supporting victims of fraud?’

Combined response breakdown by %:

- Total Agreeing (47%) **36 stakeholders**
- Total Disagreeing (6%) **5 stakeholders**
- Neither Agree or Disagree (47%) **36 Stakeholders**

- Overview of Wave 1 & 2 Victim Surveys regarding Crime prevention advice given by NLF (number of victims)

Wave 1 Survey (Total number of victims: 107)

- 36% (39 victims) - confirmed prevention advice was given
- 8% (9) did not receive advice, but felt they should have
- 48% (51) - did not feel they needed advice

Wave 2 Survey (Total number of victims: 140)

- 47% (66 victims) - confirmed prevention advice was given
- 6% (8) did not receive advice but felt they should have.
- 36% (50) - did not feel they needed advice

‘Do you think the crime prevention advice given has helped you better protect yourself against future fraud?’

Wave 1 Survey: (Total: 97) Wave 2 Survey: (Total: 126)

- 46% (45 victims) - Yes 50% (63 victims) - Yes
- 54% (52) - No 50% (63) - No

Comment:

Whilst a number of victims felt that crime prevention advice was not required, a significant number stated that they had actually received any fraud prevention advice, and some felt that the advice added no value. Many reported that the advice given had helped them to better understand how certain frauds are operated, therefore allowing them to see how they could be vulnerable to such types of fraud.

Comments:

Private sector stakeholders (corporate victims) agreed the most. A very small percentage of disagreement from the Private sector indicates that they believe NLF’s Victim support is the weak spot. This is due to the fact that they feel that they have never seen NLF proactively helping victims, and have been more focussed on collating information surrounding them rather than providing feedback and advice on threats. They would like a more effective, pragmatic and open dialogue around what NLF can and cannot do.

Even though a small percentage of Forces disagreed, comments indicate that this is because they think that there are far more victims out there than NLF are capable of servicing, therefore the entire fault does not lie with NLF.

Measure: 3) Volume of Corporate Communications activities during Q2**Volume of Corporate Communications – Q1 / Q2 / Q3 2012/13**

Communication Type	Press Releases/ pro-active media engagement	NFIB newsletter	NFIB Unique Website Hits	Twitter followers for CoLP IFED
Volume:	Q1 - 9 Q2 - 15 Q3 - 13	Q1 - 1 Q2 - 2 Q3 - 1 NFIB Christmas campaign	Q1 - 7305 Q2 - 11048 Q3 - 11562	Q1 end - 78 Q2 end - 178 Q3 end - 382

TV / Documentary: (Q1) 6 (Q2) 9 (Q3) 10

- IFED featured in a 10 part BBC series on Insurance Fraud. It received excellent reviews and may be repeated at prime time early next year. (Average Audience figures over 10 episodes – 1,219,100. This figure was higher than the normal average viewing figures at this time slot on BBC1, which are 862,900.)
- Supt Clark was interviewed on BBC Inside Out regarding scam mail.
- DCI Wood was interviewed on '5 Live'. DI Fyfe did a film feature on 'Uks biggest female fraudster' with Fake Britain.
- Adoboli conviction - Statement read by Commander Steve Head featured on BBC News, Channel 4, ITV, Sky and Radio 4 and 5.

Analysis & recommended action for Operational Delivery

- **The sample** of victims surveyed (Wave 1 & 2 victim surveys), was taken from a number of NLF frauds investigated by NLF Operational Delivery (Fraud Teams & MLIU). A significant number were victims of the mass-marketing frauds investigated by the above teams, as this is where a large proportion of NLFs individual victims originate from. IFED, OACU and DCPCU victims were not surveyed.
 - **Of the pool** of 247 individual victims surveyed, approximately **10% confirmed they had become a further victim of fraud** during the past 12 months (12 months prior to March / Sept 2012, depending on the wave surveyed) with **17 of those victims also confirming that they did not receive any fraud prevention advice from NLF, but felt that they should have**. Many of the victims took steps to protect themselves as a direct result of the advice given by NLF, but a **significant number of victims (115) did not feel the crime prevention advice given to them was effective or useful at protecting them against fraud**. A number of victims were not asked by the OIC, whether they had been a victim of crime previously (to establish possible vulnerability).
 - **The stakeholder surveys (Wave 1 & 2)** included respondents who may have been NLF corporate victims of crime, and therefore their comments in relation to NLFs approach to supporting corporate victims, are also very valuable.
 - **Overall 47% of stakeholders agree** that NLF's approach is of use to fraud victims. **One stakeholder from the Private Sector** banking industry states that they are a regular victim of fraud and do not receive a good response from NLF. They do not expect NLF to be able to do everything, however they are given the 'glossy advertising pitch' and they do not feel that this then matches the Operational delivery.
 - **IFED are still currently achieving the greatest impact through external communications activities in Q3**, whilst Operational Delivery & NFIB could take further opportunities to promote fraud awareness through these channels. The volume of visitors to the NFIB website has increased again during Q3 and is still an increasingly powerful medium for raising fraud awareness.
- Recommended action:**
- 1) Develop and increase the amount of fraud prevention advice provided to victims during the early stages of investigation.
 - 2) Ensure as part of the victim service we provide, that we identify any NLF victims who have been previous victims of fraud, and if appropriate, coordinate extra support if required (such as referrals to victim support).
 - 3) The Business Performance Team are to ensure a more reflective sample of victims is gathered to provide an accurate representation of performance in the area of victim service and satisfaction.



Key Performance Area 2

Enriching the national economic crime threat assessment and intelligence picture

KPI 2.1 Impact and reach of strategic intelligence dissemination

NFIB

Measures: 1) Responses from Wave 1 & 2 independent 6 monthly survey of key stakeholders, regarding **strategic intelligence**
2) Breakdown by sector of strategic intelligence reach

Strategic Intelligence Disseminations include: The NFIB Strategic Assessment 2012, the Monthly NFIB (Industry & Law Enforcement) Threat Updates, Technological-Enablers, Professional-Enablers and Money Laundering Problem Profiles

Impact of the intelligence products

Wave 1 & 2 Stakeholder Survey (41 respondents asked)

Wave 1 of the Stakeholder survey, was not representative of all NLF key stakeholders, therefore the results of Wave 1 & 2 Surveys have been combined to provide a year to date figure for all survey results.

‘The strategic intelligence NLF disseminates is of a high quality and is relevant’

- **Total agreeing:** 69% (28 respondents)
- **Total disagreeing:** 2% (1)
- **Neither agree nor disagree:** 29% (12)

Comment: Dissemination of strategic intelligence is seen as high quality; although less agrees that this intelligence has increased their ability to determine key threats. Some Police Forces felt that some of the intelligence was irrelevant to them and did not do anything with it.

‘This strategic intelligence has increased your ability to determine key threats and the strategy to counter them’

- **Total agreeing:** 49% (20 respondents)
- **Total disagreeing:** 14% (6)
- **Neither agree nor disagree:** 37% (15)

Comment: Nearly half of all stakeholders asked the above question believe that the Strategic Intelligence increases their ability to determine key threats. Other Government disagree with the above statement because they believe that they do not get anything back I return for the data that they supply. However, they do acknowledge that this may be due to data protection laws and dissemination rules.

Reach of the intelligence products Source: NFIB

Monthly Industry Threat Update – Q3 = 555 recipients of the monthly updates.

Industry sectors receiving the Threat Update include:

- Retail
- Insurance
- Medical
- Payment Card
- Legal
- Transport
- Banking
- Travel
- Telecommunications
- Financial Regulator
- Local Government

Monthly Law Enforcement Threat Update –Q3 = 203 recipients (including 54, police force FIBs) of each of the monthly updates. The number of recipients of the **Monthly threat update** (as above) will demonstrate the approximate range of the **NFIB Strategic assessment** and three types of **NFIB Problem Profiles**.

Comment: The reach of **NFIB products** disseminated to industry stakeholders and partners has increased to 555 recipients (from 349 in quarter 2). This increase is attributed to a large number of insurance industry stakeholders recently added to the circulation lists. It is also important to note that in addition to the monthly threat updates the same recipients have also started to receive a new NFIB Intelligence Debrief Report which is disseminated on a quarterly basis. The new product which contains more detail than a threat update was developed to provide the recipient with an enhanced level of detail concerning fraud trends identified by NFIB as well as relevant prevention advice. **The formalisation** of the definition of sectors and possible expansion of definitions in terms of including sub-sectors will provide a more comprehensive understanding of the reach of NFIB products which will enable more effective analysis.

Recommended Action: **NFIB, in conjunction** with various business areas, are to formalise and define the various types of stakeholder sectors and sub-sector groupings to be used in all business areas within ECD. Consultation among relevant parties (Including stakeholder manager and a BPT representative) within ECD will be required in order to accomplish an agreement on sector definitions to be adopted. A sector definition model currently used by the NFA could be evaluated to assist in completing this action.



KPI 2.1 Impact and reach of strategic intelligence dissemination

Measures: 3) Survey Monkey feedback responses, regarding Monthly Threat Updates

Breakdown of the NFIB Survey Monkey Feedback for Q2 regarding the quality of each of the strategic intelligence disseminations

Monthly Threat Updates (Oct, Nov & Dec 2012 disseminations)

18 responses overall

45% (10 respondents) - Overall positive response - public and private sector respondents were able to use the threat update to take a direct operational or policy decision, which helped to reduce the threat of fraud within their organisation.

22% (6) - Moderate satisfaction - respondents felt the threat update provided at the very least, useful background information / corroboration.

33% (3) - No value – felt no value was gained from threat update

Analysis and recommended action for NFIB

- **A number of the respondents** confirmed that the Threat Update led to the organisation providing an alert or warning action to their stakeholders / community, and also went on to comment that although the content was very useful and had good coverage it would be beneficial to include an update on the new regional anti-fraud capability.

- **Respondent dissatisfaction** was linked to the Threat Update providing non specific and sometimes irrelevant information/intelligence and as a result it does not really say anything that stakeholders do not already know.

• **The overall perception** of the Q3 NFIB strategic intelligence products disseminated is **positive** - much of the feedback confirms that stakeholders are able to use the products to make operational and / or policy decisions, which help reduce the overall fraud threat within their organisation.

• **29% of stakeholders** could neither agree nor disagree if the Strategic Intelligence NLF disseminates is relevant and **37%** could not decide if it had increased their ability to determine key threats and the strategy to counter them. This suggests that stakeholders do not fully understand what 'Strategic Intelligence' actually covers.

• **Dissatisfied stakeholders** felt that the subject matter was not always relevant to their organisation, and where it was relevant, it was not specific enough to allow recipients to respond directly to any particular threats identified, but simply provided useful background information.

Recommended Action (from Survey Monkey and Stakeholder survey feedback analysis):

1) Review the Monthly Threat Update to ensure relevance of the information to the recipient organisations and also to ensure that the information/intelligence provided in the Update is focussed with evidence of emerging threats rather than that of a general Fraud Bulletin.

2) NFIB are to determine the impact of the Monthly Threat Update on different sectors and where possible, tailor advice. Tailoring the products disseminated may address the low response rate of feedback with regards to the strategic products.

3) BPT, in conjunction with the NFIB, to refine the survey question that relates to the quality of 'Strategic Intelligence', to ensure that both NLF and stakeholders know exactly what is covered by the term 'Strategic intelligence', thus allowing for more accurate and relevant feedback to be obtained.

KPI 2.2 Impact and reach of operational intelligence dissemination

NFIB

Measures: 1) Responses from Wave 1 & 2 independent 6 monthly stakeholder survey, regarding **operational intelligence**
2) Volume of NFIB operational intelligence disseminations during Q1 & Q2 (including Q2 monthly breakdown)

Operational intelligence disseminations include: Intelligence summaries and analytical products

Impact of the intelligence products

Wave 1 & 2 Stakeholder Survey (20 respondents from forces and Government LEAs)

‘The operational intelligence NLF disseminates is of a high quality and is relevant’

Total agreeing: 65% (13 respondents)

Total disagreeing: 5% (1)

Neither agree nor disagree: 30% (6)

Comment: The majority of stakeholders are in agreement that the information disseminated is of high quality. One Police Force stated they disagreed with the above because most of the information was not actionable.

‘This operational intelligence has improved your ability to prevent and investigate fraud?’

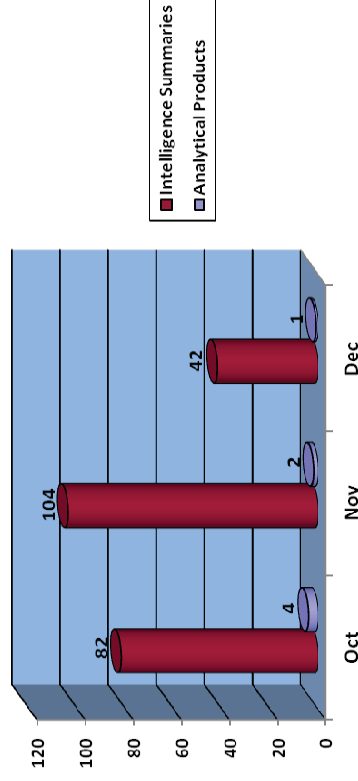
Total agreeing: 65% (13 respondents)

Total disagreeing: 5% (1)

Neither agree nor disagree: 30% (6)

Comment: Government LEA stakeholders agreed strongly that the operational intelligence received was useful in preventing & investigating fraud within their organisations. One Police Force did not doubt that they receive this information but questioned what the Police service can actually do with it. This does not reflect badly on CoLP or NLF who are providing it; it is just information and intelligence that they say they cannot work on.

Volume of Operational intelligence disseminations – Q3 2012/13



	Q1 11/12	Q2 11/12	Q3 11/12	Q4 11/12	Q1 12/13	Q2 12/13	Q3 12/13
Intelligence Summaries	0	23	23	0	24	315	228
Analytical Products	0	0	4	0	13	12	7
TOTAL:	0	23	27	0	37	327	235

Comment:

- The volume of NFIB intelligence summaries disseminated during Quarter 3, as compared with Q2 has decreased, as have the disseminations of Analytical Products, however this is still significantly higher than the previous financial year and that of Q1 2012/13.

KPI 2.2 Impact and reach of operational intelligence dissemination

NFIB

Measures: 3) Breakdown by sector of operational intelligence reach – Source: NFIB

Breakdown by sector of the operational intelligence products disseminated during Q3

Reach of the intelligence products

	Volume of analytical products disseminated	Volume of intelligence summaries disseminated
Police Forces	3	88
Private Sector (inc Trade Bodies	3	2
Government & Government LEA	1	5
RIU Forces	1	3
Internal ECD	0	165

Analysis and recommended action for NFIB

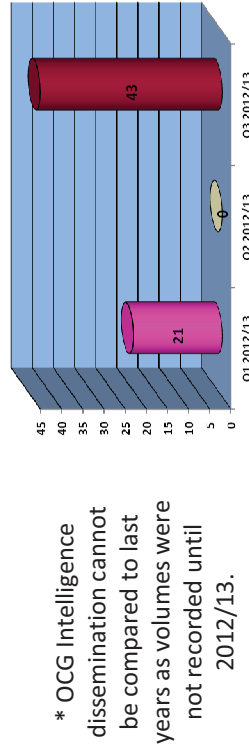
- **The volume of intelligence** summaries disseminated during Q3 has decreased by 92 compared to Q2, which suggests that further resources could be applied by NFIB to this area during the last financial quarter. It should be noted that during Q2 a number of intelligence summaries (mainly regarding DVLA) were identified as not being suitable and relevant to their target audience, therefore they did not wish to receive them in future; this would account for the decrease in volume of intelligence summaries disseminated.
 - **Notably, a significant proportion** of the intelligence summaries (165), have been **disseminated internally within NLF**, showing a greater emphasis on NLF specific intelligence, as compared with intelligence disseminations to other forces and government LEAs.
 - **Although there** has also been a decrease in the number of analytical products disseminated compared to Q2, due to the nature of work conducted by NFIB the figures will fluctuate between periods.
 - **65% of stakeholders**, are in agreement that the operational intelligence disseminated is of high quality and that the information has improved their ability to prevent and investigate fraud. Dissatisfaction was expressed by only one Police Force that stated they disagreed because most of the information was not actionable. The remaining stakeholders surveyed, were unable to comment, which implies that they didn't receive any operational intelligence.
- Recommended Action:**
- 1) **Consideration should** be given as to whether the independent stakeholder survey is the most appropriate way to assess the quality of NFIB operational intelligence disseminations. It is suggested that a more representative sample of *actual* recipients should be identified & feedback obtained, to ensure the NFIB receives a more valuable insight in to the quality of disseminations.
 - 2) **Ensure the** relevance and suitability of intelligence disseminations are sent to the appropriate target audience.
 - 3) **Further engagement with stakeholders** to ensure that they are receiving useful and relevant intelligence and tailoring our service to become sector specific. Ensure that the volume of analytical products and intelligence summaries disseminated **remains high and consistent**.
 - 4) **Business Performance team** to include in the survey the option for respondents to indicate they did not receive an operational intelligence product.

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KPI 2.3 Impact and reach of OCG intelligence dissemination

NFIB

Volume of OCG Intelligence Dissemination - Q1, Q2 & Q3 2012/13



Measures:

- 1) Responses from Wave 1 & 2 independent 6 monthly stakeholder survey, regarding **OCG intelligence disseminations**
- 2) Volume of NFIB OCG intelligence disseminations during Q1 & Q2

Wave 1 & 2 Stakeholder Survey (20 respondents from forces & Government LEAs)

'The intelligence NLF disseminates on OCGs (organised crime groups) is of a **high quality** and is relevant?'

Total agreeing: 35% (7 respondents)

Total disagreeing: 5% (1)

Neither agree nor disagree: 60% (12)

Comment: Only Police Forces and other Law Enforcement Agencies were asked this question, with 10 out of the 11 Police Forces indicating strongly that they don't believe it has impacted either positively or negatively. One other Law Enforcement Agency who did not agree with the above statement acknowledged the hard work that goes in to identifying Organised Crime Groups however, stated that the timeliness of them is questionable.

'This OCG intelligence has **improved your ability** to **disrupt** the OCGs you own?'

Total agreeing: 25% (5 respondents)

Total disagreeing: 10% (2)

Neither agree nor disagree: 65% (13)

Comment: There is mixed opinion as to the degree of impact the OCG intelligence has. 6 out of 9 LEAs agree that the OCG intelligence has improved their ability to disrupt the OCGs they own compared to only 1 out of 11 Police Forces who agreed.

Analysis

• **The increase of 43 OCG intelligence disseminations** produced in **Q3** by NFIB were all designated Operation RICO disseminations. Assigned as the dedicated lead for Operation RICO NFIB have subsequently assisted by enriching the said operation with a high number of OCG intelligence disseminations.

Ingesting the whole data set would be of great benefit and would mean that any nominal check against know fraud would also be checked against the national Fraud OCG data set and as such any disseminations would identify a link to an OCG. An alternative process would involve the OCCF facilitating access to the data set. Negotiations concerning an agreement to implement this particular process are still at an early stage.

With regards to NFIB crime disseminations, a criteria has been identified for identification of OCG's, which will involve a brief training programme for the crime reviewers, however any identification would still need to be cross checked against the national fraud data set.

NFIB have recently began a recruitment process to employ an OCG analyst to provide additional support in relation thematic work, conducted as well as the above it will include engaging with the CFC to facilitate further sharing of their data.

• Of the combined responses from the Wave 1 & 2 Stakeholder Surveys, a significant number of respondents (25 out of 40) **had not received OCG intelligence** to allow them to comment.

• Only one force out of the 11 surveyed in Wave 2 had received OCG intelligence to be able to comment. This force agreed it was of a high quality & was relevant, meaning they were able to use the intelligence to help disrupt the OCG(s) that they own.

Recommended Action:

1) **Consideration should be given** as to whether the independent stakeholder survey is the best way the record the quality of OCG disseminations in the future.

2) **NFIB are still in the process** of negotiating with partner agencies in relation to the ingest of the complete set of Fraud OCG data to be ingested into know fraud. The Know Fraud system is currently protectively marked as restricted, however some agencies 'data is confidential and therefore NFIB cannot offer the protection they seek. Recommend NFIB to provide a date for completion of this work.



Key Performance Area 3

Enforcing and disrupting economic crime at the local, regional and national levels

KPI 3.1 £ value of criminal asset denial through to recovery (end to end process) Ops Delivery (ART)

Measures: 1) Volume of Confiscation Orders & cash seizures in 2011/12 & Q1 & Q2 (2012/13), & volume of all other asset recovery orders-Q2

2) Breakdown, by asset recovery action type, of £ value of criminal asset denial by Quarter

Source – Asset Recovery Team

Volume of Confiscation Orders & Cash Seizures – 2011/12 – 2012/13

Volume	Q1 11/12	Q2 11/12	Q3 11/12	Q4 11/12	Q1 12/13	Q2 12/13	Q3 12/13
Confiscation Orders:	0	7	8	13	18	9	8
Cash Seizures:	5	9	14	17	14	10	16

Total £ Value of Asset Denial & Recovery - 2011/12 – 2012/13

ASSET BY TYPE	Q1 2011/12	Q2 2011/12	Q3 2011/12	Q4 2011/12	Q1 2012/13	Q2 2012/13	Q3 2012/13
Compensation awarded to Victims	£0	£120,000	£2,385,113	£462,309	£1,307,625.88	£93,486.78	£0
Civil Recovery Orders	£0	£1,600,000	£0	£0	£0	£0	£0
Cash Forfeiture Orders (non POCA)	£0	£3,670	£0	£0	£1300	£0	£0
Cash Forfeiture Orders (POCA)	£13,240	£0	£45,065	£18,310	£7200	£109,885.98	£79,137.27
Confiscation Orders	£0	£182,911	£2,910,619	£895,185	£2,320,369.55	£562,092.78	£456,338.51
Cash Seizure First Application (POCA)	£14,500	£207,015	£3,223,771	£317,190	£277,120	£30,430	£604,575.82
Restraints	£2,500,000	£6,412,000	£1,510,000	£0	£0	£81,000	£470,000

Total Volume of Asset Denial & Recovery – 3rd Quarter 2012

Civil Recovery Orders	Cash Forfeiture Orders (non POCA)	Cash Forfeiture Orders (POCA)	Confiscation Orders	Cash Seizure First Application (POCA)	Restraints	TOTAL FOR 3rd Quarter 2012
0	0	6	8	16	5	35

TOTAL ASSETS RECOVERED

1st Quarter 2012/13 = £2,328,869.55

TOTAL ASSETS RECOVERED

2nd Quarter 2012/13 = £671,978.76

TOTAL ASSETS RECOVERED

3rd Quarter 2012/13 = £535,475.78

KPI 3.1 £ value of criminal asset denial through to recovery (end to end process)

(IFED)

Measures: 1) Volume of Confiscation Orders & cash seizures in 2011/12 & Q1 & Q2 (2012/13), & volume of all other asset recovery orders-Q2
2) Breakdown, by asset recovery action type, of £ value of criminal asset denial by Quarter

Source – IFED

Volume of IFED Confiscation Orders & Cash Seizures – Q3 2012/13

Volume	Q3 2012/12
Confiscation Orders:	1
Cash Seizures:	0

Total £ Value of IFED Asset Denial & Recovery – Q3 2012/13

ASSET BY TYPE	Q3 2012/13
Compensation awarded to Victims	£9490
Civil Recovery Orders	£0
Cash Forfeiture Orders (non POCA)	£0
Cash Forfeiture Orders (POCA)	£0
Confiscation Orders	£8290
Cash Seizure First Application (POCA)	£0
Restraints	£0

Total Volume of IFED Asset Denial & Recovery – Q3 2012/13

Civil Recovery Orders	Cash Forfeiture Orders (non POCA)	Cash Forfeiture Orders (POCA)	Confiscation Orders	Cash Seizure First Application (POCA)	Restraints	TOTAL FOR 3rd Quarter 2012
0	0	0	1	0	0	1

IFED TOTAL ASSETS RECOVERED
3rd Quarter 2012/13 = £8290.00

KPI 3.1 £ value of criminal asset denial through to recovery (end to end process)

Measures: 1) Volume of Confiscation Orders & cash seizures in Q3 (2012/13), & volume of all other asset recovery orders-Q3
2) Breakdown, by asset recovery action type, of £ value of criminal asset denial by Quarter

Source – DCPCU

Volume of DCPCU Confiscation Orders & Cash Seizures – Q3 2012/13

Volume	Q3 2012/12
Confiscation Orders:	0
Cash Seizures:	2

Total £ Value of DCPCU Asset Denial & Recovery – Q3 2012/13

ASSET BY TYPE	Q3 2012/13
Compensation awarded to Victims	£0
Civil Recovery Orders	£0
Cash Forfeiture Orders (non POCA)	£0
Cash Forfeiture Orders (POCA)	£1,100
Confiscation Orders	£0
Cash Seizure First Application (POCA)	£0
Restraints	£0

Total Volume of DCPCU Asset Denial & Recovery –Q3 2012/13

Civil Recovery Orders	Cash Forfeiture Orders (non POCA)	Cash Forfeiture Orders (POCA)	Confiscation Orders	Cash Seizure First Application (POCA)	Restraints	TOTAL FOR 3rd Quarter 2012
0	0	0	1	0	0	1

DCPCU TOTAL ASSETS RECOVERED
3rd Quarter 2012/13 = £1,100

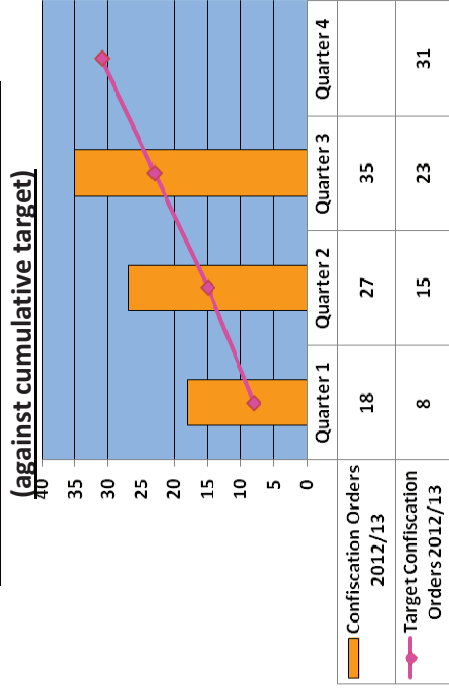
CoLP Proportion= £550

Ops Delivery (ART)

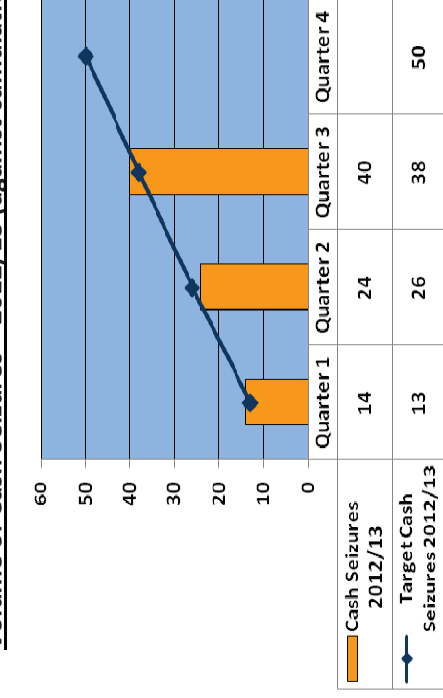
KPI 3.1 £ value of criminal asset denial through to recovery (end to end process)

ART Target: To increase the volume of confiscation orders by 10% and cash seizures to 50.

Volume of Confiscation Orders – 2012/13



Volume of Cash Seizures – 2012/13 (against cumulative target)



Baseline
Volumes 2011/12

Confiscation
Orders Total: 28

Cash Seizures
Total: 45

Analysis and recommended action for ART

TARGET: The Asset Recovery Team are **currently performing very well** in relation to the volume target for Confiscation Orders, as they are **12 orders over the cumulative target for the end of Q3**, and have already exceeded the target milestone for the end of year. The figures suggest that the ART will greatly exceed the overall target set for 2012/13.

•The £ value of confiscation orders forms a significant part of the quarterly total for assets recovered. **In Q3 2012/13, the total assets recovered during the period was £543,475.78**, of which **£464,338.51** was attributable to confiscation orders. **The Q2 Total Assets Recovered figure was: £671,978.76** which is slightly higher than the Q3 total for 2012/13.

•**In relation to cash seizures**, the ART, are **above target at the end of Q3** having completed 40 seizures to date; the cumulative target for the end of Q3 was set at 38. The figures indicate that the ART will achieve the target of achieving 50 cash seizures by the end of Q4 2012/13.

•The Asset Recovery team are continuing to promote awareness of POCA legislation within NLF, and the wider investigation community within ColP, which has undoubtedly assisted with increasing the volumes of cash seizure carried out. However it should of course be noted, that *the opportunity* to seize cash from criminals, is heavily dependant on a number of external factors, which fall outside the control of NLF investigators.

Recommended Action:

- 1) ECD, uniformed policing and serious crime senior management team to continue to promote the effective use (& submission to the ART) of the **Criminal Asset Assessment forms** force-wide.
- 2) ECD SMT to ensure the use of **Referral Forms** within ECD at the end of investigations, to ensure that every opportunity for criminal asset denial is taken.

KPI 3.2 £ value of future fraud disrupted by NLF Enforcement Cases

Ops Delivery / IFED/DCPCU/ BPT

Measure: 1) All Aspects of the enforcement process, including the **volume of detected cases** during 2012/13 to date, the **£ value of money obtained or attempted**, and the period of time (number of days) over which the fraud was committed.

£ Value of future fraud disrupted - Calculation Rationale

Average rate of fraud loss per day (less top & bottom 5%) X Number of detected cases X Average Sentencing (in days) per case (2011/12)

- **Introduction:** A review of KPI 3.2 has highlighted an error in the calculation used to return the Q1 and Q2 “£ value of future fraud disrupted by NLF enforcement cases.” This has been rectified and the previous quarters re-calculated. This has resulted in the values for Q’s 1 and 2 being significantly revised upwards.
- **This report now includes a separate KPI 3.2** value for IFED and DCPCU. However for comparison purposes I have also included a return based on the rationale used in previous quarters, where fraud team & IFED are combined. The inclusion of DCPCU and treating IFED in isolation for the purposes of ROI has presented a challenge in deciding which KPI 3.2 value to use in the ROI as old and new methods of calculating the return produce significantly different values.
- **The first section corrects** the values for the previous quarters in respect of the Fraud teams and MLIU and IFED and provides the cumulative position for comparison against other quarters.

Fraud teams & MLIU

Quarter Comparison – Q1, Q2 & Q3 2012/13

<u>Fraud Teams & MLIU</u>	<u>Q1 2012/13</u>	<u>Q2 2012/13</u>	<u>Q3 2012/13</u>
Volume of cases:	14	20	20
Average rate of fraud:	£3,877.15	£23,158.79	£41,716.41
Average sentence:	353.81	353.81	353.81
£ value of future fraud disrupted by enforcement cases:	£19,204,842.18 (Original value - £4,295,184.31)	£163,876,229.79 (Original value 36,651,101.05)	£295,193,660.44

Cumulative Position – Q1, Q2 & Q3 2012/13

<u>Fraud Teams & MLIU</u>	<u>Q1 2012/13</u>	<u>Q2 2012/13</u>	<u>Q3 2012/13</u>
Volume of cases:	14	34	54
Average rate of fraud:	£3,877.15	£6,363.20	£41,988.19
Average sentence:	353.81	353.81	353.81
£ value of future fraud disrupted by enforcement cases:	£19,204,842.18 (Original value - £4,295,184.31)	£76,553,706.94 (Original value £17,119,680.54)	£802,215,441.21

KPI 3.2 £ value of future fraud disrupted by NLF Enforcement Cases

Measure: 1) All Aspects of the enforcement process, including the **volume of detected cases** during 2012/13 to date, the **£ value of money obtained or attempted**, and the period of time (number of days) over which the fraud was committed.

IFED

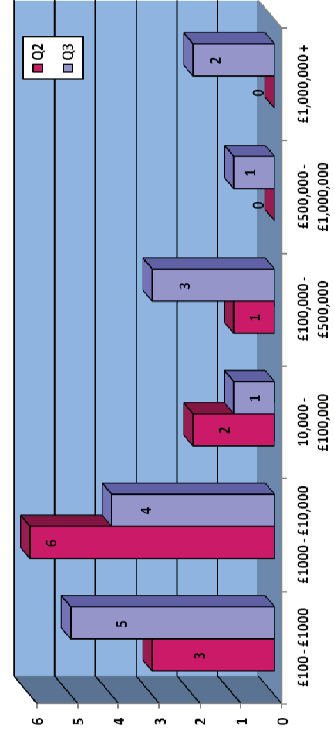
Quarter Comparison – Q1, Q2 & Q3 2012/13

IFED	Q1 2012/13	Q2 2012/13	Q3 2012/13
Volume of cases:	20	17	22
Average rate of fraud:	£2,554.62	£3,232.81	£9,827.59
Average sentence:	88.45	88.45	88.45
£ value of future fraud disrupted by enforcement cases:	£4,519,122.78 (Original value - £1,010,607.67)	£4,861,014.75 (Original value - £1,087,065.00)	£19,123,507.38

Cumulative Position – Q1, Q2 & Q3 2012/13

IFED	Q1 2012/13	Q2 2012/13	Q3 2012/13
Volume of cases:	20	37	59
Average rate of fraud:	£2,554.62	£3,320.39	£41,988.19
Average sentence:	88.45	88.45	88.45
£ value of future fraud disrupted by enforcement cases:	£4,519,122.78 (Original value - £1,010,607.67)	£10,866,474.33 (Original value - £2,430,060.62)	£23,249,944.88

- **The reason for the considerable increase** in values is due primarily to revising up the average sentence for 2011-12. The average sentence, which now equates to just short of one year imprisonment per case finalised at court with a custodial sentence in 2011-12 is correctly recorded as **£353.81** and not **£79.13** as was used in the previous quarter's calculation. This may be more reflective of the true position.
- **In Q1 the average sentence used** for IFED was calculated as 25% of the Fraud teams and MLIU average sentence to reflect the number of IFED cases resulted with a caution. This equated to **19.78 days**. The revised IFED average sentence is again 25% of the Fraud teams and MLIU average sentence equating to **88.45 days**.
- **The average sentence in 2011-12** is considerably higher than 2010-11 as the sentence in days total, per annum (based on the lowest sentence in multiple defendant cases ÷ 2 to reflect Criminal Justice Act 03 (half sentence served) in 2011-12 is divided by fewer cases - **316 in 2010-11 and 80 in 2011-12** hence a much higher average per case. The comparison highlights the correlation between cases and sentencing may not be right and a further review is required to ensure the average sentence reflects the actual position.
- **In addition to the average sentence increase** another factor influencing the increase in the Fraud teams KPI value in Q3 is the number of high value cases with a high average rate of fraud outcome. To illustrate the point the below table compares the average rate of fraud values used to calculate the Fraud team and MLIU cumulative average rate of fraud in Q's 2 and 3.



NB: This does not constitute all cases in period. Other cases in both periods have average rates of fraud below £100 or are an entry denoting an NFRC forming part of an investigation where the values have already been recorded and therefore have a £0.00 value.

KPI 3.2 £ value of future fraud disrupted by NLF Enforcement Cases

Measure: 1) All Aspects of the enforcement process, including the **volume of detected cases** during 2012/13 to date, the **£ value of money obtained or attempted**, and the period of time (number of days) over which the fraud was committed.

Quarter by quarter combined £ value comparison

- In **quarters 1 and 2** the figure calculated for the directorate KPI 3.2 value that was then used in the Return on Investment (KPI 5.1) calculation was based on combining the Fraud teams and MLIU cases with IFED cases and using the Fraud team and MLIU average sentence. The values for quarters 1 and 2 are below re-calculated using the correct average sentence. Using the same rationale, a quarter 3 value has been calculated for comparison.

Combined Fraud teams and IFED comparison - re-calculated with new average sentence by quarter	Q1 2012/13	Q2 2012/13	Q3 2012/13
Volume of cases:	34	37	42
Average rate of fraud:	£3,385.20	£6,326.21	£35,665.68
Average sentence:	353.81	353.81	353.81
£ value of future fraud disrupted by enforcement cases:	£40,722,398.80 (Original value £9,107,609 ¹⁾)	£82,816,225.32 (Original value £18,521,940 ²⁾)	£529,992,718.11 ³⁾

- ¹ Denotes KPI 3.2 value used in Quarter 1 ROI
² Denotes KPI 3.2 value used in Quarter 2 ROI
³ Using the formula used in previous quarters to calculate the Directorate KPI **3.2, this figure would be the Q3 return**. This figure is used in KPI 5.1 to provide a comparison with the suggested new method of calculating the ROI now the Funded Units are included.

Quarter by quarter combined cumulative £ value

- In **Q2 a cumulative position** was provided for Fraud team and MLIU cases combined with IFED cases and the adjacent table illustrates the cumulative position at the end of Q3.
- **The average rate of fraud** for the cumulative Q3 position for Fraud teams and MLIU and IFED cases is lower than Q3 only figure as more high value cases are removed in line with the top and bottom 5% rule.

Cumulative combined Fraud teams and IFED comparison - re-calculated with new average sentence by quarter	Q1 2012/13	Q2 2012/13	Q3 2012/13
Volume of cases:	34	71	113
Average rate of fraud:	£3,385.20	£3747.51	£14,562.77
Average sentence:	353.81	353.81	353.81
£ value of future fraud disrupted by enforcement cases:	£40,722,398.80 (Original value £9,107,609.78)	£94,139,362.43 (Original value £21,054,373.00)	£582,227,262.86

KPI 3.2 £ value of future fraud disrupted by NLF Enforcement Cases

Ops Delivery / IFED/DCPCU/ BPT

Measure: 1) All Aspects of the enforcement process, including the **volume of detected cases** during 2012/13 to date, the **£ value of money obtained or attempted**, and the period of time (number of days) over which the fraud was committed.

Quarter 3 Investigative teams by volume and value

- As mentioned earlier in the report, DCPCU are now included within KPI 3.2 and the following section deals with that departments KPI 3.2 values and for the first time treats IFED's KPI 3.2 separately in the ROI (KPI 5.1). DCPCU case volume is based on cases charged (not detected crimes as for Fraud teams/MLIU and IFED) but the difference does not affect the calculation. Due to the joint working structure of DCPCU the department value is divided by 2 to obtain the proportion attributable to CoLP. A bespoke average sentence was calculated for DCPCU. IFED's KPI 3.2 calculation remains as stated earlier.

	<u>Volume of detected cases</u>	<u>Average rate of fraud</u>	<u>Average sentence</u>	<u>£ value of future fraud disrupted by enforcement cases</u>
Fraud teams and MLIU	20	£41,716.41	353.81	£295,193,660.44
IFED	22	£9,827.59	88.45	£19,123,507.38
DCPCU	8	£4,289.43	204.75	£7,026,086.34
CoLP proportion of DCPCU total:				£3,513,043.17
Q3 Directorate KPI 3.2 total:				£317,830,210.99

Summary

- The inclusion of DCPCU and the formal separation of IFED from the calculation brings the difficulty of knowing which figure to use as the Q3 KPI 3.2 return. The below table illustrates the difference:

<u>Rationale used</u>	<u>Q3 KPI 3.2 return</u>
Fraud teams and MLIU and IFED combined (Previous method):	£529,992,718.11
Fraud teams and MLIU, IFED and DCPCU calculated separately and added together (New method):	£317,830,210.99

- If the method from previous quarters is used the Q3 KPI 3.2 value is significantly higher than the sum of the three departments individual KPI 3.2 values. However the effects of both values vary when included in the ROI calculation and this is explored in KPI 5.1.

Measure: 1) All Aspects of the enforcement process, including the volume of detected cases during 2012/13 to date, the £ value of money obtained or attempted, and the period of time (number of days) over which the fraud was committed.

Summary continued

- It appears the new method is providing a more realistic return and as the funded units will want there own bespoke KPI 3.2 and ROI values is perhaps the better option. Therefore on this basis it is suggested the KPI 3.2 value for Q3 2012-13 is:

<u>Number of cases Charged/cautioned</u>	<u>£ value of future fraud disrupted by ECD enforcement cases</u>
50	£317,830,210.99

NB – No cumulative value can be obtained as DCPCU were not included in previous quarters and the inclusion of DCPCU means no comparison can be made with previous quarters.

Recommended Action:

- This is the third calculation of KPI 3.2 in the KPA regime and it is clear that the final value can be influenced by a number of factors. For example the number of cases is affecting the average sentence and average rates of fraud can be significantly increased by a small number of high value cases in the period. BPT recommend an in-depth review and consultation period to further refine the assumptions and formula and consider the inclusion of OACU. The formula needs to be stabilised before we enter the new financial year to ensure credible and reasonable values can be compared quarter by quarter.

KPI 3.3 % CoLP Fraud OCGs in top bands whose intent / capability and criminality has been reduced by CoLP interventions

NFIB / Ops Delivery

Measure: 1) Volume of Fraud Organised Crime Groups in Tiers 1-4

OCG Tier	Volume as at 31/10/12	Volume as at 30/11/12	Volume as at 31/12/12
Tier 1 - Comprehensive Operational or Investigative Intervention	2	3	4
Tier 2 - Limited Plan/Action that Prevents or Disrupts	87	87	83
Tier 3 - Proactive Intelligence Development	0	0	0
Sub Total:	89	90	87
Tier 4 - Developing Opportunities for Action	81	81	86
TOTAL:	170	171	173

OCGS DISRUPTED IN QUARTER 3	OCG ID Number	TEAM
CR/2141/08 – Operation Trail	48/00060	Team 5
CR/7495/10 OCG ID NUMBER	NFIB00070	Team 2
CR/2538/11 & CR/5835/11	NFIB00107	Team 1
CR/3513/10 – Operation	NFIB00004	MLIU
CR/5865/10 – Operation Rejoin	NFIB/00040	Team 2
CR/2751/08 7 CR/7597/10 - Sundial, Slater & Songlark -	48/00003	Asset Recovery
CR/0481/08 – Operation Timpani	48/00049	Team 1
CR/2985/09 – Operation Slick	48/00070	Team 3
CR/7083/09 – Operation Blackout	48/00129	MLIU
CR/6478/12 – Operation Lupine	NFIB/00173	Team 4

DCPCU disruptions – Q3 2012/13

DCPCU - OCGS DISRUPTED IN QUARTER 3	Date referral received:	Volume of arrests:
Op DIPLOCK	09/01/2012	6 on 04 /12/2012
Op BARATHEON	13/01/2012	2 on 02/05/2012
Op CALVINO	16/01/2012	2 on 27/02/2012
Op FUSILLI	23/01/2012	3 on 23/02/2012
Op SCARMAN	06/02/2012	10 on 08/03/ 2012 onwards
Op MONCHINO	04/04/2012	1 on 11/04/12
Op PUCCINI	19/04/2012	10 from 15/10/2012 onwards
Op ORZO	27/04/2012	3 on 23/05/2012

KPI 3.3 % CoLP Fraud OCGs in top bands whose intent / capability and criminality has been reduced by CoLP interventions

NFIB / Ops Delivery

Measure: 1) Volume of Fraud Organised Crime Groups in Tiers 1-4

Analysis and recommended action

TARGET: To 25% of CoLP OCGs who use fraud as a means of stealing from individuals, businesses and the public sector

- Based on this target, the **target amount of OCG disruption activity in 2012/13 is 24**. The target figure was originally calculated, using the aggregate of OCGs in tiers 1 – 3 as of April 2012. A disruption is counted when an OCG is reclassified in a downward movement in tier (as per the above table)
- Since the start of 2012/13 - 20 OCG disruptions have been recorded**. This is **2 disruptions above the target** number for the end of Q3 (20).
- There will now be improved reporting in this area**. Force Intelligence Bureau (FIB), who now have responsibility for managing all CoLP OCGs have introduced an OCG panel who oversee the quality of work against organised crime. This includes oversight of the OCG mapping process. This process requires that officers submit a claim form which is then reviewed at an OCG monthly meeting and ratified accordingly.

Recommended action:

- 1) Assign a set objective to all relevant officers to ensure that OCG disruption claim forms are completed and submitted to FIB when applicable in order to embed the new OCG disruption management process.
- 2) Details of OCG intervention activity should continue to be reported within the team tasking meetings, in order to ensure that an accurate picture of all OCG disruption activity undertaken by NLF is acknowledged, and communicated to the FIB, to ensure this is reflected in the figures. [\(as tasked in Q2\)](#)

KPI 3.4 Quality of investigation and enhancing judicial outcomes

Ops Delivery / IFED /
DCPCU / BPT

Measure: 1) Number of suspects charged, guilty pleas, disposals, length of sentence

Source – Case Support

Key Volumetrics – 2011/12 – 2012/13

	Q1 2011/12	Q2 2011/12	Q3 2011/12	Q4 2011/12	Q1 2012/13	Q2 2012/13	Q3 2012/13
No. of Suspects Charged	38	33	23	33	18	45	56
Guilty Pleas	7	6	25	11	16	18	8
Disposals/ Finalised cases	32	47	33	29	30	33	18
Total length of Sentence (Months)	533	1021	507	810	623	769	756

DCPCU & IFED Key Volumetrics – 2011/12 – 2012/13

	DCPCU	IFED
Suspects Charged	19	2
Guilty Pleas	11	5
Disposals/ Finalised Case	6	5
Total Length of Sentence (Months)	109	25

Analysis and recommended action

• **The volume of guilty pleas** has decreased in Q3 compared to Q2 however the reduction is commensurate with the reduction in completed cases and on its own is not a cause for concern. The number of cases finalised at court is down 31 on this period last year which may warrant explanation.

Recording Quality of investigations:

• **As present, there is further refinement work** to be done regarding how best to reflect the quality of NLF investigations. The action to liaise with Operational Delivery SMT was not fully completed in the period. Measuring the quality of our investigations remains a difficult area and Operational Delivery's knowledge and experience is crucial in pursuing the best measures for this KPA.

• **One measure being developed** is the joint CoLP/CFG initiative to reflect the quality of NLF investigations by the number of files returned by CFG for qualitative reasons. The initiative is part of the on-going Sharepoint project that has been delayed due to a lack of resilience in the Force to create and manage Sharepoint. The recording of cases in Sharepoint is an essential element of the CoLP CFG initiative and this requires a significant back record conversion of cases and suspects. The Sharepoint project offers valuable opportunities of centralising case data that will revolutionise the collection and reporting of management data relating to investigations as well as providing a crucial link with CFG. Once the cases and suspects are recorded within Sharepoint the pilot phase mentioned in the Q2 report will take place.

Recommended Action:

- 1) The Operational Delivery** (Heads of department) to identify aspects of an investigation and actions carried out by investigators that can be used as performance measures for quality of investigations. Utilise the CPS representative.
- 2) The Business performance** team to progress the SharePoint build for recording CFG feedback and provide a date for completion.



Key Performance Area 4

Raising the standard of economic crime prevention and investigation nationally by providing education and awareness to our counter-fraud community

KPI 4.1 Impact and reach of training strategy and delivery

Academy

- Measure 1) Responses from Wave 1 & 2 independent 6 monthly stakeholder survey, regarding the quality of fraud prevention training
- 2) Responses from the Fraud Academy Course Feedback Questionnaire, regarding course satisfaction.

Target: To ensure that 85% or more people attending the Fraud Academy courses are very satisfied overall with the quality and content of courses attended.

Wave 1 & 2 Stakeholder Survey (65 respondents asked)

‘In the last 12 months the Academy has provided relevant and high quality training’

Total agreeing: 46% (30 respondents)

Total disagreeing: 5% (3)

Neither agree nor disagree: 49% (32)

Comment: A large proportion of stakeholders surveyed believe NLF provided relevant and high quality training and satisfaction rates were highest among Government and Law Enforcement Agencies. One Private Sector agency who did not agree commented that NLF’s expertise in the market has not been established yet, also stating that the courses run in the Fraud Academy are average and not yet the cutting edge lead courses in the country.

‘In the last 12 months, this (the training) has increased your capability to prevent and investigate fraud’

Total agreeing: 37% (24 respondents)

Total disagreeing: 7% (4)

Neither agree nor disagree: 57% (37)

Comment: 37% of stakeholders believe that Fraud Academy training has increased their capacity to prevent and investigate fraud. Encouragingly both awareness and usage has increased from Wave 1 to Wave 2. The low percentage of dissatisfaction expressed by those surveyed was that of a very small number of agencies from the Private Sector, Trade Body and Charity. Satisfaction rates were highest among Government and Law Enforcement Agencies.

Analysis and recommended action

•**TARGET:** The academy target is measured on the responses from the NLF Fraud Academy Course Feedback questionnaire completed by NLF course delegates following the completion of their course.

•The **cumulative figure** (Q1, Q2 & Q3 combined) of NLF course delegates that have completed the feedback questionnaire is **82%. This is currently below target**, however a number of feedback forms from a ‘Bribery & Corruption’ course conducted have yet to be returned and are expected to be received at a later date. The % of returns for December will be higher once these feedback forms have been returned.

•The **cumulative figure** of delegates that have found the CONTENT and QUALITY of the NLF courses to be either Excellent, Good or Very Good and who are overall satisfied is **95%, which exceeds the target of 85% or above**.

•The **results of the independent stakeholder** survey of key NLF stakeholders also helps to give an accurate picture of the quality and relevant of NLF courses. Given that the Wave 1 stakeholder survey, was not representative of all NLF key stakeholders, the results of Wave 1 & 2 surveys have been combined to provide a year to date figure. Wave 2 survey included 11 Police force stakeholders.

•The feedback from the stakeholder surveys suggests that NLF courses are highly relevant and useful to most fraud investigators. However, although a large majority of stakeholders were aware of the training NLF offers, only a small percentage of stakeholders had actually attended a training course.

Recommended Action:

1) Fraud Academy to develop a feedback process, which involves contacting the line managers of NLF course delegates a short period after the course takes place to assess/measure if the course has subsequently offered value to their organisation.

2) Fraud Academy to establish who the competitor training providers are and why we are not being seen as the “most cutting edge”. Our knowledge base and remit should have us ranked highly if not the highest in this field.

Measure: 1) Responses from Wave 1 & 2 independent 6 monthly stakeholder survey, regarding NLF standard setting & sharing best practice

Wave 1 & 2 Stakeholder Survey (77 respondents asked)

In the last 12 months NLF has been highly effective in setting standards and sharing good practice:

Total agreeing: 57% (44 respondents)

Total disagreeing: 13% (10)

Neither agree nor disagree: 30% (23)

Comment: Over half of stakeholder respondents agreed that NLF had been effective at setting and sharing best practice. The majority of Home Office Government and Government expressed the highest satisfaction level amongst Stakeholders. However, when asked to comment why they gave this response only a very small number offered their thoughts. Home Office Government dissatisfaction relates to not receiving feedback on what the standards are that are being set. One Other/Charity agency commented that they disagree with the above statement because NLF's stakeholder management and how we go about informing and setting standards is not very well thought through in terms of what we are trying to communicate to which groups of stakeholders.

'In the last 12 months this has increased your capability to prevent and investigate fraud'

Total agreeing: 48% (37 respondents)

Total disagreeing: 8% (6)

Neither agree nor disagree: 44% (34)

Comment: Nearly half of stakeholder respondents agreed that the best practice guidance received had increased their capability to prevent and investigate fraud. Government and Private Sector stakeholders showed the highest satisfaction rate in their ability to prevent and investigate fraud as a result of being highly effective in setting standards and sharing good practice. One Law Enforcement agency who gave 'disagree' as their response went on to explain that although they disagreed with the statement, it was not a criticism, but a statement of fact. This is simply due to the type of fraud that they deal with, which is Tax Fraud. This is not within the remit of City of London Police or National Lead Force.

Analysis and recommended action

- Responses from Wave 1 & 2 stakeholder survey have been combined to give a more representative picture of the views of key NLF stakeholders.

- A significant number of key stakeholders have a good perception of the best practice disseminations they have received, with **half of stakeholders feeling that the guidance has improved their ability to investigate fraud**. This suggests that NLF has made significant progress in taking a lead force stance in guiding other forces and key industry partners in the most effective fraud prevention and investigations methods.

- However observations from stakeholders are that although NLF is information sharing, the processes and guidance documents could be more consistent. Stakeholders identified the need for NLF to provide a common standard for best practice, with all stakeholders, noting that the current standards setting process, can be somewhat disparate between private and public sectors.

- A significant number of respondents did not comment either way, and this suggests that there are a considerable number of stakeholders who are not currently receiving any standard- setting guidance from NLF. The reach of such disseminations could therefore be improved.

Recommended action:

- 1) Directorate head to determine** who contributes to and has the main responsibility for the setting of standards both internally and externally, so that the process of disseminating best practice can be made more effective. Consider the Fraud Academy's role in advising on, and disseminating best practice within NLF and externally.

- 2) Consider the successful** business model adopted by IFED, and draw out best practice ideas from this model, which could assist other NLF business areas.

- 3) All NLF departments** to contribute towards devising questions for the next Stakeholder Satisfaction Survey which are department specific, as this will ensure that the feedback received is targeted and specific to each business area.



Key Performance Area 5

**Delivering value and reassurance to our
community and partners in industry**

KPI 5.1 £ saved per £ spent (return on investment)

NFIB / Ops Delivery

Measure: 1) Financial value of the saving made through intervention activity against NLFs overall expenditure

- **Introduction:** The inclusion of DCPCU and IFED as a separate team in the ROI has presented a dilemma in calculating the ROI. Because this is the first time these teams have been considered in the calculation their inclusion in the directorate ROI can not be compared with previous quarters. The ROI has therefore been presented in two ways and a recommendation is made regarding the best to use.

Return on Investment - Calculation rationale

Total confirmed £ value of future fraud prevented by fraud-enabler disruption activity
+
Total £ value of assets recovered +
Total £ value of future fraud disrupted by enforcement cases =
Total £ 'Saved' +
Total spend at the end of the quarter =
Return on investment
£ saved per £ spent – Q3 2012/13

- The first table presents a ROI based on the method used in previous quarters with data corrected to take account of the revised KPI 3.2 figures. The budget figures have also been revised as Q1 erroneously included the National Fraud capability budget spend. This method excludes the funded units who in this instance would have to be treated separately. (Those teams ROI can be seen later in this section). The below method returns a Quarter 3 ROI as **£140.30** and the cumulative position as **£56.49**.

2012/13 quarter comparison & cumulative position

	<u>Q1 - 2012/13</u>	<u>Q2 – 2012/13</u>	<u>Q2 - cumulative position</u>	<u>Q3 – 2012/13</u>	<u>Cumulative position at end of Q3</u>
Total confirmed £ value of future fraud prevented by NFIB technological-enablers disruption activity <i>(see KPI 1.1):</i>	£1,274,676	£2,602,962	£3,877,638	£2,467,754.00	£10,223,030
Total £ value of assets recovered <i>(see KPI 3.1):</i>	£2,328,869.55	£671,978.76	£3,000,848.31	£543,475.78	£6,545,172.40
Total £ value of future fraud disrupted by enforcement cases <i>(see KPI 3.2 for calculation):</i>	£40,722,398.80	£82,816,225.32	£123,538,624.12	£529,992,718.11	£777,069,966.35
*TOTAL (to nearest £):	£44,325,944	£86,091,166	£130,417,110	£533,003,947.89	£793,838,169
Total spend by NLF at the end of the quarter:	£4,438,739	£3,506,329	£7,945,068	£3,798,811.00	£19,688,947
Return on investment for quarter (to nearest pence):	£9.98 (Original value £2.79)	£24.55 (Original value £6.42)	£16.41 (Original value £4.34)	£140.30	£56.49

KPI 5.1 £ saved per £ spent (return on investment)

NFIB / Ops Delivery

Measure: 1) Financial value of the saving made through intervention activity against NLFs overall expenditure

- **The below table** provides the ROI for each of the departments stated and then a ROI for the directorate by combining all data and applying the ROI calculation formula. This provides a realistic ROI taking into account the inclusion of the funded units and this figure is recommended by BPT as the directorate Q3 ROI and is the best way of reporting this figure in future.

Q3 2012/13 Return on investment by fraud team

	<u>Fraud teams & MLIU (inc NFIB)</u>	<u>IFED</u>	<u>DCPCU</u>	<u>Quarter 3 (all departments)</u>
Total confirmed £ value of future fraud prevented by NFIB technological enablers disruption activity (see KPI 1.1):	£2,467,754.00	£20,000.00	£13,426,287.00	£9,200,897.50
Total £ value of assets recovered (see KPI 3.1):	£535,185.78	£8,290.00	£550.00	£544,025.78
Total £ value of future fraud disrupted by enforcement cases (see KPI 3.2 for calculation):	£295,193,660.44	£19,123,507.38	£3,513,043.17	£317,830,210.99
*TOTAL (to nearest £):	£298,196,600.22	£19,151,797.38	£16,939,880.17	£334,296,567.77
Total spend by NLF at the end of the quarter:	£3,183,581.00	£615,230.00	£341,311.00	£4,140,122.00
Return on investment for quarter (to nearest pence):	£93.66	£31.12	£29.96	<u>£80.74</u>

Q3 Return on investment = £ saved per £1 spent
 $\text{£334,296,567.77} \div \text{£4,140,122.00}$
= £80.74

KPI 5.2 Overall satisfaction of community (including victims) and partners

in industry, with NLF economic crime services

Measure: 1) Responses from Wave 1 & 2 independent 6 monthly stakeholder survey, regarding overall satisfaction with NLF

Target: To achieve an increase in overall satisfaction level with stakeholders

Wave 1 & 2 Stakeholder Survey (77 respondents asked)

‘Over the last 12 months, taking into account all your experiences, please could you state whether you are **satisfied** or **dissatisfied with NLF’s overall performance**’

Completely, Very & Fairly Satisfied: 95% **(73 respondents)**

Fairly, very or completely dissatisfied: 1% **(1)** **Neither:** 4% **(3)**

Comment: Only one stakeholder (Government LEA) expressed dissatisfaction overall, which reflects very well on NLF. Overall, Stakeholders say that NLF “does what it says on the tin”. The high level of overall satisfaction suggests that whilst there are improvements to be made that will increase stakeholder perception in certain areas, these development areas, do not detract away from stakeholders’ overall positive view of NLF.

‘NLF is an effective partner in the fight against fraud’

Total agreeing: 95% **(73 respondents)**

Neither: 2.5% **(2)** **Total disagreeing:** 2.5% **(2)**

Comment: NLF is recognised by key stakeholders as an effective partner. One Other Government stakeholder who disagreed with the above statement went on to say that the principles they agree with but in practise, NLF is not there yet.

‘Do you think the work of NLF has **added value to your organisation** or sector over the last 12 months?’

Yes: 83% **(65 respondents)** **No:** 9% **(7)** **Unsure** 8% **(6)**

Comment: The majority of stakeholders commented that the good relationship and engagement we have with them is how we add value to their organisation.

Analysis and recommended action

• Responses from Wave 1 & 2 (combined) stakeholder surveys give a more representative picture of the views of key NLF stakeholders in 2012/13. Whilst overall levels of satisfaction are high, the survey results indicate that there are still a number of improvements to be addressed. We are establishing ourselves as the force that holds the expertise in Economic Crime, we engage well and have good relationships with our Stakeholders and they recognise that we have and still are making vast progress and improvements. The recognition that we are a work in progress will only last to a certain point and comments suggest that this is coming to an end. NLF needs to build its reputation and fulfil promises made, particularly in relation to NFIB.

TARGET: Wave 1 – Completely, very & fairly satisfied = 95% (35 out of 37 respondents) **Year to Date (Wave 1 & 2 combined) – Completely, very & fairly satisfied = 95%** (73 out of 77 respondents). **Shows NLF stakeholders perceptions have remained consistently high.**

Recommended Action:

- 1) RAISING AWARENESS** – Directorate head to set the parameters of the NLF function and ensure clear communication externally to cement NLF’s position in the wider police landscape.
- 2) The national coordinator** (CoLP) to publish national standard operating guidance to provide advice on the allocation of fraud crime and the national coordination of serious and complex fraud.
- 3) The national coordinator** (CoLP) to be the main conduit between the police service and the NCA in regards to fraud and economic crime matters.
- 4) PREVENTION ACTIVITY** – NFIB prevention desk to explore every opportunity and increase the amount of external presentations and workshops to members of the counter-fraud community. This will help raise the profile of NLF within the private sector.
- 5) ECD head of operations** to develop a process of standardised prevention advice amongst teams.

Measure: 1) Responses from Wave 1 & 2 independent 6 monthly victim surveys, regarding overall satisfaction with NLF

Target: To achieve an increase in overall satisfaction level with victims

NLF Victim Satisfaction

‘Taking the whole experience into account, are you satisfied, dissatisfied or neither with the service provided by the Police in this case?’

Wave 1 (107 victims)

Total completely, very & fairly satisfied: 89% (95)

Total dissatisfaction: 5% (5)

Neither: 6% (7)

Wave 2 (140 victims)

Total completely, very & fairly satisfied: 89% (124)

Total dissatisfaction: 5.5% (8)

Neither: 5.5% (8)

Comment: The number of victims surveyed has increased, whilst the percentage of overall satisfaction has remained consistent, which indicates a greater number of people are satisfied overall with NLF

Analysis and recommended action

Responses from Wave 1 & 2 stakeholder survey have been combined to give a more representative picture of the views of key NLF stakeholders.

TARGET: To achieve an **increase** in overall victim satisfaction

Wave 1 – Completely, very & fairly satisfied = 89% (95 respondents) Wave 2 - Completely, very & fairly satisfied = 89% (124 respondents)

- **Generally the feedback** from the second victim survey was very positive and complementary about the service provided by NLF officers and staff. Many felt that NLF officers demonstrated the upmost professionalism in their dealings with victims. Many commended the helpful and supportive approach adopted by the officers in the case, and case support officers. Overall, dissatisfaction was generally linked to a lack of regular case progress updates, which is something which can be improved. Additionally, a number of victims felt their case was progressed too slowly, feeling at times that certain aspects of the investigation had not been dealt with as efficiently as they should have been.

- **Dissatisfaction was linked** to victims not receiving enough information about their case, and to cases taking too long to be resolved. Generally however, victims commended the professional and efficient service provided by NLF officers and staff, feeling that an appropriate level of contact had been maintained throughout the investigation. Much of the victim satisfaction was linked to the end result achieved, which in most cases was a prosecution of the individuals involved. A significant number of victims highlighted how well they felt they had been treated throughout the investigation.

Recommended action:

1) Operational teams to provide victims with details of the investigative and judicial process to manage their expectations.

2)General review of the existing victim contact processes (with operational teams and case support), to identify any areas which could be tightened, to ensure fewer victims feel dissatisfied with the frequency, timeliness and type of communication they receive, both in relation to case progress updates, and victim queries.

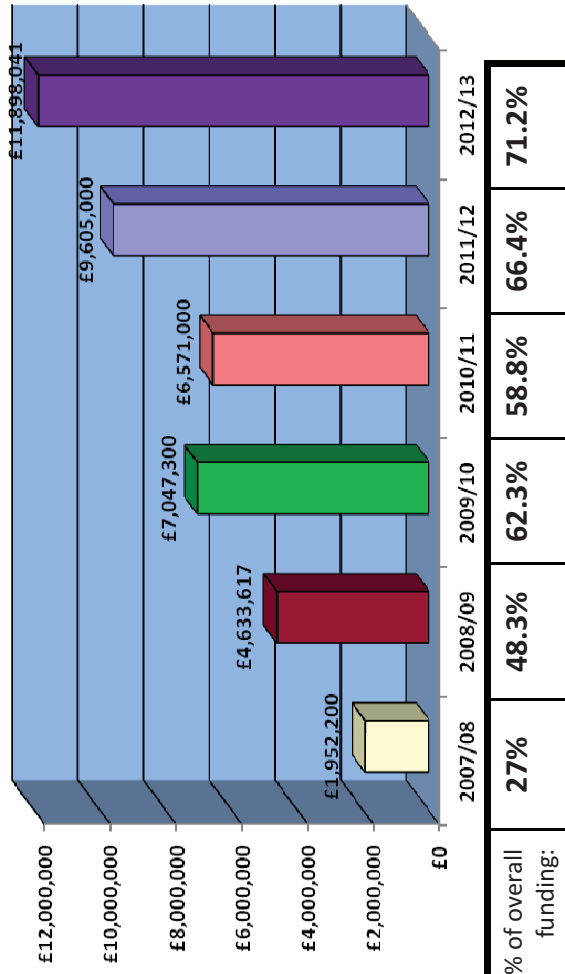
2) Explore and identify any opportunities within the victim contact process to provide further education to victims about prevalent fraud types, and associated fraud prevention advice. Once identified, to inform further actions in Q4 meeting.

KPI 5.3 £ value and % of leveraged partnership funding

Measure: 1) Monetary Value of Partnership funding with core Corporation funding

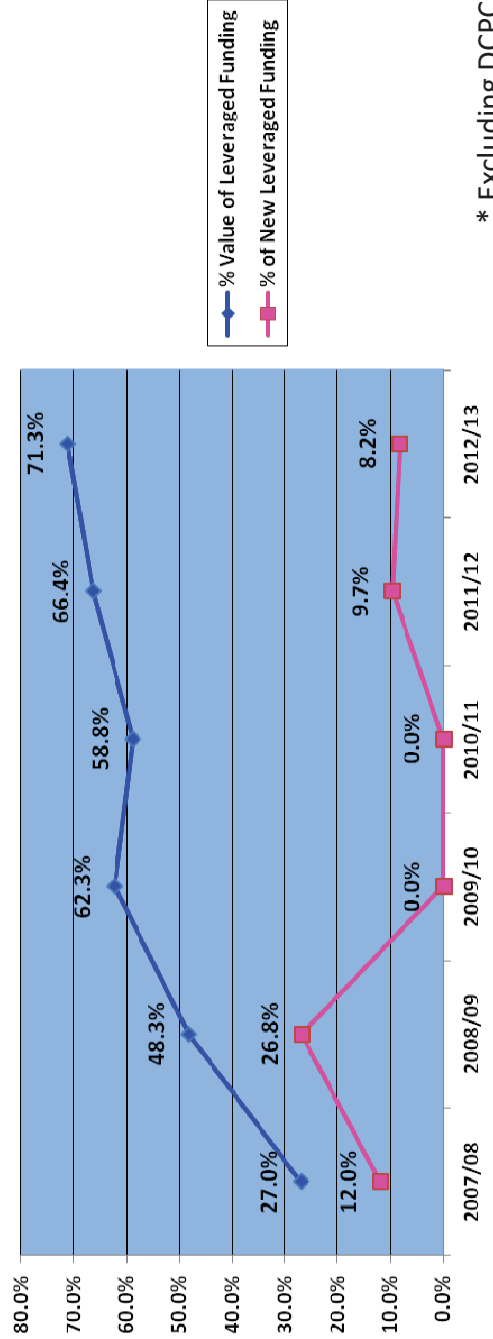
TARGET: Sustain % of leveraged partnership funding

£ Value of Leveraged Funding*



% of overall funding:	27%	48.3%	62.3%	58.8%	66.4%	71.2%
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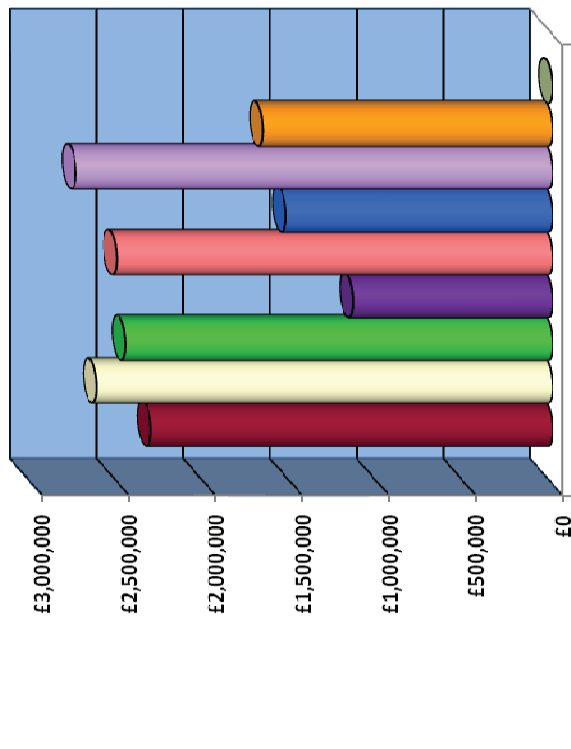
% Value of Leveraged Funding*



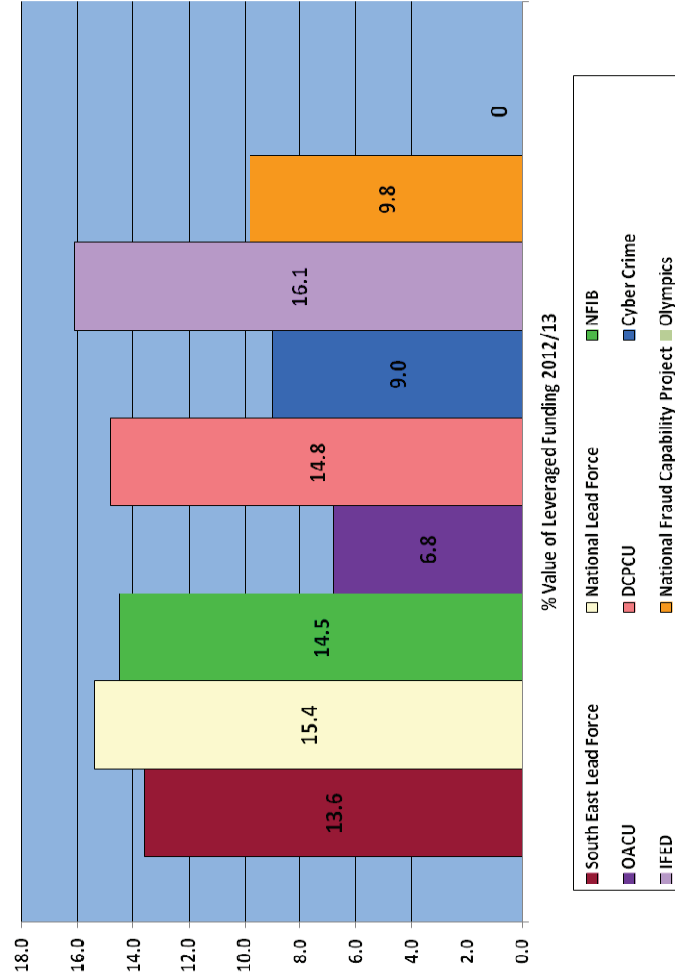
* Excluding DCPCU & Pension Costs

KPI 5.3 £ value and % of leveraged partnership funding

£ Value of Leveraged Funding – 2012/13*



% of Leveraged Funding – 2012/13*



Total Budget 2012/13 = **£23,176,000**
 £ Value of all Leveraged Funding 2012/13 = **£17,022,000**
 Total % of All Leveraged Funding 2012/13 = **73.4%**
 (Total % of All Leveraged Funding 2011/12 = **69.1%**)
 % of Sustained Leveraged Funding 2012/13 = 66.2%
 % of New Leveraged Funding 2012/13 = 7.2%

* Including Pension Costs



Appendix

APPENDIX INDEX	
Appendix A	ECD Operational Data
Appendix B	Insurance Fraud Enforcement Dept Performance Indicators
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Appendix D	Overseas Anti Corruption Unit Performance Monitoring Framework
Appendix E	Partnership Investigations
Appendix F	NFIB Crime Disseminations

Appendix A - ECD Operational Data

	QUARTER 1	QUARTER 2	QUARTER 3
Number of Victims that were vulnerable	101	180	214
Total number of suspects identified	2828	3201	2725
Total number of suspects arrested 0-6 months ago – currently on bail	671	803	617
Total number of suspects arrested 6 - 12 months ago – currently on bail	387	330	336
Total number of suspects arrested 12+ months ago – currently on bail	319	394	358
Total number of suspects arrested & on police bail	1367	1528	1405
Suspects on bail - subject of a pre-charge advice file submitted to CPS/CFG?	304	299	279
Total number of suspects, "NOT ARRESTED", but interviewed under caution. 0-6 months ago	186	217	226
Total number of suspects, "NOT ARRESTED", but interviewed under caution. 6-12 months ago	92	72	82
Total number of suspects, "NOT ARRESTED", but interviewed under caution. 12+ months ago	175	162	108
Total number of suspects interviewed but not arrested	445	459	398
Of the suspects interviewed under caution, number that were subject of a pre-charge advice file submitted to CPS/CFG?	107	130	108

Appendix A - ECD Operational Data

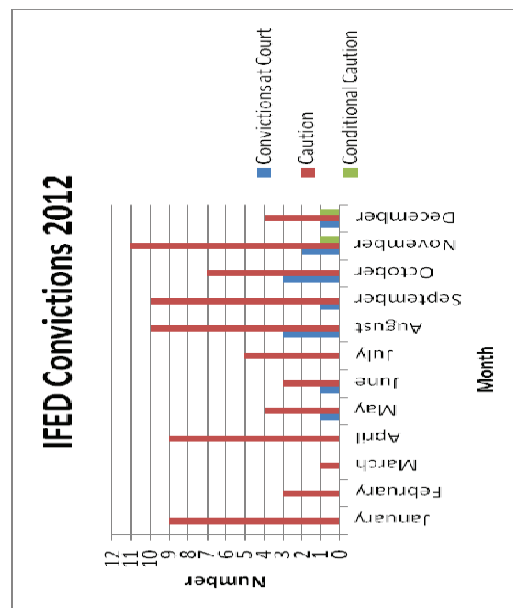
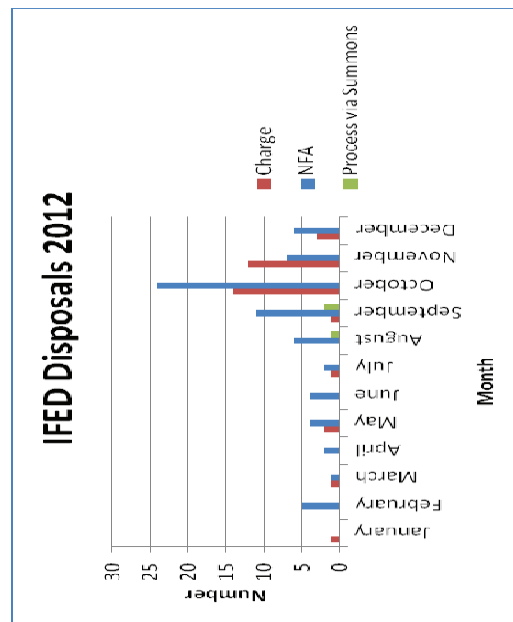
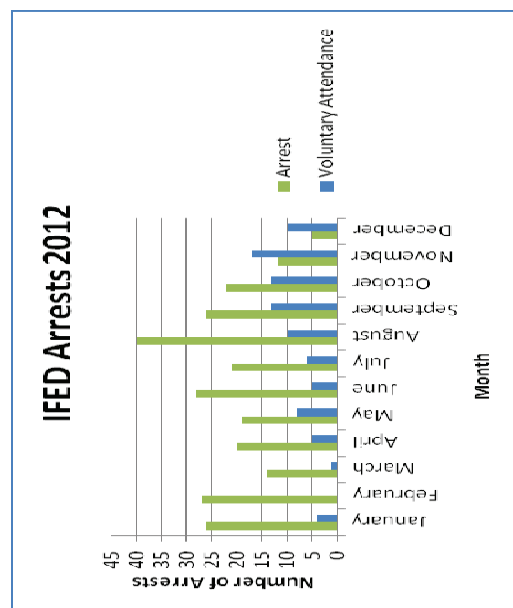
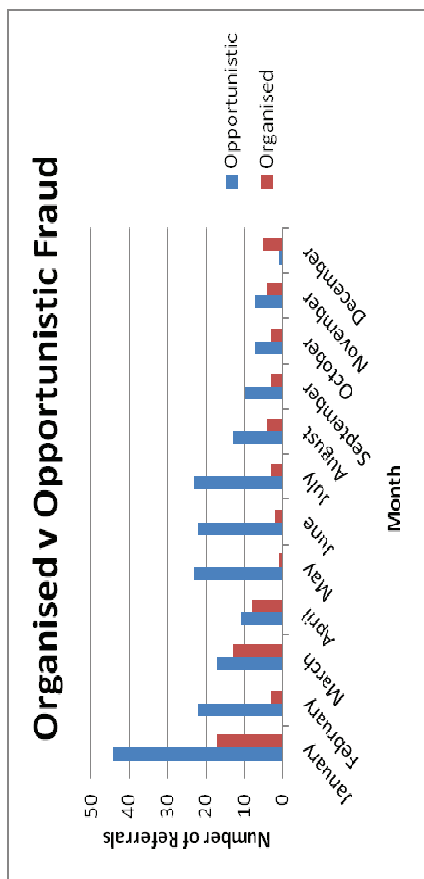
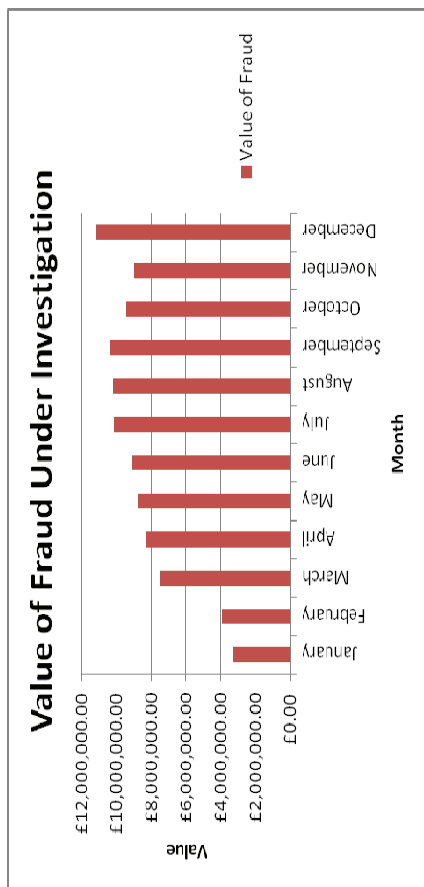
	QUARTER 1	QUARTER 2	QUARTER 3
Total number of arrests made this month	174	213	138
Total number of suspects, "NOT ARRESTED", but interviewed under caution this month	69	59	97
Number of premises searches conducted – Submission of intelligence report to FIB this month	161	151	127
Number of victim personal statements taken this	55	34	26
Financial Reporting Orders applied for	1	4	2
Financial Reporting Orders granted	2	7	1
SCPO's applied for	1	0	1
SCPO's granted	0	1	1
Case Sentencing (cases sentenced at court)	14	17	8
External presentations conducted	49	24	30
Internal presentations conducted	3	1	0

TOTAL NUMBER OF ARRESTS	260
TOTAL NUMBER OF VOLUNTARY ATTENDANCES	92
TOTAL NUMBER OF INDIVIDUALS CURRENTLY BAILED TO APPEAR	105
TOTAL NUMBER OF CONVICTIONS AT COURT	12
TOTAL NUMBER OF CAUTIONS	76
TOTAL VALUE OF FRAUD UNDER INVESTIGATION	£11,136,834.75
CURRENT NUMBER OF INSURERS REFERRING CASES	49

IFED Referrals by product type

Product Type	Accepted	Rejected	Scoping	Under Review	Grand Total
Personal - Motor	140	113*	5	258	140
Personal - Property	48	30	1	79	48
Commercial - Motor	21	21		42	21
Personal - Travel	13	7		20	13
Personal - Pet & Bloodstock	9	6		15	9
Commercial - Other Liability	4	6		10	4
Personal - Creditor	6	1	1	8	6
Commercial - Property	4	4		8	4
Personal - Personal Accident Sickness	5	2		7	5
Commercial - Employers Liability	5	1		6	5
Life	4	1		5	4
Not IFED Related		3		3	
Commercial - Contractors Plant	1	2		3	1
Personal - Other	3			3	3
Commercial - Private Medical Insurance	2	1		3	2
Commercial - Public & Products Liability	267	198	7	472	267
Grand Total	140	113*	5	258	140

APPENDIX B - Insurance Fraud Enforcement Dept - Performance Indicators



Total Arrests	118
Total Savings to Industry	£10.7 million
Total Industry Referrals	65
Total Police & Non-financial institutions referrals	41
Referral acceptance rate	79%

Appendix D - Overseas Anti- Corruption Unit – Performance Monitoring Framework

1) Overview – Quarter 3 (key achievements and recommendations)

This quarter the unit continued to focus on ongoing trial issues with four cases in the courts system and two that went to trial, Op Ballast and Op Aristo. The former resulted in a hung jury but two had already pleaded and will be sentenced in mid-November, the latter is ongoing with one main suspect already pleaded.

The OACU caseload as at 30/09/2012 stood at 21 investigations at various stages of development.

Of these:

- 12 are OACU led cases (combination of cases that require police action only or cases declined by the SFO and a further 6 awaiting vetting decisions or in the early stages of development).
- 2 are joint investigations with the SFO as lead agency,
- 1 is a CoLP supported investigation by the SFO.

OACU have £4.75 million under restraint, £17.25 million identified for restraint and £41k cash seized.

Since inception, OACU have now investigated over 125 cases, interviewed 75+ individuals under caution and charged 23 individuals and one corporate entity.

Two officers travelled to Liberia at the invitation of the FCO and engaged with senior members of the Liberian government and Liberian Anticorruption Commission to seek assistance with gathering evidence for Operation Marauder. This was supported domestically by attending a Liberian Investment trade conference in the City.

Unit members also met with the Russian authorities to discuss jurisdictional issues on a case series.

The unit also executed a warrant and an arrest in Cambridge concerning an investigation into allegations of corruption by a UK national in Turkey.

The Olympics proved to be a distracting feature of the quarter, limiting the unit's activity and causing a later log jam of cases at trial, coupled with reduced resource and recruitment issues.

Achievements-

2012 has been a year where OACU has seen the potential culmination of several high profile investigations progressing to trial.

Operation Ballast concerning the bribery of a BP employee managing commercial diving contracts in the Middle East resulted in two main suspects pleading guilty (await sentencing) and a hung jury on the remaining three but the Attorney General has authorised a retrial set for 2013.

Operation Aristo investigated the dealings of two Dutch nationals who allegedly (still at trial) influenced UN Global Fund procurement contracts for the Democratic Republic of Congo to favour a Danish Pharmaceutical company. The pharmaceutical company have already been successfully prosecuted by the Danish authorities using OACU evidence.

Operation Apple originated from a referral from the European Bank of Reconstruction and Development (EBRD) regarding an employee engaged with the provision of loans who allegedly received kickbacks from an intermediary in the US who is also being prosecuted by the FBI on OACU evidence. Trial now put back to 2013 at the Old Bailey Central Criminal Court. This enquiry also developed into two further investigations Op Salers (money laundering by Russian nationals) and Op Supermassive, the paying of bribes to a Russian national. The former is in jurisdictional negotiation with the Russian authorities and the latter awaits the A.G.'s permission to charge a US and Russian national with making and receiving corrupt payments, respectively.

Probably most satisfying was the Attorney Generals agreement to charge five individuals on Operation Cent – the investigation into the fraudulent and corrupt sale of substance detector devices to overseas jurisdictions including South Africa, Mexico, Thailand and Kenya, amongst others. The Thai and Mexican authorities are now also supporting bribery investigations in country and assisting via formal Letters of Request (LOR's). This enquiry initiated with an Avon & Somerset case involving similar sales in Iraq resulting in one suspect being charged. The four trials are due to run consecutively in early 2013 and expected to attract intense media interest particularly from BBC's Newsnight.

Achievements (cont)

Additionally, on Op Marauder alleging bribery by UK nationals in Liberia, OACU have been at the forefront of negotiations alongside the Foreign and Commonwealth Office with the Liberian authorities to support our requests for evidence gathering. Despite promoting a strong anti-corruption mandate it is clear that internal politics and capacity/capability issues are seriously hampering their good intention. Consideration was being given by the FCO to raising the case when President Ellen Sirleaf attended the UK and met with the Prime Minister.

In support of this drive OACU officers also attended a trade conference in the City of London, supported by the FCO, seeking to attract investment in Liberia. OACU ran a stand alongside the National Fraud Academy promoting anti-corruption training and guidance.

Despite a determined effort by OACU to feed in intelligence to the ICIC (14 reports in Q3), the unit have still only receipted a relatively small number of SARs (4 in Q3 and 18 in 2012 Q1-Q3). Whilst the unit have sufficient cases to engage on (21) we are still adopting more cases from other sources of intelligence.

OACU are still receiving allegations of overseas corruption concerning UK nationals and companies operating in countries that don't receive DFID funding and do not feature on the 'priority list'. This causes us concern as no other agencies will pick these up if they fall below the SFO case acceptance criteria. There appears to be no appetite or resource/expertise for local forces to adopt these investigations which exposes a gaping hole in the UK anti-bribery strategy and may attract OECD interest.

2. Recommendations

Disclosure assistant;

Through the course of the year the unit have been indirectly hampered by the staging of the London Olympics. Due to national policing requirements, leave restrictions were enforced, support roles were allocated to ECD officers and whilst OACU officers were notably excused from most operational support activity, the knock-on effect was a restriction on normal activity and business progression. Most disruptive for OACU business was the capitals courts' decision to postpone trials to the post Olympics period and a moratorium on staff recruitment within CoLP during the Force's restructuring process precipitated by Government cuts to policing.

These factors all combined post-Olympics to create a situation where the unit potentially has four separate prosecutions at trial running concurrently and the resultant pressure on investigators to support the strict disclosure regime has proved exceptionally difficult to manage. The disclosure requirements are particularly testing for overseas corruption investigations due to the defence requirements for us to obtain relevant but unused material from foreign and diplomatic venues. Notably both the UN and the EBRD have to agree material and action specific waivers to sanction release of evidence and witnesses which has produced an administrative maelstrom.

In recognition of this impending issue OACU recruited a new administrative assistant who awaits final clearance checks. The individual was specifically selected with the potential to develop into a disclosure specialist to support case officers and reduce some of the bureaucratic burden. It is recommended that this individual- a trained paralegal, is specially trained to support this role and her role profile reviewed at an agreed period to assess her capability and remuneration.

Capacity building;

Recommendations (cont)

Following our engagement with the Liberian authorities and the recognition that part of the problem in obtaining evidence from developing countries is their capability and capacity to gather evidential material, OACU are assisting the National Fraud Academy to provide training for such jurisdictions via a link-up with the Stabilisation Unit. Trial and investigative commitments allowing, OACU would recommend that DFID seek to identify other potential opportunities for the unit's expertise to be employed in a similar role, over and above the current domestic training and awareness commitment. We recognise that without that overseas capability, many of our investigations, particularly under pre-Bribery Act legislation may prove impossible to take to prosecution without reliable evidence from the foreign jurisdiction.

Regarding the incoming intelligence situation, OACU are developing sources from whistleblowers support agencies (PCAW) and overseas law enforcement. It is apparent that the return from the ICIC development is not meeting expectation and it is recommended that efforts are made to enhance this or seek additional/alternative sources to maintain intelligence throughput and dissemination whilst ensuring cases of bribery are being exposed.

3. Objectives/Milestones

Target achievement (against Q3 proposed activity)

A) Actively seeking to address the ongoing intelligence gaps by promoting better coordination of intelligence sources and linking into associated national bodies through establishment of International Corruption Intelligence Cell.

OACU have initiated the intelligence flow to ICIC submitting a number (see data table) of intell logs for action and drafting an accompanying tasking document to identify requirements and constraints. However there still appears to be a dislocation of understanding as to roles and expectations that will need further discussion.

B) Maintain and develop liaison with international law enforcement counterparts with a view to more joint proactive investigations.

OACU continue to support and develop the International Foreign Bribery Task Force (IFBT) initiative with the US, Australia and Canada, drafting the MOU for collating versions and initiating the contacts spreadsheet. At European level OACU have bid for EU funding to launch a European Cross Border Bribery Task Force to mirror the larger international group and await results. The initiative will be developed even if funding is not allocated but with obvious constraints. The unit currently engages in two Eurojust Joint Investigative Team (JIT) arrangements. Two officers liaised with the Liberian National Police and Anticorruption Commission in Monrovia to pursue the joint Op Marauder enquiry.

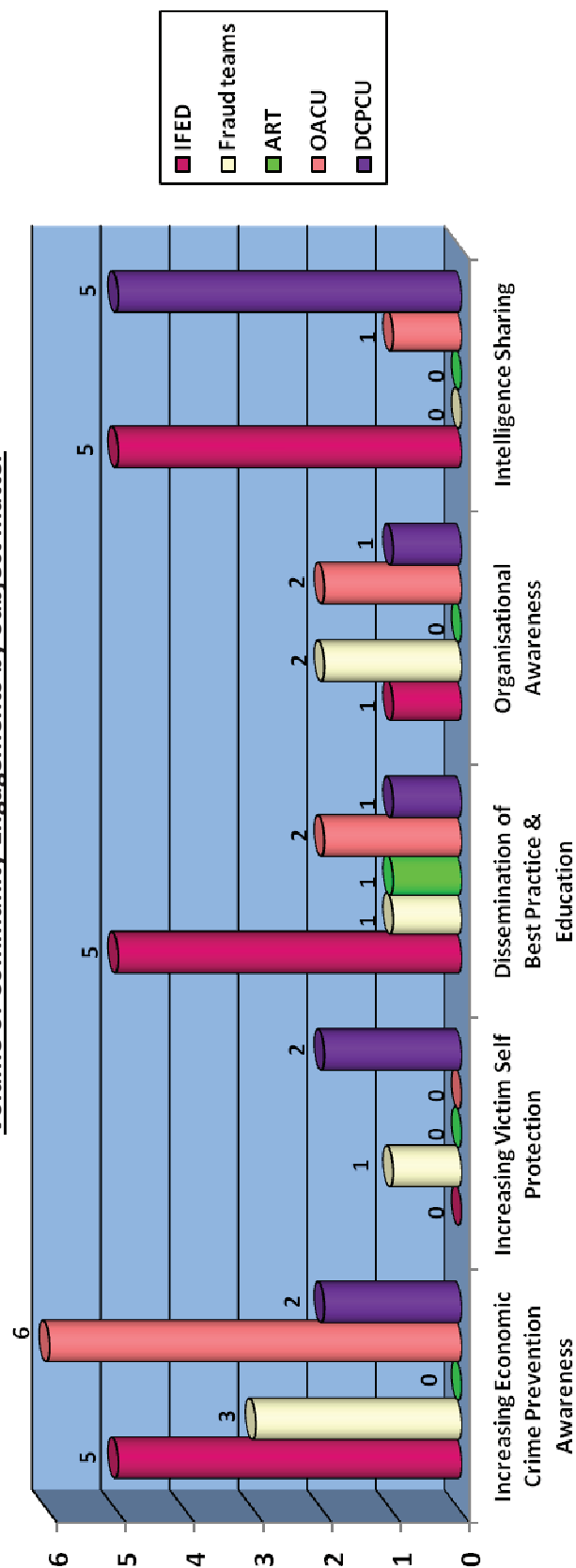
C) Continue to seek opportunities to promote DFID strategy and raise OACU's profile and proactively attract referrals from SME's by follow ups on presentations.

There has been little opportunity to pursue this objective over the summer months due to the Olympics activity distracting the business community and a 'post Bribery Act' regrouping. One notable follow up involved a Liberian Investment trade conference at the Drapers Hall where both OACU officers and the National Fraud Academy attended with a stand and promoted both anticorruption training and the practical application of the UK Bribery Act.

<u>Milestones/Objectives (cont)</u> d) Seek further proactive covert opportunities using confidential sources encouraged to report via our confidential facilities by partner agencies. <i>OACU have engaged with Public Concern at Work (PCAW) to assist them in encouraging commercial whistleblowers to report overseas bribery issues. CoLP have provided intelligence assessment and dissemination training to them and plan to include their details on forthcoming promotional material.</i> E) Progress and develop the short-term mutual exchange programme with the U.S. FBI ICC and FCPA, RCMP and AFP ‘sister’ units and drive the European and International Foreign Bribery Task Force developments. <i>See b above –all part of IFBT initiative, initial joint working on high profile Australian investigation should develop into active secondment arrangement.</i> F) Explore and exploit asset seizure, confiscation, other POCA opportunities and civil recovery to optimise fund repatriation. <i>OACU continued to identify opportunities for confiscation and have provisionally agreed a civil recovery against a high profile Russian suspect where a UK based prosecution is likely to transfer jurisdictions. Any new adopted cases have been considered for further opportunities.</i> G) Identify research and utilise new investigative/prosecutorial disposals for individuals and corporate entities exposed by the new Bribery Act 2010. Continuing to hone the intelligence referral protocol. <i>The initial ‘Intelligence Referral Protocol’ case- a global supplier of construction industry tools, has reported back discounting the uncorroborated claims examining the prevention procedures in place and identifying the new auditing checks they have installed. All will be kept on record for any later intelligence update and protocol will be further adjusted to accommodate learning.</i>	<u>4. Proposed Activity</u> In the coming quarter OACU intend to pursue the following activities; - a) Actively seeking to address the ongoing intelligence gaps by promoting better coordination of intelligence sources and linking into associated national bodies through establishment of International Corruption Intelligence Cell. b) Maintain and develop liaison with international law enforcement counterparts with a view to more joint proactive investigations. c) Continue to seek opportunities to promote DFID strategy and raise OACU’s profile and proactively attract referrals from SME’s by follow ups on presentations. d) Seek further proactive covert opportunities using confidential sources encouraged to report via our confidential facilities by partner agencies. e) Progress and develop the short-term mutual exchange programme with the U.S. FBI ICC and FCPA, RCMP and AFP ‘sister’ units and drive the European Cross-border (ECBT) and International Foreign Bribery Task Force (IFBT) developments. f) Explore and exploit asset seizure, confiscation, other POCA opportunities and civil recovery to optimise fund repatriation. g) Identify research and utilise new investigative/prosecutorial disposals for individuals and corporate entities exposed by the new Bribery Act 2010. Continue to hone and finalise the intelligence referral protocol. h) Develop emerging initiatives at a strategic level- including greater involvement with OECD, GRECO etc through the EU bid initiative, exploring the Universities business course input potential, securing OACU’s position within the emerging NCA enforcement landscape and raising our internal profile within the new CoLP structure.
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Appendix E – Community Engagements

Volume of Community Engagements by Subject matter

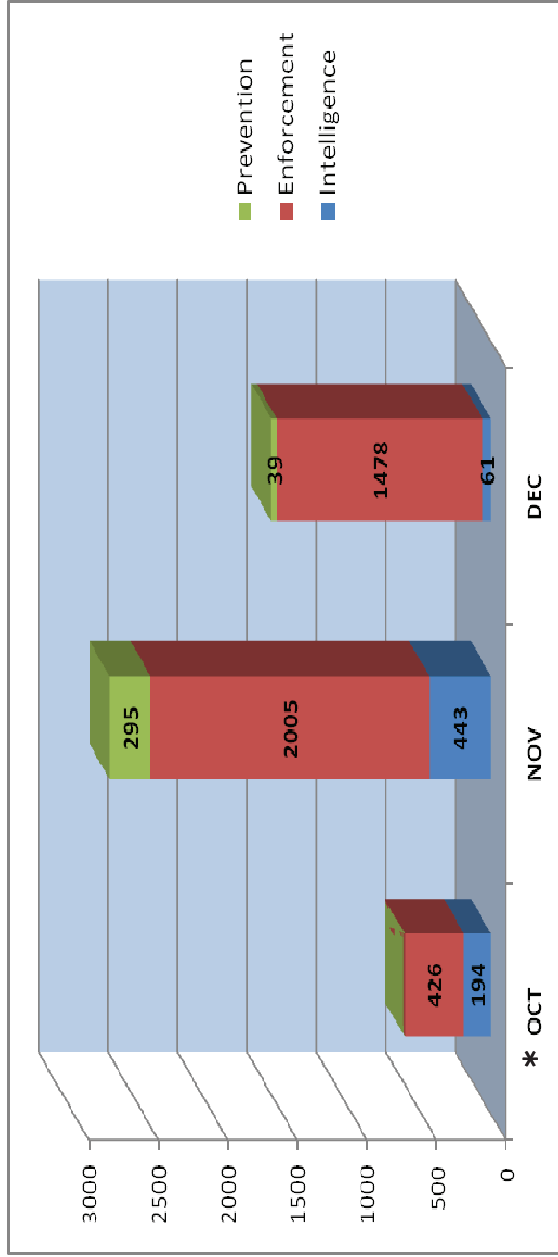


Reach of Community Engagements

Team	Number of engagements	Sectors engaged
IFED:	16	Private sector - Insurance, Police and Trade bodies. (Details held by IFED)
Fraud Teams:	6	Private sector - banking, Private sector - Financial, Public sector - local government, members of the public, Trade bodies and Police.
ART:	1	Private sector – banking
OACU:	11	Overseas Government, Overseas Company, Overseas Law Enforcement, Central government and numerous international Private sector companies

Appendix F – NFIB Crime Disseminations

Number of NFIB Crime Disseminations



Value of NFIB Crime Disseminations

	OCT	NOV	DEC
Intelligence	*£11,303,946.00	£3,510,093.00	£803,719.00
Enforcement	*£2,627,889.97	£18,609,860.70	£26,812,769.70
Prevention	*£0.00	£175,386.00	£12,298.65
TOTALS	*£13,931,835.00	£22,295,339.70	£27,628,786.65

* The data on this page was retrieved from the SharePoint NFIB crime dissemination database system which was being trialled in October by only a portion of crime reviewers within NFIB. This system was fully implemented in November. Therefore the data retrieved for the month of October and used on this page is not reflective of the total number or value of crimes disseminated in October.

Total Number of Crimes Disseminated

4491

Total Value of Crimes Disseminated

£63,855,962.32

Performance Target	Performance Targets Overview - Status at end of Q3
NFIB Target: To increase the volume of suspensions (disruptions) of technological enablers via the NFIB by 30%	Whilst the Q3 total of disruptions (323) is fewer than those achieved in Q2 (381), NFIB are still exceeding their cumulative target of 655 (achieving over 200 extra disruptions (858 in total). Requiring only a further 16 disruptions it can be safely assumed that this target will be achieved before the end of Q4.
NFIB Target: To improve the quality of fraud alerts shared with businesses and public sector organisations by 10%	NFIB survey monkey feedback which is used to examine the level of quality of fraud alerts and identify opportunities for improvement returned a lower response rate in Q3. Despite the low response to survey requests the results still yielded value in that they assisted in identifying specific aspects of the alerts could be improved in order to raise the level of quality (see recommended action – PG 7).
Ops Delivery: To disrupt at least 25% of CoLP OCGs who use fraud as a means of stealing from individuals, businesses and the public sector	The target amount of OCG disruption activity in 2012/13 is 24. The target figure was originally calculated, using the aggregate of OCGs in tiers 1 – 3 as of April 2012. Since the start of 2012/13 - 20 OCG disruptions have been recorded. This is 2 disruptions above the cumulative target number for the end of Q2 (12).
ART Target: To increase the volume of confiscation orders by 10% and cash seizures to 50.	The Asset Recovery Team are currently performing very well in relation to the volume target for Confiscation Orders, as they are 12 orders over the cumulative target for the end of Q3, and have already exceeded the overall target milestone for the end of 2012/13 by four confiscations. In relation to cash seizures, the ART, are currently exceeding the target for the end of Q3 by 2, having completed 40 seizures to date. Given that the current average rate of cash seizures is 13 per quarter for 2012/13 it can be assumed that ART will also achieve the target required a further 10 cash seizures to be achieved for Q4.
Academy Target: To ensure that 85% or more people attending the Fraud Academy courses are very satisfied overall with the quality and content of courses attended	The cumulative figure (Q1,Q2 & Q3 combined) of delegates that have found the CONTENT and QUALITY of the NLF courses to be either Excellent, Good or Very Good is 95%, which exceeds the target of 85% or above. The cumulative figure (Q1,Q2 & Q3 combined) for the number of feedback questionnaires completed by course delegates is currently 82% (3 % below target), although this is due to a number of forms not received in time from a particular course held in December and were therefore not included in Decembers data return. Once these forms have been received it is expected that the % of returns will exceed the target.
Ops Delivery / Academy / NFIB: To achieve an increase in overall satisfaction level with victims	Wave 1 Survey (March 2012)– ‘Completely, very & fairly satisfied’ = 89% (95 respondents) Wave 2 Survey (Sept 2012) – ‘Completely, very & fairly satisfied’ = 89% (124 respondents) [SPA survey data to be clarified in relation to overall satisfaction responses]
Ops Delivery / Academy / NFIB: To achieve an increase in overall satisfaction level with stakeholders	Wave 1 Survey (March 2012) – ‘Completely, very & fairly satisfied’ = 95% (35 / 37 respondents) Year to Date (Wave 1 & 2 combined) – ‘Completely, very & fairly satisfied’ = 95% (73 / 77 respondents). Shows NLF stakeholders perceptions have remained consistently high. New recommendations devised have been included for Q3 that will contribute towards improving certain aspects of NFIB/FA service delivery to stakeholders.

Agenda Item 8

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Agenda Item 9

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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