



Economic Crime Committee of the City of London Police Authority Board

Date: WEDNESDAY, 3 FEBRUARY 2021

Time: 10.00 am

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members:

Deputy James Thomson (Chairman)	Andrew Lentin
Douglas Barrow	Deputy Robert Merrett
Nicholas Bensted-Smith	Benjamin Murphy
Tijs Broeke	James Tumbridge
Alderman Emma Edhem	Deputy Philip Woodhouse
Alderman Timothy Hailes	Dawn Wright

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Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:
<https://youtu.be/EhKi5Gaq8V4>

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

John Barradell
Town Clerk and Chief Executive

Date of Next Meeting
Wednesday 5 May 2021 at 10:00 am

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 agree the public minutes and non-public summary of the meeting held on 16 November 2020.

For Decision
(Pages 1 - 4)

4. **CHAIRMAN'S PUBLIC UPDATE**

The Chairman to be heard.

For Information

5. **ASSISTANT COMMISSIONER'S PUBLIC UPDATE**

The Assistant Commissioner to be heard.

For Information

6. **ANNUAL REVIEW OF TERMS OF REFERENCE**

Report of the Town Clerk.

For Decision
(Pages 5 - 8)

7. **ECONOMIC CRIME ACADEMY UPDATE**

Report of the T/Commander.

For Information
(Pages 9 - 10)

8. **NATIONAL LEAD FORCE (NLF) IMPLEMENTATION PLAN**

Report of the Assistant Commissioner.

For Information
(Pages 11 - 14)

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

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

11. **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 item(s) 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

12. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 16 November 2020.

For Decision
(Pages 15 - 18)

13. **CHAIRMAN'S NON-PUBLIC UPDATE**

The Chairman to be heard.

For Information

14. **ASSISTANT COMMISSIONER'S NON-PUBLIC UPDATE**

Assistant Commissioner to be heard.

For Information

15. **NON-PUBLIC REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 19 - 22)

16. **ECONOMIC CRIME DIRECTORATE PERFORMANCE REPORT - Q3 OCTOBER - DECEMBER 2020**

Report of the Commissioner.

For Information
(Pages 23 - 38)

17. **NEXT GENERATION SERVICE UPDATE**

Report of the Service Delivery Director.

For Information
(Pages 39 - 40)

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

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

**ECONOMIC CRIME COMMITTEE OF THE CITY OF LONDON POLICE
AUTHORITY BOARD**

Monday, 16 November 2020

Minutes of the meeting of the Economic Crime Committee of the City of London Police Authority Board held virtually on Monday, 16 November 2020 at 9.00 am

Present

Members:

Deputy James Thomson (Chairman)
Nicholas Bensted-Smith
Tijs Broeke
Alderman Emma Edhem
Alderman Timothy Hailes
Deputy Robert Merrett
Benjamin Murphy
James Tumbridge
Deputy Philip Woodhouse
Dawn Wright

City of London Police Authority:

Simon Latham	- Deputy Chief Executive
Oliver Bolton	- Deputy Head of Police Authority Team
Polly Dunn	- Town Clerk's Department
Chloe Rew	- Town Clerk's Department
James Gibson	- Chamberlain's Department

City of London Police Force

Clinton Blackburn	- T/Commander
Rebecca Riggs	- Detective Chief Superintendent
Christopher Glover	- City of London Police
Alix Newbold	- City of London Police
Jennifer V	- City of London Police

1. APOLOGIES

Apologies were received from Andrew Lentin.

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

There were none.

3. **MINUTES**

RESOLVED, that – the minutes of the previous meeting held on 12 October 2020 be agreed as a correct record.

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

The Chairman advised that moving forward, there would be a Chair's verbal update and a National Lead Force verbal update in both public and non-public to address key issues not covered elsewhere in the agenda.

Chairman's Update

- National Lead Force: a report was presented to the Association of Police and Crime Commissioners West Midlands Fraud Forum in mid-November which addressed the role of the Force as national lead on Action Fraud. This coincided with a report by West Midlands done in conjunction with Birmingham University which sought to comment on the successes, strategies and shortfalls of addressing economic crime. This received coverage in The Times around fraud and past criticisms around Action Fraud. The Chairman was working with the Force on this to improve how the Force engages with West Midlands around many recommendations from the report and forum, and to ensure appropriate public narrative around this.
- The Home Office was conducting a review of the Strategic Policing Requirements for Police Forces in England and Wales, with an aim to ensure that fraud was more prominently included in the strategic policing requirement; that forces were held to account for performance on fraud; and that appropriate skills and resources were allocated to anti-fraud work.
- The Police Authority Board was considering an invitation to present to the All-Party Parliamentary Group on Fraud in May 2021.
- The Force was working on the production of a strategic communication and engagement plan to address how the Force positioned itself with other stakeholders around tackling fraud. This was to ensure that the Force was proactive in its communications.
- The Lead Force Operations Room had had its soft launch, with a full launch anticipated in due course to promote the work of the Force to combat fraud.

T/Commander's Update

- There had been a decrease in economic crime relating to COVID-19, which currently accounted for less than 1% of economic crime.
- The Force recently had a two-week campaign for education and awareness around romance fraud.
- The initial Lead Force Operations Room launch was successful, and the Force was optimistic about a broader launch. There would be a push in December to highlight the importance of elevating fraud on PCCs' agendas and raise awareness of fraud-related crimes.

- Procurement for the new Action Fraud system was ongoing. The soft market testing stage was complete, potential bidders were identified and a business case would be put to the Home Office early next year.
- A spending review bid had been put to the Home Office to improve the capability and capacity across policing, and a response was anticipated for December.
- There had been a push to engage with stakeholders to raise the profile of fraud in Parliament, the public and private sector, as one third of all crime is economic crime.

Questions:

Deputy Woodhouse sought confirmation on when the strategic engagement plan would be presented to the Economic Crime Committee. The T/Commander advised that the draft had been written by the Director of Communications, and needed to be reviewed by the Commissioner and SMB. Although a release date could not be projected, the Chairman requested that the Force circulate a timeline for completion to the Committee with an aim to circulate the plan before Christmas.

Deputy Woodhouse requested information on the extent of the banks' involvement in addressing organised crime. The T/Commander noted that the Force had a close relationship with banks. Banks were heavily involved with initiatives such as the national Economic Crime Centre; Operation Recall which prevented victims' money from going into suspects' accounts; and Operation Olaf which utilised money trapped in making to good effect in combatting economic crime.

5. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There was no other business.
6. **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 item(s) 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.
7. **NON-PUBLIC MINUTES**
RESOLVED, that – the non-public minutes of the meeting held on 12 October 2020 be agreed as a correct record, subject to one amendment.
8. **NON-PUBLIC REFERENCES**
Members considered a joint report of the Town Clerk and Commissioner regarding non-public references.
9. **ECONOMIC CRIME DIRECTORATE PERFORMANCE REPORT Q2 JULY-SEPTEMBER 2020**
Members considered a report of the Commissioner regarding Economic Crime Directorate Performance Q2 July – September 2020.

10. **ECONOMIC CRIME ACADEMY UPDATE**
Members considered a report of the T/Commander (Economic Crime) regarding the Economic Crime Academy.
11. **UPDATE ON PROCUREMENT OF NEXTGEN SYSTEM**
Members received a report of the Detective Chief Superintendent relative to an update on procurement of the NextGen System.
12. **COVID-19 - COURT BACKLOGS**
Members received an update of the T/Commander regarding COVID-19 Court Backlogs.
13. **PCC ENGAGEMENT AND FORCE ACCOUNTABILITY**
Members received a joint report of the T/Commander and the Town Clerk with respect to PCC Engagement and Force Accountability. The matter was addressed in public session as the Chairman determined that the report did not contain sensitive information exempt by virtue of Part 1, Schedule 12A of the Local Government Act 1972. The Chairman noted that the matter was largely covered in the Chairman and Commanders' verbal updates.

RESOLVED, that – the report be received and its contents noted.

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no non-public questions.
15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no other non-public business.

The meeting ended at 10.45 am

Chairman

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Agenda Item 6

Committee(s) Economic Crime (City of London Police Authority Board) Committee	Dated: 3 February 2021
Subject: Annual Review of Terms of Reference	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	3, 8 & 10
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: The Town Clerk	For Decision
Report author(s): Polly Dunn, Senior Committee and Member Services Officer	

Summary

This report calls for the annual review of the Committee's own Terms of Reference, for recommendation to the Board for final approval.

Recommendation(s)

Members are invited to:

- consider the proposed change in membership of the Committee;
- approve, subject to any comments, the terms of reference of the Committee (as set out in **appendix 1**) for submission to the City of London Police Authority Board for final approval; and
- consider whether any change is required to the Committee's frequency of meetings.

Main Report

1. Each sub-committee of any Grand Committee of the Court of Common Council is provided an opportunity to consider the relevance and effectiveness of its own Terms of Reference in the discharging of its delegated responsibilities.
2. It is proposed that the remit of the ECC be broadened to cover the City of London Police National Lead Force Plan, private sector partnerships in this area, Cyber Griffin, and the newly acquired National Police Chiefs Council (NPCC) Cyber Portfolio.

3. In addition to this, the Board has also considered the amendment its Committee's memberships to include up to two external Members, to be appointed by the Police Authority Board.
4. The draft terms of reference are provided within the appendix for your consideration. Additions are underlined and redactions are ~~struck-through~~.
5. The Committee is also invited to review the frequency of its meetings. At present the Committee is scheduled to meet on a quarterly basis.

Corporate & Strategic Implications

6. Members should consider the current scope of the Board's Terms of reference, and bear in mind the impact of any proposed changes, particularly resource, legal and equalities implications.

Conclusion

7. Amendments to the Terms of Reference are put forward for the consideration of Members, for onward approval by the City of London Police Authority Board.

Appendix 1 – Draft Terms of Reference of the Economic Crime Committee 2021/22

Polly Dunn

Senior Committee and Member Services Officer

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Economic Crime Committee

Composition

- Up to six Members of the Police Authority Board appointed by the Police Authority Board (in addition to the Chairman and Deputy Chairman of the Board).
- Up to four co-opted Members to be appointed by the Police Authority Board.
- Up to two external Members, to be appointed by the Police Authority Board.

Terms of Reference

To be responsible for:

- a. Overseeing the force's national responsibilities for economic crime and fraud having regard to the strategic policing requirement in this area;*
- b. monitoring government, and other external agencies' policies and actions relating to economic crime;*
- c. overseeing the delivery of the City of London National Lead Force Plan;*
- d. Monitoring the implementation of any external review recommendations related to economic crime & fraud (including, but not restricted to, Mackey Review, HMICFRS Fraud related inspections, Tori Consultant Review);*
- e. Overseeing of the City of London Police's private sector partnerships with regard to the tracking of fraud & economic crime as well as the joint Cyber Griffin Project;*
- f. Overseeing the business strategy, service and financial performance of the Economic Crime Academy;*
- g. Overseeing the Force's national responsibilities as the National Police Chiefs Council (NPCC) lead for the Cyber Portfolio;*
- h. overseeing the work of Cyber Griffin initiative; and*
- i. making recommendations to the Police Authority Board in any other matters relating to economic crime.*

Frequency of Meetings

Quarterly

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Committee(s)	Dated:
Economic Crime Committee	3 February 2021
Subject: Economic Crime Academy Update	Public
Report of: T/Commander Clinton Blackburn	For Information
Report author: Christopher Felton	

Introduction

1. This report provides an update on the Economic Crime Academy and provides a picture of the current position.

Current Position

Priority setting

2. A workshop was conducted with representatives from City of London Police and Police Authority in January 2020. This was to consider the future direction of the Academy including their role in the national landscape, priorities and operating and funding model. Next steps are to set this out in a document for further consultation.

Training and impact of Covid-19

3. Face to face training has once again been suspended due to government restrictions. Where possible delegates have been offered the option of virtual delivery where practical. The need to move to online training during lockdown has provided opportunity for the Academy to test how it delivers training which will support the move to a more blended approach to future training delivery.
4. This has included the Fraud Foundation Investigators Programme (FIPP) which is being delivered to Police Staff Investigators across England and Wales under Home Office funding. All participating forces have agreed to virtual delivery of the FIPP and this course is now being delivered as a blended course with virtual sessions and online modules. The Academy has also been approached by the Food Standards Agency to provide a virtual FIPP course in March for their staff.
5. Other courses such as money laundering, bribery investigation, investigative interviewing, online investigators, crypto currency and demystifying cyber-crime are also now being successfully delivered as virtual courses.
6. After careful consideration the two week Specialist Fraud Investigator course aimed at PIP level 2 investigators have been suspended as the length of the course and the amount of work require to redesign the course for virtual delivery

make it impractical to deliver this remotely at present. This decision is under monthly review.

7. The situation in relation to face-to-face training will be reviewed and risk assessed as changes are made to lockdown restriction and as soon as classroom-based training can safely be delivered it will restart. Initially this is likely to be closed courses for single forces or organisations in their Covid-19 safe training units. As restrictions are eased and it is safe to do so, consideration will be given to recommencing open courses in commercial training venues.
8. The Academy has started work with Regional Organised Crime Units to carry out local training needs assessments to identify likely demand over the coming financial year. This has been successfully piloted with the eastern region.
9. In conjunction with the Government Counter Fraud Profession (GCFP) team at the Cabinet Office and Coventry University, a third of online courses for Future Learn are being developed for delivery in April based on the GCFP Fraud Risk Assessment Standard. This is part of a project funded by Lloyds Bank and is aimed at the creation of an online counter fraud qualification.

International work

10. The Academy has been carrying out a series of 12 virtual training need assessments funded by the International Anti-Corruption Coordination Centre (IACCC) with anti-corruption bodies in overseas jurisdictions regarded as posing a high risk of money laundering such as the Cayman Islands, Gibraltar and the Seychelles. This has resulted in development of training packages to be delivered virtually from March this year.
11. Similarly, the ongoing project funded by the NCA to develop economic crime investigation capacity in Ukraine has continued with virtual delivery of training using a mix of pre-recorded modules and live zoom sessions. In addition, the NCA are now funding the translation of the new fully online version of the Demystifying Cyber training course into Ukrainian for delivery to 180 delegates this year with a further 100 to 200 next financial year.
12. The Academy has continued to provide external quality assurance on behalf of the FCDO for their financial crime capability building programme in Pakistan which is now being delivered virtually.

Conclusion

13. Despite the impact of Covid-19, the Academy has continued to deliver high quality training and generate sufficient income to cover its costs. It is projected to break even this financial year.
14. The pandemic has provided the opportunity for the Academy to develop new online and blended programmes for training delivery now and in the future.

Committee: Economic Crime Committee	Date: 3 February 2021
Subject: National Lead Force (NLF) Implementation plan	Public
Report of: Assistant Commissioner Angela McLaren	For information

Summary

The purpose of this paper is to set out the proposed approach to implementation and governance of the NLF Plan and to discharge actions 9/2020/NP (a) and (e) and 6/2020/NP (d).

Considerable progress has already been achieved on reporting delivery against the success measures including establishing the baseline. This is incorporated in the quarterly performance report submitted to this Committee. Progress has also been made against some of the significant milestones within the plan. However, governance and assurance is fragmented across nearly a dozen different working groups/project boards within the Economic Crime Directorate, reporting into a range of other City of London Police governance boards.

It was agreed at the City of London Police Strategic Management Board to establish a NLF Programme Board to monitor the significant milestones, service commitments and success measures set out in the NLF plan. The Board will be led by the Assistant Commissioner Economic and Cyber Crime supported by a small professional programme team. The NLF Programme will provide a quarterly report to the Economic Crime Committee on progress against significant milestones. on a quarterly basis.

Recommendation

The Committee is asked to note this report.

MAIN REPORT

Purpose

- 1 The purpose of this paper is to set out the proposed approach to implementation and governance of the NLF Plan and to discharge actions 9/2020/NP (a) and (e) and 6/2020/NP (d).

Background

- 2 The National Lead Force Plan 2020-2022 (the NLF Plan) was approved by the City of London Police Authority in October 2020. The plan sets out how City of London Police will improve the national response to fraud in its capacity as National Lead Force (NLF). It reflects NLF's contribution and commitment to the National Fraud Policing Strategy and the National Economic Crime Centre's (NECC) five-year strategy. The NECC leads the 'whole system' to drive down the growth in fraud on behalf of the UK Government.
- 3 The NLF plan sets out five outcomes that City of London Police is seeking to achieve: -
 - Outcome 1 - The public has confidence in the Action Fraud reporting service
 - Outcome 2 - People and organisations are prevented from being victims of fraud, and victims are supported (National Fraud Policing Strategy)
 - Outcome 3 - Police resources are deployed efficiently and effectively against fraud threats (National Fraud Policing Strategy)
 - Outcome 4 - Fraudsters operating nationally are identified and offending is disrupted
 - Outcome 5 - Policing has the capability and capacity to detect, disrupt and deter perpetrators of fraud (National Fraud Policing Strategy)

Current position

- 4 When the NLF Plan was completed, it was clear that Covid-19's impact would mean that the case for additional investment in fraud by government would need to be scaled down. The postponement of the three-year spending review has brought more uncertainty.
- 5 Despite this constraint, we are determined to make progress, while recognising that some of the ambition will need to be modified. In some areas we will be more dependent on cooperation with the forces and Regional Organised Crime Units (ROCs).
- 6 The actions in the NLF Plan have their origin in a number of sources. For example, the National Fraud Policing Strategy. It also sets out our ambition to develop our services in line with observations made in the Mackey Review¹ and by HMICFRS². In respect of each outcome, the NLF Plan states our ambition in terms of 'service commitments', 'success measures' and the 'significant milestones'.
- 7 Considerable progress has already been made on reporting against the success measures within the NLF Plan including baselining. Progress has also been made on some of the significant milestones and other improvements that are not

¹ 'Review of the national lead force responsibilities of the City of London Police and the effectiveness of investigations in the UK, 2020'

² Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services, *Fraud: Time to choose – an inspection of the police response to fraud*, page 22, April 2019, available at: <https://www.justiceinspectorates.gov.uk/hmicfrs/publications/an-inspection-of-the-police-response-to-fraud/>

included in the plan (eg HMICFRS, Mackey). However, governance and assurance is fragmented. There are nearly a dozen project boards/working groups within the Economic Crime Directorate that are relevant to the NLF plan. Between them they include hundreds of workstreams and feed into numerous strategies and action plans. These include the National Fraud Policing Strategy, HMICFRS, Mackey Review, AF/NFIB improvement plans, parliamentary select committees and the Home Office Fraud Reform Programme to name a few.

Proposals

- 8 It was agreed at the City of London Police Strategic Management Board in January that a NLF Programme Board is to be established to drive the NLF Plan forward and monitor progress. A small programme support team will be created to professionalise this approach. The NLF Programme Board and its implementation plan will be led by the Assistant Commissioner, Economic and Cyber Crime.
- 9 The programme support team will design an implementation plan aligned to the five outcomes in the NLF Plan. Each outcome will have a schedule of work. Each schedule of work will include the 'significant milestones' of the NLF plan as separate workstreams with time lines, anticipated outcomes and status reports.
- 10 The programme support team will incorporate the schedules into project management software. Draft schedules are under development with a workshop in week commencing 18 January to develop these further.
- 11 Inevitably, some of the schedules will be subject to adjustments and new workstreams will emerge. These schedules will form a starting point for the programme. All future transformational improvements and development work that fall within the remit of NLF will be led by the NLF Programme Board. Any new or emerging workstreams will be approved by the Assistant Commissioner.
- 12 The only exception to this relates to the re-procurement of the AF/NFIB contract. The procurement process is already subject to its own governance arrangements in the Next Generation Project Board chaired by the Commissioner. However, many of the NLF plan's success measures are dependent on Next Generation. Consequently, Next Generation will be referenced in the schedules where it is relevant.
- 13 To ensure that the NLF implementation programme is focussed and manageable, only those workstreams that meet certain criteria should form part of it. The criteria will include:
 - New workstreams that need to be included immediately to support Outcome 1-5 of the NLF plan
 - Workstreams that have already been subject to escalation for resolution
 - Workstreams that represent critical risk (eg success is dependent on the co-operation of forces/ROCUs which cannot be guaranteed, reputation of the force is undermined)

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- Workstreams that are essential to the success of the NLF Plan
- 14 As part of the programme set up, an assurance check will be made of all previous work relevant to the NLF Plan. This includes NLF's response to:
- the Mackey Review implementation plan
 - the National Fraud Strategy implementation plan
 - HMICFRS Fraud: 'Time to Choose' action plan
- 15 Programme assurance will verify that all workstreams shown as closed can, with certainty, be considered to be complete. The outcome of this assurance will be reported back to the Economic Crime Committee. Should assurance checking reveal any incomplete workstreams these will be referred back to the NLF Programme Board for inclusion in the implementation plan if necessary. Programme assurance will form part of the responsibilities of the programme support team to reality test the progress of any workstream should it be necessary.
- 16 In an effort to streamline governance while keeping the NLF implementation programme to manageable levels, the workstreams covered in existing working groups/project boards will be reviewed. Some of these subsidiary workstreams will have such prominence that they will need to be included in the NLF Programme. Opportunities to rationalise and reduce the number of working groups/project boards will also be considered. Where it is agreed that working groups/project boards need to be retained, the programme support team will also support these groups/boards, tracking progress and helping their 'owners' with reporting cycles.
- 17 The programme board will monitor the ECD performance report which provides a dashboard of the NLF plan's service commitments and success measures.
- 18 To kick start the programme the board will meet monthly initially. Thereafter it will be scheduled at quarterly intervals to facilitate reporting to the Economic Crime Committee.

Conclusion

- 19 A programmatic approach will provide a forum for decision making on prioritisation, escalation of critical delivery risks and improved assurance of work being delivered. It will provide a single repository and overview of the transformational work and performance of NLF.

Name: Angela McLaren

Role: Assistant Commissioner Economic and Cyber Crime

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