

Economic Crime Board of the Police Committee

Date: FRIDAY, 5 APRIL 2019

Time: 11.00 am

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Nicholas Bensted-Smith (Chairman)

Simon Duckworth

Douglas Barrow (Ex-Officio Member)

Deputy Keith Bottomley

Andrew Lentin (External Member)

Deputy Robert Merrett Benjamin Murphy Deputy Henry Pollard

Deputy James Thomson (Ex-Officio Member)

Enquiries: Alistair MacLellan

alistair.maclellan@cityoflondon.gov.uk

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

N.B. part of this meeting may be subject to audio-visual recording.

John Barradell Town Clerk and Chief Executive

Future meeting dates (all at 11.00am)

5 July 2019 18 October 2019

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 approve the public minutes and non-public summary of the meeting held on 21 January 2019.

For Decision (Pages 1 - 6)

4. OUTSTANDING REFERENCES

Joint Report of the Commissioner and Town Clerk.

For Information (Pages 7 - 12)

5. NATIONAL LEAD FORCE PERFORMANCE FOR THE 11 MONTHS TO 28 FEB 2019

Report of the Commissioner.

For Information (Pages 13 - 32)

- 6. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD
- 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 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.

For Decision

Part 2 - Non-Public Agenda

9. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 21 January 2019.

For Decision (Pages 33 - 36)

10. NON-PUBLIC OUTSTANDING REFERENCES

Joint Report of the Commissioner and Town Clerk.

For Information (Pages 37 - 40)

11. ECONOMIC CRIME ACADEMY UPDATE

Report of the Commissioner.

For Information (Pages 41 - 46)

12. **ECONOMIC CRIME VICTIM CARE UNIT PERFORMANCE TO FEBRUARY 2019** Report of the Commissioner.

For Information (Pages 47 - 48)

13. **ECONOMIC CRIME DIRECTORATE STAFF NUMBERS AT 28 FEBRUARY 2019** Report of the Commissioner.

For Information (Pages 49 - 52)

- 14. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD
- 15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED



ECONOMIC CRIME BOARD OF THE POLICE COMMITTEE Monday, 21 January 2019

Minutes of the meeting of the Economic Crime Board of the Police Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 21 January 2019 at 11.00 am

Present

Members:

Nicholas Bensted-Smith (Chairman) Simon Duckworth Deputy Keith Bottomley Deputy Robert Merrett Benjamin Murphy Deputy Henry Pollard

City of London Police Authority:

Simon Latham - Deputy Chief Executive of the City of London

Police Authority

Oliver Bolton - Deputy Head of the City of London Police Authority

Team

Alistair MacLellan - Town Clerk's Department

City of London Police Force

lan Dyson - Commissioner of Police

Neil Taylor
 Head of Strategic Delivery Unit (Economic Crime)
 Perry Stokes
 A/Detective Chief Superintendent (Economic

Crime)

1. APOLOGIES

Apologies were received from Doug Barrow, Andrew Lentin and Deputy James Thomson.

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

There were no declarations.

3. MINUTES

RESOLVED, that the public minutes and non-public summary of the meeting held on 28 November 2018 be approved as a correct record.

Matters Arising

National Lead Performance

In response to a query from a Member, the Commissioner noted that a central government Economic Crime Strategy Board had been established that was co-chaired by the Chancellor of the Exchequer and the Home Secretary and consisted of senior Government department representatives and Chief Executives of major banks. Below the Strategy Board was the Economic Crime

Delivery Board on which the Commander (Economic Crime) sat. A further report on National Lead Force activity would be submitted to Members in due course.

4. OUTSTANDING REFERENCES

Members considered a report of the Town Clerk regarding outstanding references from previous meetings and the following points were made.

1/2017/P - Fraudulent Cryptocurrencies

 The Commissioner noted that this reference would be closed prior to April 2019.

2/2017/P - Cyber Training for Members

 Members agreed that this action could be closed subject to further dates being advertised.

3/2018/P – Shaping National Narrative

The Commissioner noted that report would be forthcoming in April 2019.

4/2018/P – Action Fraud Customer Experience

• The Commissioner noted that an update would be provided in April 2019 for this reference, alongside a walk-through demonstration.

5/2018/P - City & Guilds

 The Commissioner noted that City & Guilds was not currently a City of London Police training partner. Members agreed that this action could be closed.

RESOLVED, that the report be received.

5. NATIONAL LEAD FORCE PERFORMANCE: FOR THE 8 MONTHS TO 30 NOVEMBER 2018

Members considered a report of the Commissioner of Police regarding National Lead Force Performance for the 8 months to 30 November 2018 and the following points were made.

Pursue

 The Commissioner noted that the decrease in crimes reviewed by the National Fraud Intelligence Bureau (NFIB) compared to the previous year was not as stark as it appeared – the decrease was due to the way in which reports were disseminated from the NFIB to the City of London Police – more generally the NFIB was seeing an increase in crimes reported with a 60:40 split between online versus call centre reporting. The drop in cases reviewed was likely due to the new reporting system being bedded in.

- The Commissioner noted that work was being undertaken to establish why there had been a drop in webchat and that Members would be updated outside of the meeting (6/2019/P).
- The previous reporting system had left a backlog that had required some additional resource being given to the new reporting system in September 2018. There was no longer any backlog, and cases now being disseminated were new cases. The Force was working to ensure each new case was maximised in terms of the intelligence potential it offered.
- The Commissioner noted that the relevant Detective Chief Superintendent would update Members at the July 2019 meeting with regards to what the Force considered to be a best practice reporting and monitoring model (7/2019/P).
- In response to a question, the Commissioner noted that the Head of Action Fraud was reviewing the emerging trends of reporting to Action Fraud to ensure the Force was providing adequate resource. The Commissioner welcomed the current trend given that the British Crime Survey demonstrated that fraud tended to be an under-reported crime. The Force was currently managing the current scale of reporting through achieving efficiencies.
- In response to a comment, the A/Detective Chief Superintendent (Economic Crime) noted that fraud cases could last for as long as six to seven years – and the longer a case lasted, the greater the risk to posed to the Force in bringing it to a successful resolution – it was important therefore to adopt robust investigative strategies from the outset. 75% of City of London Police cases had lasted for over two years.
- The Head of the Strategic Delivery Unit (SDU) (Economic Crime) noted that the Force was measuring its level of engagement as, whilst it was comfortable with the current volume of engagement, it was intended to move to a more targeted approach. The Head of the SDU noted he was liaising with colleagues in Communications to establish how this could be achieved, and that he would report the outcome of those meetings to Members in due course (8/2019/P).
- In response to comments from Members, the Head of the SDU agreed to review the potential to approach Bloomberg and social media feedback opportunities including the creation of a LinkedIn page for the City of London Police Economic Crime Directorate (9/2019/P).

Prepare

- In response to a question from a Member regarding the number of arrests made as a result of the Banking Protocol, the Commissioner noted that the figure quoted was a national one and that the cases involved should be quick to bring to a satisfactory resolution, the main cause of any delay would be over whether the cases involved related to organised criminal network(s).
- In response to a recommendation from the Deputy Head of the Policy Authority Team, the Commissioner agreed to consult with the Authority's Head of Corporate Strategy regarding the presentation of the Resourcing section of the report going forward (10/2019/P).
- In response to a comment from a Member, the Commissioner agreed to provide a breakdown of 'Other' reported fraud in future reporting. The A/Detective Chief Superintendent (Economic Crime) advised that the current 'Other' figure was likely due to poor data input. The current level of data was useful in assisting the Force to prioritise its work (11/2019/P).
- The Head of the SDU noted that, as more data was collected, it would be possible to provide Members with oversight of seasonal variation in reported crime (12/2019/P).

RESOLVED, that the report be received.

6. BREXIT UPDATE

The Commissioner was heard regarding Brexit and the following points were made.

- The Commissioner noted that in the event of a No Deal Brexit, the Force would lose access to two key tools namely intelligence and arrest warrants, as the flow of intelligence between the UK and the EU was interrupted, and the UK had to relying on varying extradition treaties rather than the European Arrest Warrant (EAW). It should be noted that any EU citizens in the UK would not be subject to the EAW. As the terms of any Brexit deal were not yet known it was not possible to provide Members with an estimate of the likely impact.
- In response to a question, the A/Detective Chief Superintendent (Economic Crime) confirmed that the City of London Police could work via Interpol but the fact remained that the current working relationship with Europol was an effective one with a proven track record of delivery. The Commissioner added that the nature of the two institutions was different – Interpol was more a forum for liaison compared to Europol.
- In response to queries from a Member regarding the impact of Brexit on the requirement for foreign language qualifications, and in response what education and training the Force was providing in response, the

A/Detective Chief Superintendent (Economic Crime) noted that the Force was being guided by coordinated activity from the Home Office and National Crime Agency. Further education and training was on offer through the Economic Crime Academy.

 In response to a question, the Commissioner noted that Force Counter Terror officers proactively engaged with City businesses but faced a barrier in the form for high turnover of short-term office space. A Member suggested that the Force's approach to providers such as WeWork should be reviewed in light of this (13/2019/P).

RESOLVED, that the update be noted.

7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**There was no other business.

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD** There were no questions.

9. EXCLUSION OF THE PUBLIC

RESOLVED, that under Section 100 (A) of the Local Government Act 1972, the public be excluded from 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 Act.

10. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 28 November 2018 be approved as a correct record, subject to an amendment being made.

11. NON-PUBLIC OUTSTANDING REFERENCES

Members considered a report of the Town Clerk regarding non-public outstanding references.

12. ECONOMIC CRIME ACADEMY UPDATE

Members considered an update report of the Commissioner regarding the Economic Crime Academy.

13. ECONOMIC CRIME DIRECTORATE STAFF NUMBERS AT 30 NOVEMBER 2018

Members considered a report of the Commissioner regarding Economic Crime Directorate Staff Numbers as at 30 November 2018.

14. ECONOMIC CRIME VICTIM CARE UNIT PERFORMANCE TO 31 DECEMBER 2018

Members considered a report of the Commissioner regarding Economic Crime Victim Care Unit Performance to 31 December 2018.

15. **RESTRICTED ACTIVITY**

The Commissioner was heard regarding Restricted Activity.

- 16. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD** There were no questions.
- 17. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There was one item of other business.

The meeting ended at 12.30 pm
Contact Officer: Alistair MacLellan / alistair.maclellan@cityoflondon.gov.uk

Reference Number	Date	Action	Responsible Officer	Progress Update
1/2017/P	6 July 2017	Fraudulent Cryptocurrencies. The Chairman noted the recommendation at the last meeting from the Port Health and Environmental Services Committee that City of London Police address the issue of fraudulent cryptocurrencies on its website. The Head of Economic Crime confirmed that he would action this.	Commissioner	November 2018: In response to an update from the Commissioner noting that advice regarding fraudulent cryptocurrencies had been uploaded on to the City of London Police website, the Chairman requested that this reference be retained for the foreseeable future so that it could be periodically reviewed by the Board. Link is now on the Action Fraud website. January 2019: To be closed prior to April 2019 The national guidance that Action Fraud provides is that all force websites sign-post to Action Fraud for information on fraud to ensure a consistent approach and to encourage reporting to AF by fraud victims. If you look briefly at websites from Cambs, and Suffolk you will see they point to AF and do not detail any information on fraud. https://www.suffolk.police.uk/advice/personal-safety/fraud https://www.cambs.police.uk/A-to-Z?letter=F&services=&location=&keyword=
2/2017/P	27 July 2017	Cyber Training for Members. The feasibility of cyber training being given to all Council Members be followed up within the Corporation.	Commissioner	October 2017: The Detective Chief Superintendent suggested that it might be beneficial to invite a representative of the Economic Crime Academy to the following meeting in order to present and discuss feasible cyber training provision for Members.

Reference Number	Date	Action	Responsible Officer	Progress Update
2/2017/P cont.	27 July 2017	Cyber Training for Members. The feasibility of cyber training being given to all Council Members be followed up within the Corporation.	Commissioner	February 2018: The T/Commander of Economic Crime explained that Mike Betts was hoping to attend the Economic Crime Board but was unable to attend this meeting. He explained that it would be possible to provide a basic level training session for Members lasting around 2-4 hours. April 2018 The Commissioner explained that a draft proposal for a 2-hour cyber training session for up to 40 members had been drawn up and was tabled at the meeting. It was agreed that City of London Police would feed back with some proposed dates, and a schedule that could be run for Members of the Police Committee. June 2018 The Town Clerk and ECA representative agreed to carry out a 1hr session for Members of the Police Committee around one of the upcoming meetings. Pending approval of the Chairman, this is proposed to take place before or after the September/December meeting of the Police Committee. July 2018: The T/Commander of Economic Crime explained that they are presenting Cyber Griffin and could adapt this to create a session for all Members over the next 4-5 weeks if desired. Members agreed. It was agreed that this could be arranged for the morning of 20 September 2018 and made available to all Police Committee Members.

Reference Number	Date	Action	Responsible Officer	Progress Update
2/2017/P cont.	27 July 2017	Cyber Training for Members. The feasibility of cyber training being given to all Council Members be followed up within the Corporation.	Commissioner	November 2018. Training was booked for December 2018, however Town Clerk's Department then advised that this was no longer required. Head of ECD ECA has now re-engaged since the pre-meeting 9/11/18. January 2019. To be closed subject to further dates being advertised to Members March 2019. Commissioner spoken to and e-mailed Town Clerk to arrange a date. Recommendation is that Members are offered a Baseline Briefing and a Tabletop Exercise, to be offered in two tranches in April and June 2019 to maximise opportunity for Members to attend. So far c. 20 Members of Court of Common Council have been in receipt of Baseline Briefing/Tabletop Exercise training.
3/2018/P	28 November 2018	Agenda Item - Shaping national narrative around economic crime. Discussion of Economic Crime Board's role in shaping narrative around cybercrime to be an agenda item at a future meeting.	Commander Economic Crime	January 2019. Meetings are continuing and taking place to coordinate with media a strategy and key messaging.
4/2018/P	28 November 2018	Agenda Item – Action Fraud Customer Experience. Economic Crime Board to discuss customer experience and user-friendliness of Action Fraud.	Commander Economic Crime	January 2019. The Director of Action Fraud has been in contact with the Head of the NFIB to allocate this task. A date will be arranged. March 2019 (AF/NFIB) representative has contacted Town Clerk to arrange a meeting.

Reference Number	Date	Action	Responsible Officer	Progress Update
6/2019/P	21 January 2019	Agenda Item 5 – National Lead Force Performance. Members to be briefed on why a drop in the number(s) of webchat had been recorded.	Commander Economic Crime	There has indeed been a substantial reduction in the volume of web chats offered and handled by the Contact Centre since the implementation of the new web reporting tool. An investigation to establish the root cause for this decline identified the following: When initiating a web report via the old website, the reporting individual would receive a pop up message prompt shortly after accessing the home page & they could choose to select this option if they wished to utilise the Web Chat facility. The pop up prompt facility has not yet been enabled in the new reporting tool, so reporting persons can only access the Web Chat facility by clicking on the very small, red web chat button at the bottom left of the screen (which is easily missed) The icon does not provide a message when hovered over and may not be recognised by those with limited IT experience. This is believed to be the root cause of the reduction in volumes noted since the launch date. IBM have been made aware of the issue and are looking to provide a resolution in a future system update (believed to be in April)
7/2019/P	21 January 2019	Agenda Item 5 – National Lead Force Performance. Members to be updated on identified best practice of reporting and monitoring model.	Commander Economic Crime	Commander Economic Crime presented the new SOC Fraud structure from Perry Stokes to Deputy Head Police Authority Team and Chairman.

Reference Number	Date	Action	Responsible Officer	Progress Update
8/2019/P	21 January 2019	Agenda Item 5 – National Lead Force Performance. Members to be updated on development of a more targeted communications approach with stakeholders.	COLP Head of Communications	City of London Police Communications update – COLP is continuously updating is communications approach with stakeholders. A most recent example of this is the relaunch of Action Fraud and the engagement around this
9/2019/P	21 January 2019	Agenda Item 5 – National Lead Force Performance. Force to consider approaching Bloomberg and reviewing social media opportunities including a LinkedIn page.	COLP Head of Communications	City of London Police Communications update – COLP social media approach is constantly evolving and multiple social media channels are chosen for appropriate audiences
10/2019/P	21 January 2019	Agenda Item 5 – National Lead Force Performance. Commissioner to consult Authority's Head of Corporate Strategy regarding presentation of Resourcing section to Members.	Commissioner	Due to the new reporting format 7/2019P this has not taken place.
11/2019/P	21 January 2019	Agenda Item 5 – National Lead Force Performance. Commissioner to provide breakdown of types of 'Other' fraud.	Commissioner	Other Fraud (NFIB90) is a fraud category used for fraud types that are not classified under the other 56 types. Fraud that fall into the other category would be: Courier Fraud HMRC Bogus Phone Calls Identity Theft Phishing / Vishing / Smishing,

Reference Number	Date	Action	Responsible Officer	Progress Update
				There are also misclassifications likely due to the victim not fully understanding what has occurred or people who want to quickly submit an AF report
12/2019/P	21 January 2019	Agenda Item 5 – National Lead Force Performance. Members to be provided with oversight of seasonal variations of fraud.	Commissioner	Whilst reporting of different crime types fluctuates throughout the year, there are relatively few consistent seasonal trends among them. There was a consistent seasonal decrease in reporting levels during December. This is highly likely due to the festive holidays as reporting volumes then increase in January. NFIB3F Ticket Fraud has a regular seasonal increase during the summer months (May to August). This is almost certainly due to the large amount of ticketed events taking place in the summer. There is a consistent seasonal decrease in reporting of NFIB3A Online Shopping and Auctions during August. This is likely due to the summer holidays resulting in fewer people shopping online.
13/2019/P	21 January 2019	Agenda Item 6 - Brexit. Force to review engagement with short-term office space providers.	Commander Economic Crime	Verbal Update from Commander Economic Crime at April 2019 meeting.

Agenda Item 5

CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION

Committee(s):	Date(s):
Economic Crime Board	5 April 2019
Subject:	Public
National Lead Force Performance for the 11 months to	
28 Feb 2019	
Report of:	For Information
Commissioner of Police	
Report author:	
DCS Peter O'Doherty	

Summary

This report outlines the quantitative and qualitative performance of City of London Police as the National Lead Force (NLF) for Fraud for the eleven months to 28 February 2019, regarding National Fraud Intelligence Bureau, NLF/Fraud teams and Economic Crime Academy (ECA). Where data is available this performance has been compared against the same period for the previous year (PY).

Pursue

- For the eleven months to 28 February of 2019, Action Fraud crime reports to the NFIB totalled 308,883, a 14% 38,922 increase in the number of crimes reported to Action Fraud compared with the PY.
- At the end of February 2019, City of London Police ECD are currently managing 642 live investigations of which 59 are distinct to fraud teams/NLF.
- ECD has currently identified 12 active OCGs.

Protect

- The average Overall satisfaction with products and alerts issued by the NFIB is 94% (262/278). Highest levels of satisfaction are registered in relation to how alerts are "informative" and "clear".
 - 30 new materials have been created using gov-approved messaging with 7 public-facing alerts disseminated.
 - The overall reach of gov-approved messaging via policing was on average 4,850,389 per month over this current quarter with campaigns including: HMRC' Anti-Phishing, Safer Internet Day, Action Fraud's #fauxmance, and Cyber Aware's Life Updates.

Prepare

- Up to 28 February 2019, 83 courses delivered by the Economic Crime Academy (ECA) attended by 1,065 delegates, amounting to 3,748 training days delivered.
- 99% delegate satisfaction with the attended courses.

Victim Service – Action Fraud

- 96% (972/1,010) of those surveyed indicated that they understood the fulfilment recent email / letter received.
- 81% (361/444) of the respondents that reported via the new web reporting tool were satisfied with this service
- 66% (292/444) of these indicated that they were satisfied with the crime prevention advice found on the Action Fraud website.
- 95% (539/566) of the respondents that reported via the Contact Centre, were satisfied with how the call was handled by the advisor.
- 93% (526/566) of these respondents indicating that they were satisfied with the call handlers knowledge of the crime reported.

Recommendation(s)

It is recommended the Board note this report.

Main Report

1. BACKGROUND

This report outlines the quantitative and qualitative performance of City of London Police as the National Lead Force for Fraud for the 11 months to 28 February 2019. Where data is available this performance has been compared against the same period for the previous year.

The report is across five areas:

Pursue – to reduce the economic crime threat through the coordinated investigation of the individuals or groups engaged in economic crime and the disruption of their activities

Protect – to strengthen the protection of individuals, communities, systems and infrastructure against economic crime

Prepare – to reduce the impact of economic crime by dealing effectively with the ongoing criminality and future threat.

Prevent - prevent people being enticed into facilitating Economic Crime & Fraud, design prevent interventions.

Victim Service – to maximise victim service and satisfaction.

2. PURSUE

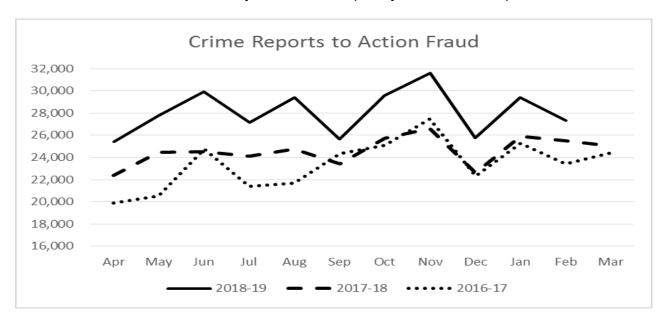
2.1 National Reporting - Crimes reported to Action Fraud

Crime reports to Action Fraud have continued to rise throughout 2018/19. The
month of February reflected a 7% rise (1,793) when compared to February
2018. YTD there has been a notable increase of 14% (38,922) in crimes
reported to Action Fraud.

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	YTD
2018/19 Crime Reports	25,397	27,761	29,899	27,139	29,400	25,640	29,599	31,581	25,792	29,378	27,297	308,883
2017/18 Crime Reports	22,362	24,446	24,543	24,100	24,780	23,443	25,738	26,574	22,585	25,886	25,504	269,961
% Increase (Decrease)	14%	14%	22%	13%	19%	9%	15%	19%	14%	13%	7 %	14%

 This increase can be attributed in part to the continued awareness and greater understanding of the Action Fraud reporting system.

Below table indicates the monthly volumes with prior year month comparatives.



^{*}June and August 2018 were high reporting months, August was particular driven by a large volume of other advance fee frauds being reported nationally.

National Dissemination Table:

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	YTD
2018/19 Crime Reports	4,810	4,915	4,849	4,628	6,115	3,398	7,289	4,461	3,174	4,578	4,369	52,586
2017/18 Crime Reports	3,790	5,418	4,977	4,327	4,305	4,710	4,860	4,616	3,733	5,668	4,729	51,133
% Increase (Decrease)	27%	-9%	-3%	7%	42%	-28%	50%	-3%	-15%	-19%	-8%	3%

^{**}Appendix A - indicates the volume by fraud type reported to Action Fraud, for the month of February 2019.

- For the 11 months to 28 February 2019, there has been a 3% (1,453) increase in the number of NFIB disseminations, to forces and LEAs with over the same time period last year.
- The new action Fraud system went live within the NFIB on Monday 15th October 2018. The increase in October is due to legacy cases from the old system being disseminated to forces.



Demand (Disseminations sent to CoLP from NFIB):

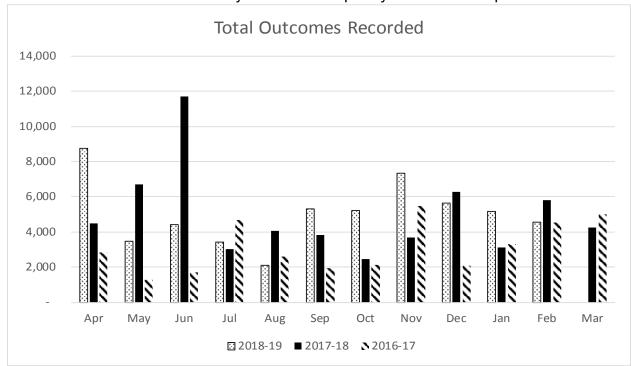
Disseminations	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Total
City of London	4	7	26	66	47	36	3	3	20	8	31	251
NLF	0	0	0	0	1	1	1	0	0	0	0	3
DCPCU	1	0	0	1	173	1	0	0	4	4	1	185
IFED	1	12	8	18	8	0	0	0	1		1	49
PIPCU	0	1	0	0	0	0	0	0			1	2
Total	6	20	34	85	229	38	4	3	25	12	34	490

The number of outcomes back from Forces is outlined in the table below.

Total Outcomes Reported	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Total
Judicial	1,451	470	1,095	339	293	735	1,029	1,005	714	656	600	8,387
NFA	7,283	3,025	3,325	3,083	1,828	4,584	4,204	6,348	4,922	4,502	3,978	47,082
Total	8,734	3,495	4,420	3,422	2,121	5,319	5,233	7,353	5,636	5,158	4,578	55,469

 NFIB are now receiving an average 5,000 outcomes per month, nationally back from forces for the 11 months to 28 February 2019.

• Below table indicates the monthly volumes with prior year month comparatives.



^{*}June 2017 was a high return month due to MPS returning 6,202 outcomes. 12% were judicial.

• Outcomes from CoLP

Outcomes	Force	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Total
Judicial	City of London	160					2	54		6		5	227
	DCPCU	2		3			2	7	177	1	2	1	195
	IFED	49					27	1			50		127
	National Lead Force		1			1							2
Judicial Total		211	1	3		1	31	62	177	7	52	6	551
NFA	City of London		20	5	43	2	19	15				4	108
	DCPCU	1		3			3		1	1	1	2	12
	IFED	77					5	16			69		167
NFA Total		78	20	8	43	2	27	31	1	1	70	6	287
Total		289	21	11	43	3	58	93	178	8	122	12	838

Summary

The table below shows a comparison of crimes reported, disseminations and recorded outcomes at the Year End point for the past three years.

	2015/16	2016/17	2017/18	17/18 - 16/17 change	11 Months to 28 Feb 2019
Crime reports to Action Fraud	234,201	280,706	294,984	5% ▲	308,883
Disseminations	72,654	68,606	55,671	19% ▼	52,586
Judicial outcomes	9,873	8,105	9,476	17% ▲	8,387
Non-judicial outcomes	26,346	28,146	49,968	78% ▲	47,082
Total outcomes	36,219	36,251	59,444	64% ▲	55,469
Outcome %	15%	13%	20%	7%▲	18%

^{*}Appendix 1 – Shows for February 2019; reports to AF

2.2 National Disruptions - NFIB

• There were **646** website suspension requests and 885 email suspension requests made to the first 11 months to 28 February 2019, compared to 694 and 585 respectively for the prior year period to 28 February 2018.

2.3.1 Organised Crime Group Disruptions

 At the time of reporting, the ECD has currently identified 12 active OCGs. As of February, a further 105 were deemed inactive. All are currently mapped, across fraud, counterfeit goods or ML offences.

2.4 National Lead Force Referrals

- Investigations are categorised into City of London Police cases and NLF cases. City of London Police cases are those investigations into matters occurring within the jurisdiction of the square mile and NLF cases are those which have satisfied the NLF cases acceptance process. A majority of City of London Police cases have a national or complex element to them and such factors would constitute a NLF enquiry. Overlap between the categories of City of London Police and NLF is often due to international enquiries, possible threats to the UK economy, and high volumes of victims and the complexity of enquiries.
- In total, as of 28th February, there are 59, NLF/ City based fraud investigations, 175 from the Money Laundering Investigations unit and an additional 408 being conducted by CoLP funded units, this totals as follows (IFED 246, PIPCU 51, DCPCU 111).

NLF OPERATIONS UPDATE

- CoLP through its NLF Fraud Investigation Teams is currently managing in excess of 11,000 victims
- NLF and Fraud teams are now working to a set of new key operational principles focussed on effective and efficient investigations, a key ambition is to expedite investigations and progress cases to outcome within a 2 year period.

PROTECT

3.1 Quality and reach of NFIB protect alerts

At the time of completing the survey recipients are also encouraged to provide feedback to help the continuous improvement of the products and alerts created.

		11 months to 28 February 2019
	<u>all</u> respondents tisfied with the	94% (262/278)
Percentage	Informative	90% (251/278)
of	Relevant	89% (246/278)
respondents	Timely	70% (223/278)
agreeing that	Clear	91% (252/278)
the alerts were:	Actionable	77% (213/278)

To increase the reach of alerts City of London Police uses additional platforms, such as the Neighbourhood Alerts Service which currently has **560,000** contactable users, which then reach in turn approximately 3 million individuals.

3.2 Social Media

Action Fraud has continued to deliver and increase its digital reach during 2018/19, sharing several key Pursue and Protect messages. In order to achieve the greater reach Action Fraud has achieved an increase in both Twitter and Facebook followers.

Action Fraud currently has:

• **51,608** Twitter followers which reached in excess of 1 million people (1,049,051)

• **52,410** Face Book followers which reached 437,852 people

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb
Number of unique web site visitors	294,096	295,920	301,635	314,708	265,553	290,793	267,155	221,775	165,911	226,029	201,418
Number of website impressions	898,625	889,778	922,896	1,169,867	1,025,362	1,091,693	778,543	545,446	405,594	552,657	487,805
Number of Facebook impressions	1,097,813	676,403	698,464	1,416,527	1,009,342	931,156	958,740	822,797	575,583	569,191	437,852
Number of Twitter impressions	1,171,903	985,010	1,164,593	1,295,485	1,347,600	1,042,400	957,414	1,307,244	1,120,978	706,289	1,049,051
Website page visits from Facebook	8,739	7,725	6,609	24,143	9,465	12,953	9,879	7,737	6,893	11,654	8,581
Website page visits from Twitter	3,020	2,336	2,260	6,394	2,923	2,377	1,814	1,652	1,193	2,135	2,397
Cumulative number of Twitter followers	45,112	45,574	46,115	46,669	47,352	48,101	48,507	49,811	50,357	50,988	51,608
Cumulative number of Facebook follow	44,805	15,246	45,838	46,856	47,534	48,300	49,107	50,481	51,247	51,945	52,410
Action Fraud Twitter engagements	20,212	16,950	15,454	25,708	16,421	14,416	19,326	16,151	8,713	8,734	13,653

3.2.1 Media stories

Action Fraud's fauxmance campaign:

 Don't invest your heart in a fauxmance: Latest Action Fraud campaign warns that victims lost over £50 million to romance fraud in 2018. This is an average of £11k per victim.

DCPCU:

 A gang of fraudsters based in South London who used compromised card details and "money mule" accounts to commit almost £200,000 of fraud have been sentenced at Southwark Crown Court. This follows a successful investigation by the Dedicated Card and Payment Crime Unit (DCPCU). As a result, a total of ten defendants were sentenced to over nine years in prison.

IFED – Commercial Property Fraud

- The Insurance Fraud Enforcement Department (IFED), which has now secured 239 years in custodial sentences, is celebrating its seven year anniversary this month (January 2019).
- Since its inception in 2012, IFED has convicted 433 insurance fraudsters, leading to 239 years in custodial sentences, 108 years in suspended sentences, 13,355 hours in community orders and over £100,000 in fines.
- The unit's financial investigators have also made 135 financial orders, with a total of £2,647,738 being forfeited by insurance fraudsters

NCO / NLF

- In a first for the City of London Police, Commander Karen Baxter and Detective Chief Supt Pete O'Doherty attended Parliament's Treasury Select Committee at the House of Commons on Tuesday 8 January 2019 to talk about the impact of economic crime on consumers.
- The ongoing inquiry is looking at the current regulatory landscape, weaknesses in legislature, the scale of economic crime, the latest trends,

- consumer education and the effectiveness of financial institutions in combatting economic crime.
- Chaired by Nicky Morgan MP, the Committee highlighted the important contributions that Action Fraud, the NECC and the Banking Protocol have made toward combatting fraud nationally.

3.3 Protect Campaigns and Events

Coordinating a national response

- NFIB Cyber PROTECT team have conducted a number of activities with the aim of reducing the impact of cybercrime over the quarter. This has included supporting and coordinating the ROCUs by producing new materials and supporting national campaigns. Current figures to date for the quarter:
 - 30 new materials have been created using gov-approved messaging with 7 public-facing alerts disseminated.
 - The overall reach of gov-approved messaging via policing was on average 4,850,389 per month over this current quarter with campaigns including: HMRC' Anti-Phishing, Safer Internet Day, Action Fraud's #fauxmance, and Cyber Aware's Life Updates.
- Over the quarter we have also taken part in 7 engagements with public and industry, including being on the BBC's Fake Britain, Crimewatch Roadshow, and Radio 4, and support industry at HSBC International Franchise Expo and the regional network at the All Wales Cyber Bus Tour.
- NFIB have recently joined a forum which is aimed at helping the police, and our public and private sector partners to share information, discuss ideas and opportunities and encourage greater collaboration. This allows for us to have increased access to front-line staff / officers ensuring they have access to the latest PROTECT advice – developing our cyber capabilities.

Working in partnership

- NFIB Cyber PROTECT continue to work collaboratively with other organisations to support the aims and objectives of the National Cyber Security Strategy.
- NFIB recently met with the NCSC to discuss advice to victims and how best as Team Cyber UK we can continue to PROTECT individuals and organisations against cyber crime in the future.
- NFIB hosted the Multi-Agency Campaign Group quarterly meeting. We discussed best practice from Fraud Advisory Panel's Charity Fraud

Awareness Week and the latest on GCA's Cyber Security Toolkit for Businesses.

Enhancing the threat picture

- NFIB Cyber PROTECT continue to lead on producing the latest intelligence for law enforcement and supporting the development of front-line cyber policing.
 - The intelligence team have produced x45 Cyber Force Profiles, a TV Licensing Phishing Alert, and a reporting on Malware over the quarter and provided analytical support to the a number of partner agencies.

PREPARE

4.1 Economic Crime Academy (ECA)

The ECA is piloting a Specialist Fraud Investigators Programme with Guernsey police specifically aimed at crown dependencies. If successful it will be promoted to others in this group.

Statistical update – to 28 February 2019

	PYTD	2018/19 YTD	% Change
Total courses	83	91	10% ▲
Total course delegates	1,065	911	14% ▼
Total delegate days delivered	3,748	3,708	1% ▼
Delegate satisfaction	99%	99%	0%

ECA Police Transformation Fund Grant

- The bid for a grant from the Home Office's Police Transformation Fund (PTF) was successful. The grant, which runs from April 2018 until March 2020, was not confirmed until mid-financial year.
- Due to the late confirmation of the funding most previously 'open' courses run from April 2018 have been converted to be run as PTF courses. Forces have been informed about the funding and advised as to their allocation of places over the two year period.
- The Police Transformation Fund (PTF) training has progressed well with the ECA expecting to train a total of 238 delegates across the two courses this financial year.
- There have been five mentors courses run to date and more are being timetabled throughout next year. The mentors assist the delegates from the SFI

course to complete their portfolio of evidence when back in the workplace. These sessions are included in the price of the SFI course.

- PTF courses to February have been run solely using current ECA staffing which
 is not sustainable for the uplift in courses in 2019/20. Only two of the four PTF
 trainers have been successfully recruited with associate trainers and business
 as usual (BAU) trainers covering the shortfall which may not be sustainable in
 the medium to longer term and has led to BAU work having to be turned down.
- The immersive learning contract has been awarded; this will significantly enhance the learning experience on the courses, replacing paper feeds for the case studies and allowing more options when exploring how the investigation progresses. The hardware is expected to be ready for end March 2019. The case studies need writing and then loaded onto the system with the expectation the pilot will be in June.

4.2 National force engagement

Banking Protocol update

	Feb-19	11 months to Feb-19
Amount Prevented	3,270,031	35,671,600
Arrests	15	230
Emergency calls made	597	5,818

- Banking Protocol was developed as a partnership between the finance industry, police and Trading Standards, the Banking Protocol enables bank branch staff to contact police if they suspect a customer is in the process of being scammed, with an immediate priority response to the branch. Branch staff, call handlers, police and trading standards officers in each area have all been trained in the Banking Protocol and the steps that need to be taken when a customer is at risk
- As well as stopping frauds taking place, the scheme ensures a consistent response
 to potential victims and gives them extra support to prevent them becoming a victim
 in the future.

HMICFRS Inspection programme update

- The thematic report in to fraud is due to be published this quarter (end March 2019 / beginning April 2019) and an Action Plan for recommendations affecting CoLP is being prepared.
- The NFIB and Action Fraud were inspected in February as part of the Cyber Dependent crime thematic inspection, the fieldwork in forces will continue until June 2019, CoLP is not being inspected as a force for this report, just its national cyber reporting remit. It is expected that the cyber-dependent thematic report will be published late 2019 early 2020

5 PREVENT

5.1 Pilot - Mini Police

- Sessions and content have been tested with various year groups at a school outside of London. Feedback has been positive and supported the development of content, to ensure it is both topic and age appropriate.
- COLP has re-engaged with Sir John Cass's Primary School and will be running more sessions after Easter.
- The National VPC is currently conducting a large scale evaluation with academic researchers on Mini Police programmes across the country. The findings of this are expected to be published in the spring and will inform how COLPs programme is rolled out on a wider basis.

VICTIM SERVICE

6.1 Action Fraud reporting satisfaction

- From April 2018 until 30th September 2018, 5,335 victims completed the Old online Action Fraud reporting satisfaction survey template which collated positive, neutral and negative responses. 91% of the victims who received confirmation that their report had been recorded as a crime had a positive or neutral experience of the process.
 - o 73% (3,911 / 5,335) had a positive experience
 - o 18% (951 / 5,335) had a neutral experience
- On the 6th of October 2018, 14 new surveys were introduced simultaneously with the launch of the web tool, replacing the previous satisfaction survey. The new surveys capture victim satisfaction from the start to the end of the reporting process and contain questions specific to the fulfilment letter / email received. A number of surveys now collate responses from victims who reported using the online reporting tool and those that reported via the Contact Centre, separately. The surveys no longer contain the question asked in the old survey "how satisfied were you with the Action Fraud reporting service" therefore no single comparison figure can be provided for the post launch period.
- From October 6th 2018 to date, 2,693 victims have completed one of the new Action Fraud fulfilment satisfaction surveys. The satisfaction scores below, reflect the three combined positive responses provided by victims who have received fulfilment confirming that their report has been recorded as a crime.
- From October 6th 2018 to date Action Fraud, "Confirmation of Crime Report Submitted (Non-Police) fulfilment survey".
 - 96% (972/1,010) of those surveyed indicated that they understood the fulfilment recent email / letter received.

- 81% (361/444) of the respondents that reported via the new web reporting tool were satisfied with this service
- 66% (292/444) of these indicated that they were satisfied with the crime prevention advice found on the Action Fraud website.
- 95% (539/566) of the respondents that reported via the Contact Centre, were satisfied with how the call was handled by the advisor.
- 93% (526/566) of these respondents indicating that they were satisfied with the call handlers knowledge of the crime reported.

6.2 Action Fraud Complaints

- Recorded complaints have invoked 'service recovery' using the Action Fraud Complaints policy, so PSD now only consider complaints for recording under Schedule 3 PRA 2002.
- This also gives us a more informed basis for making a decision to record or not.
- As a result we are informally resolving service recovering, and non-recording more complaints that reach PSD.

6.3 City of London Police Economic Crime Directorate victim satisfaction – All departments

 No surveys have been undertaken during this financial year, this is due to the fact that approval of new GDPR compliant survey letters has yet to be received, the contract with data handlers ORS is still in place.

6.4 Value for Money

Return on Investment

- The Return on Investment measure (ROI) which allows for the assessment of the cost of the resources invested against the monetary value of the fraud prevented over a period of time.
- Expenses of a unit are measured against the potential value of criminal gains prevented, i.e. Asset recovery, bank cards seized, website disruption and arrest activity by units within ECD.

	Q1 2018/19	Q2 2018/19	Q3 2018/19	2 months to 28 Feb 2019
Return on Investment	£63.71	£12.82	£51.64	£9.12

- ROI for the Q3 2018/19, 3 months to 31 December 2018 returned £51.64, this was driven by 2 disruptions from the NFIB (Mandate Fraud) and PIPCU confirming 8,160 website disruptions, the highest recorded in any quarter.
- Due to the timing of this report, Q4 ROI is currently low as disruption results have yet are returned from web providers.
- The YTD average ROI for the 11 months to 28 February is £34.32 against 2017/18 which returned £25.28.

6.5 Resourcing - @ 28th February 2019

The summary table below shows the number of posts in each ECD department, including both police officers, members of police staff and temp staff. This will be monitored on a monthly basis.

Department	Po	lice	Variance	St	aff	Variance
Department	Model	Strength	over/	Model	Strength	over / (under)
SMT	4.00	2.00	(2.00)	0.00	0.00	0.00
OACU	0.00	0.00	0.00	0.00	1.00	1.00
DCPCU	13.00	12.00	(1.00)	5.00	4.00	(1.00)
IFED	34.00	34.00	0.00	12.00	11.86	(0.14)
Money Laundering	12.00	9.73	(2.27)	0.00	0.00	0.00
PIPCU	13.00	13.00	0.00	7.00	5.00	(2.00)
Asset Recovery & SARS	14.00	15.00	1.00	8.77	7.77	(1.00)
Government (Secondment)	1.00	2.00	1.00	0.00	0.00	0.00
Fraud Investigation fraud desk	49.00	48.20	(0.80)	9.00	12.80	3.80
Fraud Academy	7.00	8.00	1.00	6.00	4.00	(2.00)
NFIB / Action Fraud	23.00	24.54	1.54	62.10	67.26	5.16
National Co-ordinators Office	4.00	4.00	0.00	14.00	10.77	(3.23)
SDU	3.00	2.00	(1.00)	5.00	2.00	(3.00)
ECVCU	0.00	0.00	0.00	0.00	16.16	16.16
Total	177.00	174.47	(2.53)	128.87	142.62	13.75

Excluding ECVCU, Police staff would be 126.46, and 2.41 under strength. ECVCU was excluded from the model due to funding uncertainty.

[Over - where the unit has more FTEs than the model, (under) - where the unit has less FTEs than the model]

Sickness

• In February 2019 across ECD there were 45 instances of absence from work (Current and ongoing).

6. APPENDICES

 Appendix A - indicates the volume by fraud type reported to Action Fraud, for month of February 2019.

7. Glossary of terms

- ABI- Association of British Insurers
- AF- Action Fraud
- BP Banking Protocol
- BRT- Business Reporting tool
- CFA- Criminal Finance Act
- CMA- Competition and Markets Authority
- CNP Crime- Card Not Present crime
- COLP City of London Police
- DCPCU Dedicated Card and Payment Crime Unit
- DPA- Data Protection Act
- ECB- Economic Crime Board
- ECD Economic Crime Directorate
- ECVCU Economic Crime Victim Care Unit
- FCA Financial Conduct Authority
- FIU Fraud Investigation Unit
- FIM- Fraud Investigation Model
- FSA- Financial Services Authority
- FSA- Food Standards Agency
- GDPR- General Data Protection Regulations
- GMP Greater Manchester Police
- HMICFRS Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services
- IFED Insurance Fraud Enforcement Department
- IOM Integrated Offender Management
- IOM Integrated Operation Model
- IPO Intellectual Property Office
- JFT Joint Fraud Taskforce
- KPA Key Performance Analysis
- KPI Key Performance Indicators
- KPQ- Key Performance Questions
- MOU Memorandum of Understanding
- MPS Metropolitan Police Service
- NCA- National Crime Agency
- NCO National Coordinators Office
- NCSC National Cyber Security Centre
- NECC- National Economic Crime Centre
- NFIB National Fraud Intelligence Bureau
- OACU- Overseas Anti-Corruption Unit
- OCG Organised Crime Group
- P&A- Performance and Accounts
- PIPCU Police Intellectual Property Crime Unit
- PIT Team- Proactive Intelligence team
- PMG Performance Management Group
- POCA- Proceeds of Crime Act
- PPPP Prevent/Pursue/Prepare/Protect

- PRA Police Regulatory Authority
- PSD Professional Standards Department
- PTF Police Transformation Fund
- R&A- Research and Analysis
- ROCU Regional Organised Crime Unit
- ROI Return on Investment
- SAR Suspicious Activity Report
- SLA Service Level Agreement
- SLT Senior Leadership Team
- SME's Small/Medium Enterprises
- SME's-Subject Matter Experts
- TTCG- Tactical Taskings Coordination Group
- VCR Victim Care Reviewer
- VPC Volunteer Police Cadets
- VV (two V's) Vulnerability & Victim Care
- WMP West Midlands Police

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NOT PROTECTIVELY MARKED

APPENDIX 1 Crime Reports to Action Fraud for February 2019

Fraud Type	Feb-19
NFIB90 Other Fraud	5,893
NFIB3A_Online_Shopping_And_Auctions	5,115
NFIB5A_Cheque_Plastic_Card_And_Online_Bank_Accounts	2,464
NFIB1H_Other_Advanced_Fee_Frauds	2,225
NFIB3E_Computer_Software_Service_Fraud	2,073
NFIB3D_Other_Consumer_Non_Investment_Fraud	1,552
NFIB7_Telecom_Industry_Fraud	749
NFIB52C Hacking Social Media And Email	689
NFIB2E Other Financial Investment	659
NFIB3F Ticket Fraud	554
NFIB5D Mandate Fraud	543
NFIB5B_Application_Fraud	468
NFIB1D_Dating_Scam	442
NFIB50A_Computer_Viruses_Malware_Spyware	413
NFIB1G_Rental_Fraud	355
NFIB3C_Door_To_Door_Sales_And_Bogus_Tradesmen	322
NFIB3G_Retail_Fraud	283
NFIB1J_Lender_Loan_Fraud	280
NFIB52E_Hacking_Extortion	243
NFIB2A_Share_Sales_Boiler_Room_Fraud	239
NFIB52A_Hacking_Server	239
NFIB19_Abuse_Of_Position_Of_Trust	229
NFIB3B_Consumer_Phone_Fraud	223
NFIB2B_Pyramid_Or_Ponzi_Schemes	209
NFIB52B_Hacking_Personal	195
NFIB1E_Fraud_Recovery	145
NFIB1A_419_Advance_Fee_Fraud	128
NFIB8A_Corporate_Employee_Fraud	126
NFIB1B_Lottery_Scams	68
NFIB6B_Insurance_Broker_Fraud	63
NFIB4A_Charity_Fraud	55
NFIB1C_Counterfeit_Cashiers_Cheques	40
NFIB17_Other_Regulatory_Fraud	32
NFIB16C Pension Liberation Fraud	29
NFIB1F_Inheritance_Fraud	27
NFIB8B Corporate Procurement Fraud	16
NFIB51A Denial Of Service Attack	15
NFIB52D_Computer_Hacking_PBX_Dial_Through	13
NFIB15 HMRC Fraud	13
NFIB5E_Dishonestly_Retaining_A_Wrongful_Credit	12
NFIB18_Fraud_By_Failing_To_Disclose_Information	11
NFIB16B_Pension_Fraud_Committed_On_Pensioners	10
NFIB6A_Insurance_Related_Fraud	9
NFIB2D_Time_Shares_And_Holiday_Club_Fraud	9
NFIB9_Business_Trading_Fraud	9
NFIB10_False_Accounting	8
NFIB12_Passport_Application_Fraud	8
NFIB13_DWP_Fraud	4
NFIB20A_DVLA_Driver_License_Application_Fraud	4
NFIB14_Fraudulent_Applications_For_Government_Grants	3
NFIB4B_Fraudulent_Application_For_Charity_Grants	2
NFIB11_Bankruptcy_And_Insolvency	2
NFIB51B_Denial_Of_Service_Attack_Extortion	1
NFIB5C_Mortgage_Related_Fraud	1
Grand Total	27,308

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



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



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



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



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



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

