



Economic Crime Board of the Police Committee

Date: THURSDAY, 13 NOVEMBER 2014
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Simon Duckworth (Chairman)
Nicholas Bensted-Smith
Mark Boleat
Lucy Frew
Helen Marshall
Deputy Richard Regan OBE

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

N.B: Part of this meeting could be subject to audio video recording

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To confirm the minutes of the meeting held on 5 September 2014.
For Decision
(Pages 1 - 4)
4. **ECONOMIC CRIME UPDATE - NATIONAL FRAUD CAPABILITY PROGRAMME**
Report of the Commissioner of Police.
For Information
(Pages 5 - 8)
5. **NATIONAL LEAD FORCE: SECOND QUARTER PERFORMANCE REPORT**
Report of the Commissioner of Police.
For Information
(Pages 9 - 18)
6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
8. **EXCLUSION OF THE PUBLIC**
MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of the Schedule 12A of the Local Government Act.

Part 2 - Non-Public Agenda

9. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 5 September 2014.
For Decision
(Pages 19 - 20)
10. **ECONOMIC CRIME ACADEMY**
Report of the Commissioner of Police.
For Information
(Pages 21 - 26)
11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
12. **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, 5 September 2014

Minutes of the meeting of the Economic Crime Board of the Police Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 5 September 2014 at 1.45 pm

Present

Members:

Simon Duckworth (Chairman)
Nicholas Bensted-Smith
Lucy Frew
Helen Marshall
Deputy Richard Regan OBE

Officers:

Katie Odling	Town Clerk's Department
Alex Orme	Town Clerk's Department

City of London Police:

Adrian Leppard	Commissioner
Stephen Head	Commander, Economic Crime
Hayley Williams	Chief of Staff
Steve Telling	Chamberlain's Department

1. APOLOGIES

There were no apologies for absence.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations of interest.

3. MINUTES

The Minutes of the meetings held on 28 February 2014 and 22 May 2014 were approved.

4. NATIONAL LEAD FORCE: FIRST QUARTER PERFORMANCE REPORT

The Board received a report of the Commissioner of Police which summarised the performance delivered by the City of London Police in its capacity as National Lead Force for Fraud as delivered through the Economic Crime Directorate.

National Attrition – The Board discussed the increase in disruptions to criminal activity from 3,690 in Quarter 1 last year to 49, 548 in Quarter 1 this

year. The Board noted that the NFIB had allowed the CoLP to identify fraud networks on a national level and this would be progressed.

The Commissioner of Police advised that through the Action Fraud website he would look at publicising the way information was used in order to create awareness to the public.

KPI 3.3: To reduce intent and capability of the most serious Organised Crime Groups perpetrating fraud: The Board were informed that this indicator continued to be closely monitored, however, there were no indications that the targets would not be met. The Chairman requested close monitoring to ensure the ECD were following the correct reporting cycles.

RESOLVED – That the report be received.

5. **ECONOMIC CRIME UPDATE - NATIONAL FRAUD CAPABILITY PROGRAMME**

The Board received a report of the Commissioner of Police which provided an update in relation to the National Fraud Capability Programme.

National Direction of Travel: The Commissioner advised that the Town Clerk was keen to discuss with Quiller the position of the City of London Police both nationally and locally and a funding plan was currently been drawn up.

The phraseology on page Page 31 would be reconsidered; the Board considered the use of the term 'gripe' ought to be clarified through alternative wording.

RESOLVED – That the report be received,

6. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There were no items of urgent business.

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions.

8. **EXCLUSION OF THE PUBLIC**

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

9. **NON-PUBLIC MINUTES**

The Non-Public minutes of the meetings held on 28 February 2014 and 22 May 2014 were approved.

10. **FRAUD TRAINING ACADEMY**

The Board received a report of the Commissioner of Police regarding the Fraud Training Academy and Members were invited to make any observations and comments.

11. **ACTION FRAUD SERVICE TRANSFER FROM THE NATIONAL FRAUD AUTHORITY TO THE CITY OF LONDON POLICE**

The Board received a report of the Commissioner of Police regarding the Action Fraud Service Transfer from the National Fraud Authority to the City of London Police.

RESOLVED – That the report be received.

12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions.

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

There were no items of urgent business.

The meeting ended at 2.45 pm

Chairman

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Officer:

Katie

Odling

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Committee(s): Economic Crime Board	Date(s): 13 th November 2014
Subject: Economic Crime Update – National Fraud Capability Programme	Public
Report of: Commissioner of Police Pol 71-14	For Information
<p><u>Summary</u></p> <p>The National Capability Programme continues to make steady progress and the last reporting period has seen the inaugural meeting of the Home Office Strategic Oversight Group which has been a useful vehicle to assert influence over other Forces nationally.</p> <p>City of London Police (CoLP) is leading on the production of the National Fraud Strategy for the police services of England and Wales, consulting with our police colleagues and partners including the National Crime Agency (NCA) and private sector representatives.</p> <p>Increased effort is being put into the development fraud prevention initiatives. At the strategic level, CoLP has sought to raise the profile of fraud (and cyber-enabled fraud in particular) through the national media and speaking engagements. At the operational level CoLP has put in place a pilot crime prevention hub and linked into a network of crime prevention leads at local force and local authority level.</p> <p>CoLP continue to improve the service provided by Action Fraud since taking responsibility for it in April and complaints have continued to fall during this reporting period following re-design of the public interface. On the theme of support to victims of Fraud we continue to work with Victim Support UK and the Metropolitan Police Service (MPS), to put in place and pilot a Victim Care Unit for the vulnerable victims of economic crime.</p> <p>Wider engagement continues and there are plans for Commander Head to attend the Association of Police and Crime Commissioner’s Conference to deliver a workshop in the next reporting period.</p> <p>Recommendations</p> <p>It is recommended that members receive this report and note its contents.</p>	

Main Report

Background

1. The National Capability programme team was created in April 2012 and continues to be led by Commander Stephen Head, National Police Coordinator for Economic Crime. Having largely put our City Of London Police capabilities in place the focus is now on our national role of leading improvement in the police service response to fraud at the national, regional and local levels.

Current Position

2. The last quarter has seen us gain significant traction as the National Lead Force exemplified by the first meeting of the Strategic Oversight Group at which we were able to demonstrate to Home Office officials the value added at the national level. This meeting was attended by the Commissioner and the Chairman of the Economic Crime Board, Simon Duckworth. Our efforts and contribution to this area were recognised and it was agreed that we need to further publicise our successes, including in improvements to Action Fraud.
3. We have also used the Strategic Oversight Group to exert some influence on local forces and have seen improvement in those forces identified as needing additional support from us. Whilst the attrition measures, to which we refer in our performance report, are somewhat crude (we are working on this) they do at least give an indication of trend, relative position and order of scale. As such, they are useful in getting the engagement of Chief Officers and their Police and Crime Commissioners, and Commander Head has been able to use this to start shaping local priorities and commitment.
4. We are leading on the production of the National Fraud Strategy for the police services of England and Wales, consulting with our police colleagues and partners including the National Crime Agency (NCA) and private sector representatives. Whilst this strategy cannot be too overtly City of London centric it does offer us the opportunity to explain and put on record the capabilities we provide to national policing. Key amongst these is the role of Action Fraud and the National Fraud Intelligence Bureau (NFIB) as the national centre for fraud and cyber crime reporting and intelligence. We continue to take every opportunity to strengthen this central role and are looking, for example, to provide this functionality to support the areas of identity crime, and bribery and corruption.
5. Regardless of how effective the police service becomes in tackling fraud it will never be able to simply 'enforce' its way out of the issue. To that end, we are putting increased effort into crime prevention (and this will feature heavily in the national strategy). By its nature, fraud tends, in many cases, to require some act of participation by its victims whether in compromising their identity or transferring funds. Our prevention work is therefore centred on raising

awareness in order to allow potential victims to avoid the behaviour that places them at risk. At the strategic level, we have sought to raise the profile of fraud (and cyber-enabled fraud in particular) through the national media and speaking engagements. At the operational level we have put in place a pilot crime prevention hub and linked into a network of crime prevention leads at local force and local authority level. We have used this to provide national support to local prevention needs with a series of road shows and conversely will be using the local assets in support of our national Christmas fraud prevention campaign. Interestingly, whilst there seems an abundance of policy and strategy in this area, consultation with the Home office and other partners in this revealed a need for leadership and coordination of its delivery for which they now look to the City of London Police. We will take up the challenge, building a coalition of the willing as our first step.

6. We continue to improve the service provided by Action Fraud since taking responsibility for it in April. Complaints about Action Fraud itself have reduced further since our last report following redesign of the public interface in conjunction with Victim Support and other partners and improvement to our communication with victims. Action Fraud continues to receive correspondence (approximately 200 items per week) from victims seeking further help with their case following referral to a police force and Action Fraud puts considerable effort into this aspect of its victim care service. The Strategic Oversight Board was clear that we should be presenting this as a positive, an indicator of value being added by Action Fraud. On the theme of support to victims we continue to work with Victim Support UK and the Metropolitan Police Service (MPS), to put in place and pilot a Victim Care Unit for the vulnerable victims of economic crime. Action Fraud has also now developed the 'front end' of bulk reporting to meet the concerns of business (working with the British Retail Consortium in particular) and we are now ensuring that NFIB can handle the increase in-flow before going live.
7. Commander Head continues to engage with Chief Officers and Police and Crime Commissioners and will be running a workshop at the national Association of Police and Crime Commissioners (APCC) Conference, addressing the issues of cyber crime and fraud. We have found that such engagement is now becoming much more of a meaningful dialogue, a further sign of the increased acceptance of our national role. It was a pleasure to write to the Commissioner of the Metropolitan Police Service, congratulating him on Operation FALCON and the increase in fraud capability this represented and confirming our intent to work in collaboration with them. We have further shaped the work of the NCA threat group in which we lead and are looking to restructure the Economic Crime Portfolio working groups to ensure they have value that can ultimately be felt at the local level.

Conclusion

8. This is an exciting period as we are increasingly able to use our leadership position to influence and improve the national police response to fraud. Our role in developing the fraud strategy and in putting in place and leading the economic crime prevention effort reinforces that position. We need to ensure

that others are aware of the value we are bringing to the national counter-fraud scene and will continue to work on this with the support of the City of London Corporation.

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National Capability Programme

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Agenda Item 5

Committee(s): Police: Economic Crime Board	Date(s): 13 th November 2014
Subject: National Lead Force: Second Quarter Performance Report	Public
Report of: Commissioner of Police Pol 69-14	For Information
Summary	
<p>This is the Quarter two 2014-15 Performance Report to your Economic Crime Board summarising the performance delivered by the City of London Police in its capacity as National Lead Force for Fraud as delivered through the Economic Crime Directorate.</p> <p>The report also provides your Economic Crime Board with a performance update in respect of:</p> <ul style="list-style-type: none">• Action Fraud Victim Complaints.• Value for Money position for the quarter• Overall Attrition from Action Fraud Reporting through to outcomes for the victims.	
Recommendation	
<p>It is recommended that your Board receives this report and notes its contents.</p>	

PERFORMANCE REPORT

This report presents performance through a master dashboard (Table 1 below) and 4 subsidiary tables selected as being of particular and current interest to the Board.

Key:

	Performance is satisfactory and gives no cause for concern.
	Performance is satisfactory but with minor cause for concern. It is being monitored and action is being taken where required.
	Performance is unsatisfactory. Action Plans are in place.
↑	There is an improving trend (ie an improvement in performance rating or improvement within the performance rating)
↓	There is a declining trend (ie a decline in performance rating or decline within the performance rating)
→	Performance is neither improving nor declining

Table 1 - OVERVIEW	
ECD Performance (see Table 2) →	National Attrition (see Table 3) ↑
Action Fraud Complaints (see Table 4) ↑	Value for Money (see Table 5)

Table 1 Commentary: This table provides the overall performance overview in 4 areas each explored more fully in the tables below.

- **ECD Performance** Indicates how well ECD is performing against its 5 KPAs. ECD continues to deliver against the 5 KPAs to a satisfactory level.
- **Action Fraud Complaints** Indicates how well Action Fraud is performing based on the number and nature of complaints. The level of Action Fraud complaints remains low and has reduced further but continues to be subject of an action plan.
- **National Attrition** Indicates how well CoLP is performing in its broader role as national lead force for fraud, based upon the ability to convert reports to Action Fraud into successful outcomes achieved by local police forces. Whilst we are seeing national police forces improving their performance under CoLP NLF leadership it remains at an unsatisfactory level.
- **Value for Money** Indicates how well ECD is performing as measured by return on investment and customer satisfaction. We continue to be judged as providing satisfactory value for money.

ECD PERFORMANCE

Table 2 - ECD PERFORMANCE	
KPA 1 Preventing and Reducing Harm ↓	KPA 2 Enriched Threat Assessment and Intelligence Picture →
KPA 3 Enforcing and Disrupting Crime ↓	KPA 4 Education and Awareness →
KPA 5 Satisfaction Levels	

Table 2 Commentary: ECD is generally performing well against the 5 KPAs. KPA 1 is trending down for the 2nd consecutive quarter due to a reduction in the volume of crime awareness products distributed by ECD (892 in Q2 13/14 compared to 819 in Q2 14/15). This is largely due to a reduction in capacity due to analysts leaving NFIB for jobs in the private sector. This quantitative decline has been fully compensated for by a significant qualitative improvement through our crime prevention initiatives (more detail in NLF Report). Whilst KPA 3 performance is fully satisfactory with regards to enforcement and disruption there has been a large decline in assets recovered from the unusually high £5.8 million in Q2 13/14 to £0.5m Q2 14/15. The unrepresentative figure for last year notwithstanding we are putting in place action to seek more opportunities to chase assets. KPA 5 is awaiting further financial data to enable calculation of the ROI so we are unable to provide a direction of travel for this reporting period, however given the consistently strong performance of the KPIs, this KPA remains Green.

Detail of individual KPIs is at Appendix 1 should the Board wish to refer to it.

Action Plan: Continuous monitoring and ongoing improvement.

NATIONAL ATTRITION

Table 3 - NATIONAL ATTRITION	
Reporting Levels ↑	Quality of Crime Packages ↑
Disseminations to Local Forces ↑	Outcomes ↑
Disruptions ↓	

Table 3 Commentary: In addition to disseminating crime packages, NFIB will use the intelligence gathered to provide prevention messages across sectors and to

community groups, and disrupt criminal activity by having websites, bank accounts and phone accounts denied to the criminals to prevent further victimisation.

- **Disruptions** Quarter 2 has seen continued growth with 35,423 disruption suspension requests being made, an increase of almost 300% when compared to Quarter 2 2013-14 which saw only 8,906 requests being made. However in contrast to Quarter 1's return, which saw 49,548 disruptions, Quarter 2's performance is trending downwards. We expect this to be reversed in the next quarter.
- **Reporting Levels** Some 224,245 reports were ingested by Know Fraud in Quarter 2 compared to 208,787 in the same period last year. The mechanisms that will allow large corporate enterprises to "bulk report" is still being developed but is expected to be in place by November this year. We are working to ensure they ingestion of these additional reports can be handled by the system and does not lead to unacceptable loss of quality elsewhere in the process.
- **Quality of Crime Packages** In order to improve the quality of our crime packages we continue to put in place dedicated crime focus desks to provide dedicated analytical capability focused on specific threat or victim types to better develop linked series crimes and complex networks.
- **Disseminations** There has been an increase in the number of packages disseminated to forces rising from 11,483 Quarter 2 last year to 16,625 in this quarter representing an increase of 16% on Q1's performance.
- **Outcomes** Successful outcomes following dissemination of an Action Fraud crime package to local police forces has risen from 2,375 in Quarter 2 last year to 3,839 for Quarter 2 this year.

Action Plan: A formal Action Fraud action plan is in place and being implemented:

- **Reporting levels.** We continue to work with Victim Support and other police and private sector stakeholders to make the public facing aspects of Action Fraud as 'user friendly' as possible. We are developing the technical means to enable bulk reporting by business, which we aim to launch in November 2014. We also engaged with the Home Office Science Team in upgrading the reporting tools even more, to ensure the right data is captured by the system and to make the on-line reporting tool visible and legitimate.
- **Quality of Crime Packages** The training programme for analysts continues to be rolled-out. We are still conducting analysis to better determine which aspects of the crime packages impact on the ability of a police force to

successfully investigate them, especially in support of pursuing viable lines of enquiry and solvability.

- **Outcomes** We have now held the first of the Strategic Oversight Group meetings where we, alongside Simon Duckworth, explained to Home Office Officials and others how the City and the City of London Police are contributing to the national police response to fraud. This was well accepted, of more interest however, was discussion about how that group could help local forces collectively and individually, better tackle fraud and cyber enabled crime. We are acknowledged as having a leading part in leading and guiding policing and its partners in addressing these issues. We are, addressing the performance issues identified by our analysis of attrition at local force level and have engaged with those forces who are statistical outliers to support them where we can.

Table 4 - ACTION FRAUD COMPLAINTS	
Complaints	↑

Table 4 Commentary: Commencing in August this year we carried out a further root cause analysis of complaints, including e-mails which are not classed as complaints however are members of the public asking for updates on their incidents or crimes. We are in the process of breaking this down into months and themes, and should have this work complete by the end of November. In order to further improve our service we have used the complaint information as customer feedback, and have redesigned every contact letter that we send out. We have sent these letters out to every force for comment and input as well as victim support and the Home Office. We received input from 10 forces, and victims support and have adjusted the letters accordingly.

Action Plan: On taking responsibility for Action Fraud in April we instigated a victim engagement process. The new victim letters will go live as of Monday the 29th of September, and where appropriate will include a fact sheet to help victims in the future. Complaints will be closely monitored from this date to see if there is any change in either volume or themes. A review will be carried out after a 3 months period.

Table 5 - VALUE FOR MONEY

Return on Investment

Table 5 Commentary: Using nationally accepted methodology and assumptions we have calculated the return on investment ECD represents to the public. This is expressed as a ratio representing the running costs incurred against the benefit achieved in terms of the value of crime disrupted, the loss of money prevented by criminals being unable to operate following prosecution and assets denied or removed from criminals.

In Quarter 2 2013-14 this was calculated as £46.69 benefit for every £1 spent. As mentioned earlier in the report, the ROI for Quarter 2 2014-15 is currently unavailable for comparison purposes.

Action Plan: Continuous monitoring and ongoing improvement.

SUMMARY

Overall ECD is meeting its core delivery objectives.

While National Attrition performance remains unsatisfactory, the action plan being implemented is expected to realise improved performance.

We will continue to monitor progress against these action plans and report to the Board.

KPI DETAIL

NLF Objective	Comment on Progress
KPA 1 Preventing and reducing the harm caused by economic crime	
KPI 1.1 Projected monetary value of future fraud loss saved by disrupting financial, technological and professional enablers of economic and cyber crime	The year to date position for the <u>potential</u> value of ECD disruptions at the end of Quarter 2 2014-15 has increased to £261 million from £108 million in Quarter 2 2013-14.
KPI 1.2 Raising Public sector/Private sector/not for profit sector organisation awareness of Economic and Cyber crime threats and increasing their ability to protect themselves	The year to date position for volume of ECD products disseminated to private/public and not for profit sector organisations at the end of Quarter 2 has decreased from 892 in 2013-14 to 819 in 2014-15. A loss of trained analysts to the private sector has given us capacity issues which we have not yet managed to overcome.
KPI 1.3 Increasing individual self-protection from Economic and cyber crime and reducing the risk of repeat victimisation	The volume of media coverage has increased from 140 in Quarter 1 2014-15 to 200 in Quarter 2. This figure relates to the number of programmes where ECD has been referenced on either television/radio or number of articles published on the internet or paper publications. NB The Board should note that no YTD comparison is available.
KPA 2 Enriching the national economic crime threat assessment and intelligence picture	
KPI 2.1 Impact of ECD contributions to the development of the National Intelligence Requirements	In Quarter 2 2014-15 70% of the National Intelligence Requirement Gap questions were answered as a result of ECD contributions. NB The Board should note that this is a new measure so no

	YTD comparison is available.
KPI 2.2 Identification, assessment, management and dissemination of national active offenders (lone and OCGs)	In Quarter 2 2014-15 4,150 offenders were identified by ECD and disseminated to law enforcement partners. NB The Board should note that this is a new measure so no YTD comparison is available.
KPA 3 Enforcing and disrupting economic crime at the local, regional and national levels	
KPI 3.1 The value of criminal asset denial through to recovery (end to end process)	The year to date position for the value of criminal assets recovered at the end of Quarter 2 2014-15 has decreased to £476,172 from an uncharacteristic high of £5.8 million in Quarter 2 2013-14. We are reviewing this to confirm that we are pursuing this as hard as we can be.
KPI 3.2 The £ value of future fraud disrupted by NLF enforcement cases	The year to date position for the value of future fraud disrupted by NLF enforcement cases at the end of Quarter 2 2014-15 has increased to £230 million from £141 million in 2013-14.
KPI 3.3 To reduce the intent and capability of the most serious Organised Crime Groups perpetrating fraud	The year to date position for the number of Organised Crime Groups disrupted at the end of Quarter 2 2014-15 has increased from 13 in Quarter 2 2013-14 to 15.
KPI 3.4 Quality of investigation and enhancing judicial outcomes	The year to date position for the number of offenders charged at the end of Quarter 2 2014-15 has decreased from 132 in 2013-14 to 122 in 2014-15. Despite this dip we remain on target for the year.
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 Impact and reach of training	The year to date position for the number of delegates trained by the Economic

strategy and delivery	Crime Academy at the end of Quarter 2 2014-15 has increased from 370 in 2013-14 to 442.
KPI 4.2 Impact and reach of standard setting and dissemination of best practice guidance	The year to date position for the Fraud course changes originating from operational learning at the end of Quarter 2 2014-15 has decreased from 10 in 2013-14 to 2 in 2014-15.
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 return on investment value for Quarter 1 2014-15 was an estimated £45.70. Whilst a Quarter 2 value cannot yet be determined as financial details are still be collated, the level of projected money saved by ECD provides a strong indication that the return on investment figure will be higher in this quarter.
KPI 5.2 To improve overall satisfaction of community (including victims) and partners in industry with NLF economic crime services	During Quarter 2 2014-15 92% of victims were satisfied with the Action Fraud Reporting Service compared to 88% in Quarter 1. NB The Board should note that no YTD comparison is available.

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
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