

Committee: Economic and Cyber Crime Committee – For information	Dated: 04/11/2021
Subject: HMICFRS Fraud Inspection	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1,10, 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	NA
What is the source of Funding?	NA
Has this Funding Source been agreed with the Chamberlain’s Department?	NA
Report of: Assistant Commissioner McLaren	For Information
Report author: T/Commander Clinton Blackburn	

SUMMARY

This report provides a short update in respect to the HMICFRS inspection recommendations. Ten of the original recommendations have been satisfactorily implemented with five requiring further work and one no longer relevant. Three of the outstanding recommendations are the responsibility of COLP as NPCC Lead. As a result of this inspection revisit HMICFRS have also made a further three recommendations, one of which is the responsibility of COLP. A new work plan will be developed for each of these recommendations and monitored through the NLF Programme Board.

COLP will also work with forces to support implementation of the outstanding recommendation and areas for improvement that are the responsibility of chief constables. A letter was sent to all chief constables on the day of publication and this should also form part of wider PCC engagement who are ultimately responsible for holding their forces to account for delivery.

Recommendation(s)

It is recommended that members note the contents of this report.

MAIN REPORT

BACKGROUND

1. HMICFRS published its first thematic fraud inspection in 2019: [Fraud: Time to choose – An inspection of the police response to fraud - HMICFRS \(justiceinspectors.gov.uk\)](#). It contained 16 recommendations, a majority of which were for City of London Police as the NPCC Lead to deliver, and 5 areas for improvement for all chief constables.
2. In 2021 it conducted a revisit of the inspection focussing on how effectively the recommendations and areas for improvement have been implemented and their impact. The report was published on 5 August 2021: [A review of 'Fraud: Time to choose' - HMICFRS \(justiceinspectors.gov.uk\)](#)

CURRENT POSITION

3. The report highlights ten of the original recommendations have been satisfactorily implemented with five requiring further work and one no longer relevant. The recommendations requiring further work that are the responsibility of City of London Police as NPCC Lead are set out below. A new work plan will be developed for each of these recommendations and monitored through the NLF Programme Board.
 - a. **Recommendation 1:** By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should publish a timetable for implementing the revised Know Fraud system, making clear which services are to become available at each stage of implementation and thereby enabling forces to make use of each service as early as practicable. The use made of the system by police forces should be monitored and evaluated to identify best practice.

It was recognised that plans for the new system had changed since the recommendation was made and this had **not been implemented**. HMICFRS identified some consultation has taken place between City of London Police and interested parties regarding the development of the new system. However, their inspection revealed that some forces are unaware of the problems with the current system and the difficulties in developing a new system. Regular updates to all forces, including, where possible, predicted timescales will form part of the Next Generation Service engagement plan.

Update 04/11/2021 - *Regular updates to forces are being provided via the monthly NLF newsletter and a comms and engagement strategy will be developed in the coming months once the new resource is onboard.*

- b. **Recommendation 7:** With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime, working with the College of Policing, should take responsibility for identifying, evaluating and disseminating best practice advice on the police response to fraud.

Despite the work that had been done to improve identification and sharing of good practice, including development of the Economic Crime Knowledge Hub, regional fraud development officers and other force engagement, HMICFRS concluded this recommendation had **not been implemented**. It fell short of a structured, methodical and co-ordinated approach and there was little evidence of COLP and the College of Policing working together to implement this. Closer engagement with the College of Policing will form part of the future work plan.

Update 04/11/2021 - *Following the recent ECPB, a process is being mapped out and will be sent back to ECPB (with examples) to be ratified. This will also be sent to the COP to seek their views.*

- c. **Recommendation 10:** With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime, when issuing to police forces advice on fraud protection that is to be given to the public (including alerts and campaigns), should take responsibility for evaluating the effectiveness of how that advice is given to the public and the effectiveness of the advice.

HMICFRS found while there had been some improvements in data collected around campaigns there was still little evidence effectiveness of campaigns were being evaluated and this was assessed as **not implemented**. COLP will be working with the NECC and the Home Office to improve the evaluation of the effectiveness of fraud protection advice.

Update 04/11/2021: *The IPOSOS MoRI survey of Cyber Protect messaging has been received, which was commissioned with the HO. This was delayed due to Covid and this is currently being reviewed to establish if what PROTECT does actually changes behaviour, and what works and what doesn't.*

4. As a result of this inspection revisit HMICFRS have also made a further three recommendations.

- a. **Recommendation 4A:** By 30 September 2021, chief constables should make sure that their forces are following the guidance issued by the NPCC Coordinator for Economic Crime about fraud-related calls for service.

Update 04/11/2021: *Call for Service advice was re-issued immediately after the latest HMICFRS report. From an NLF perspective, as part of the NLF's force engagement plan, Call for Service will be an area of ongoing assessment post the Capability survey.*

- b. **Recommendation 4B:** By 31 March 2022, the NPCC Coordinator for Economic Crime with the National Crime Agency, National Economic Crime Centre and City of London Police, should set up an effective national tasking and co-ordination process for fraud.

Update 04/11/2021: This relates to the FOM (Fraud Operation Meeting) which is run by the NECC. It is agreed that processes are already in place and fully functioning in relation to the local and regional dissemination of fraud cases, which is business as usual. This has been supplemented by the LFOR week tasking meeting which enables P1/P2 cases to be escalated into NLF.

However there continue to be obstacles in relation to the allocation of National Fraud cases (including those with an international element).
*those hard to place cases.

The FIM/FOM process, was introduced to allow for timely and easy escalation of these types of cases, with the aspiration of being able to allocate to NECC partner agencies. However since the inaugural meeting on 26th May 2021, to date no referred cases have been adopted by any of the partners.

To date NFIB have made two case referrals on both occasions these have taken over 6 weeks to be returned within any apparent progress, thus negating any timely referral or escalation.

It was agreed in the FIM/FOM meeting dated 19th October 2021 this pilot has **not** met its objectives as a tasking mechanism for National fraud cases. It has not reduced time for case allocation, in fact quite the opposite with additional time being incurred before the case is returned to NFIB and tasked to dissemination to either a force or NLF. Currently there is no agreed process in relation to the adoption/transfer of risk and it remains sitting within NFIB, additionally due to this the victims of referred cases are in limbo.

It has been identified that the main causes for the FIM/FOM not achieving its current objectives are due to a number of reasons:-

- Lack of decision makers at meeting (no ability to tap in or be involved in individual organisational tasking meetings)
- Lack of process mapping (across individual organisations)
- Lack of acceptance criteria across NECC partners (in line with capacity)
- Lack of ability to prioritise Threat/Risk and Harm against current workloads/capability and capacity of all partners.

A further internal meeting held on Wednesday 20th October 2021 has agreed the following actions:-

1. To review use of APMIS across CoLP Fraud Teams and Departments
2. To baseline implementation of APMIS to establish viability/or not
3. Feedback findings back to next FIM/FOM to identify/enable next steps to address National allocation of fraud cases.

- c. **Recommendation 4C:** By 31 October 2021, chief constables should adopt the guidance issued in September 2019 by the NPCC Coordinator for Economic Crime that was aimed at improving the information given to victims when reporting fraud

Update 04/11/2021: *Victim information guidance was re-issued immediately after the latest HMICFRS report. From an NLF perspective, as part of the NLF's force engagement plan, support to victims will be an area of ongoing assessment post the Capability survey.*

CONCLUSION

4. The report identified that all outstanding recommendations are being actioned and progressed. These will continue to be monitored by the Chief Officer Team, to ensure that these are fully implemented inline with HMICFRS feedback.