

City of London Corporation Committee Report

Committee(s): FCCRASP – For decision P&R – For decision Court of Common Council – For decision	Dated: <i>Under urgency</i> 03/07/2025 26/07/2025
Subject: Fraud and Cyber Crime Reporting and Analysis Service Procurement Committee – Proposed Amendments to the Terms of Reference	Public report: For Decision
This proposal: • provides statutory duties • provides business enabling functions	
Does this proposal require extra revenue and/or capital spending?	No
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
Report author:	Raquel Pinto Town Clerk’s Department

Summary

The Fraud and Cyber Crime Analysis Service Procurement Committee (FCCRASP) was first established in April 2021, to oversee the procurement of the next generation Fraud and Cyber Crime Reporting and Analysis Service. The Committee was created as a time limited body for a period of three years (from April 2021 to April 2024) to cover the duration of the procurement of this service. Following some project delay, Members agreed in April 2024 that the lifetime of Committee should be extended “for the duration of the project from April 2021 up to and including formal ‘Go Live’ date”, as the project would not be delivered by April 2024 as originally scheduled.

At the Court of Common Council meeting in April 2025, a query was raised with regards to the membership arrangements of this Committee, particularly with regards to the time constraints of some ex-officio Members who sat on this Committee, and it was requested that this matter be investigated. This paper therefore provides Members with options on next steps, with a recommendation made as to the proposed optimal option.

Recommendation(s)

Members are asked to:

- Note the options as set out in 1-3.
- Agree to Option 2, to alter the Fraud and Cyber Crime Reporting and Analysis Service Procurement Committee's Terms of Reference to include the addition of a nominee for each Committee that is represented in the membership.

Members of the **Policy and Resources Committee** are also asked to:

- Consider whether a decision under urgency procedure is required by the Court of Common Council to enact any changes (should these be agreed) before the Fraud and Cyber Crime Analysis Committee meets on the 10th of July 2025.

Main Report

Background

1. The next generation Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) is designed to replace Action Fraud, the national fraud reporting service, which is a key component of the City of London Police's (COLP) function as National Lead Force for Fraud.
2. COLP is leading the new service procurement, but it is mainly funded by the Home Office and must follow their governance requirements. Since the project costs over £100m, it also falls under HM Treasury governance and the Infrastructure and Project Authority's (IPA) gateway process.
3. At the time of its inception, the project would have had to report to various City of London Corporation Committees and Sub-Committees due to the then-reporting requirements of the City Corporation Governance arrangements. Following discussion with the IPA and the Home Office Finance and Investment Committee regarding the necessity of streamlining these approval mechanisms, the Court agreed in April 2021 to establish the Fraud and Cyber Crime Reporting and Analysis Service Procurement Committee (FCCRASPC) as a single dedicated Committee with sole responsibility for approvals related to the project, to oversee the procurement of the next generation Fraud and Cyber Crime Reporting and Analysis Service.
4. The Committee would be time limited to a period of three years (from April 2021 to April 2024) to cover the duration of the procurement of this service and would take on the responsibilities of those Committees and Sub-Committees who would otherwise been required to oversee this project – significantly reducing the burden on Members. The composition therefore takes into account the relevant Chairs and Deputy Chairs from these committees.

Current Position

5. The procurement of the new Action Fraud Service remains underway. It was evident in early 2024, that this would not be complete by April 2024, as originally scheduled. The sunset clause on the Committee's existence therefore needed revisiting.
6. The Committee therefore proposed a change to their Terms of Reference, to extend the Committee's oversight of the procurement until such a time that the work is delivered. After the Service has 'gone live', oversight of the new Service will rest with the City of London Police Authority Board.
7. The Court of Common Council agreed to changes to the Committee's Terms of Reference in April 2024, which would enable the Committee to remain active "for the duration of the project from April 2021 up to and including formal 'Go Live' date".
8. At the Court's meeting in April 2025, a Member raised a query with regards to the membership of this committee, specifically the demands on some of the ex-officio Members and asked that consideration be given to a change to allow for ex-officio Members to nominate a representative for each of the Committee's represented in the membership of the FFCRASPC Committee.

Options

The following options are therefore available to Members:

9. Option 1 - Maintain the current Governance arrangements

Considering there are only three meetings scheduled for the remainder of 2025, Members may wish to maintain the current arrangement. The project is estimated to be wrapped up by the end of year. Once the Service has 'gone live', the continued oversight of the new Service will be transferred to the City of London Police Authority Board for oversight, after which this Committee will cease to exist.

Currently there is a provision on the Terms of Reference which states that the Committees 'may also propose additional individuals from their membership where they believe they will bring relevant expertise and experience to the Committee's deliberations (limited to one nomination per Committee and Sub-Committee). Members may therefore feel that this provides sufficient recourse to address the concerns raised without requiring any further changes.

10. Option 2 – Amend the Committee's Terms of Reference to include a 'representative' for the Committee's which are represented

Given the concerns raised by Members with regards to time constraints and inability to make the Committee, Members may wish to make a change to the Committee's Terms of Reference to allow all individuals who are automatically Members but are unable to serve, to have an option for a representative. The change would have minimal impact on the Committee and would allow for more

flexibility amongst Members, hopefully addressing the concerns that had been raised. The proposed changes can be seen at Appendix 1(**this is recommended**).

11. Option 3 – consider the potential early transfer of the project to the City of London Police Authority Board

Members may wish to consider the early transfer of the project to the City of London Police Authority Board, given that the project is due to come to an end at the end of the year.

Considering the importance of this project to the City and to the City of London Police as the National Lead Force for Fraud, it would not be recommended to alter the governance arrangements until the 'Go-Live' date.

The FCCRAS Procurement Committee was established to maintain the requirement for major Corporation projects to have appropriate oversight, while streamlining this approach to minimise the burden on Members and the programme team. Early removal of this Committee's role would run counter to the Corporation's approach with regards to oversight of major projects, as well as being contrary to agreements with and commitment to the Home Office. Therefore, given the current status of the project and given the delivery is imminent, it is not recommended to end the Committee early and transfer oversight to the Police Authority Board. Should Members agree to this option, further considerations will need to be made with a further report to follow.

Proposals

12. Members are asked to agree to Option 2, to amend the Committee's Terms of Reference to include a 'representative' for the Committee's which are represented. This option captures the concerns raised by Members whilst mitigating any risks to the governance process.

Corporate & Strategic Implications

Strategic implications – The purpose of this report to help ensure that the City Corporation has in place the best governance structures to deliver against the Corporate Plan alongside any statutory and / or charitable obligations.

Financial implications – None

Resource implications – None

Legal implications- None

Risk implications – If Members agree to option 3: if there are any further delays or complications with the delivery of the programme, the IPA will likely review the governance of the programme, which would raise questions as to why the Corporation's oversight was altered at a critical phase of delivery.

Equalities implications – All public bodies have a duty to ensure that when exercising their functions they have due regard to the need of advance equality of opportunity between people who share a protected characteristic and to take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people and encourage people with certain protected characteristics to participate in public

life or in other activities where their participation is disproportionately low. The proposals contained within this report do not have any potential negative impact on a particular group of people based on their protected characteristics.

Climate implications – The proposals included in this paper do not carry any significant implications for the Climate Action programme.

Security implications – None.

Conclusion

13. Members are therefore asked to consider all available options and agree with the recommended approach (**Option 2**) to allow the inclusion of a 'representative' to the Committee's Terms of Reference.

Appendices

- Appendix 1 – FCCRASP Court Order

Background Papers

- [Fraud and Cyber Crime Reporting Service – Governance: Court of Common Council – March 2021](#)
- [April 2024 – White Paper](#)

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