

Rt Hon Nick Hurd MP,  
Minister of State for Policing and the Fire Service  
2 Marsham Street  
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24<sup>th</sup> May 2019

Dear Nick

**SUBJECT: HMICFRS Inspection Updates Report: An Inspection of the Police response to fraud.**

I write regarding the recent inspection report on the police response to fraud.

Fraud can have a devastating impact on the health and wellbeing of victims, particularly those who can find it difficult to cope and recover from an initial incident and may become a repeat victim. The reduction in police resources added to the increasing complexity of fraud crimes leads to some worrying headlines, as illustrated within the inspection report.

Of particular concern is the lack of current capacity within the Action Fraud unit which has not been strengthened in line with the increased number of fraud reports received. It is not surprising that this has resulted in the average call wait time doubling and the average call length rising by a third over the last six years which inevitably places additional demand on call takers. Perhaps the most concerning statistic reported is rate of abandoned calls, which at the time of the inspection, stood at 37%.

If the police service is to route all fraud crimes through one national entry point (Action Fraud), there is a need to ensure that this is adequately resourced and has the capacity and capability to meet the incoming demand. If over a third of victims are abandoning calls, how can the police service confidently say that the national fraud demand is known, understood and is being met? Victims need to have confidence to report fraud crimes and I would ask the Home Office to consider the current operation and capacity of this service. Similarly, I would also ask that the current online reporting mechanism be reviewed to reduce the number of abandoned online reports and to quality check the data being submitted.

Although Greater Manchester Police (GMP) was not one of the areas visited as part of the inspection, there are a number of recommendations and areas of improvement identified for Chief Constables. I will focus specifically on these in this response.

***HMICFRS Recommendation 2 - By 31 March 2020, the National Police Chief's Council Coordinator for Economic Crime and chief constables should ensure that forces have processes in place to accurately and efficiently report fraud outcomes to the National Fraud Intelligence Bureau.***

Greater Manchester Police already has an existing mechanism to report certain outcomes to the National Fraud Intelligence Bureau (NFIB). A monthly report is generated identifying

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fraud crimes that have had a positive outcome and there is a commitment to continue this reporting to the NFIB.

***HMICFRS Recommendation 9 - By 30 September 2019, chief constables should publish their force's policy for responding to and investigating allegations of fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).***

In November 2018, a programme of work commenced to review fraud demand within GMP. A key element of this review was to design an allocation matrix that aligned to the principles of the Target Operating Model. The new model will provide GMP with a fair and consistent method for assessing and allocating fraud for investigation. It is the intention that this new model will form part of a new Fraud policy for GMP, and I am committed to see this published in the coming months.

To supplement this work, the police Independent Advisory Group have been involved in reviewing the letters that are sent to victims of fraud crime and have made recommendations on the content where appropriate. Additionally, I have asked that the new allocation matrix and findings from this inspection report are discussed with members of the Greater Manchester Independent Police Ethics Committee for consideration and comment in June.

***HMICFRS Area for Improvement 1 - Chief constables should improve the way their force uses the National Fraud Intelligence Bureau monthly victim lists to identify and support vulnerable victims and others who require additional support.***

GMP receives an average of 1,000 victims per month who have reported a fraud or cyber-crime to Action Fraud and is currently part of a Home Office project to support both vulnerable and non-vulnerable victims of these crimes. Whilst Action Fraud retain and communicate with those victims identified as non-vulnerable, those identified as vulnerable are referred into the GMP Cyber and Economic Crime Awareness Service (CECAS). This is a programme that I have funded in Greater Manchester for the last two years.

Launched in November 2017, the CECAS service prioritises vulnerable victims, but has a wider scope to assess and allocate crimes for further investigation or disruption activity. Telephone contact is made with the victim and is often followed up by a home visit and/or referral to another agency for further support. The service has also recruited police volunteers to act as Senior Scambusters to offer peer to peer support to older vulnerable victims. I have personally met with the Scambusters volunteers and am a strong advocate for the work they undertake to help prevent repeat victimisation.

***HMICFRS Area for Improvement 2 - Chief constables should ensure their forces improve the identification and mapping of organised crime groups in which the principal criminality is fraud.***

The effective mapping of organised crime groups relies on more than the data held by the police service alone. The current Organised Crime Group mapping system does not contain all of the information and intelligence required to identify fraudsters. There are a number of other public and private sector organisations such as Trading Standards, Immigration and the Banking Industry that could assist in developing credible Intelligence. I am keen that this work does not operate in isolation and so consideration will be given as to how to best engage with these partners across the North West to share data and intelligence and form a holistic picture of organised fraud crime across Greater Manchester.

In the meantime, work will continue with the Regional Organised Crime Unit and NFIB to identify more effective means of sharing partnership data that will further develop mapping processes.

***HMICFRS Area for Improvement 3 - Chief constables should ensure that fraudsters are included among those considered for serious organised crime 'prevent' tactics, including by local strategic partnership boards and through integrated offender management processes.***

In Greater Manchester the police are already working alongside our partnership led Organised Crime Coordination Unit, operating under the branding 'Challenger'. Under a Challenger Fraud model the top 10 offenders will be targeted for activity aimed to prevent and disrupt. This activity has already commenced, using crime data to identify the top 10 repeat offenders.

***HMICFRS Area for Improvement 4 - Chief constables should increase their force's use of ancillary orders against fraudsters.***

Developing a credible model for identifying and managing fraud offenders is a priority for GMP in 2019/2020. A disruption toolkit has been developed and ancillary orders will be included and form part of a full range of disruption tactics. A process will be implemented to measure the consideration and application of ancillary orders and referrals to the Regional Organised Crime Unit.

***HMICFRS Area for Improvement 5 - Chief Constables should ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.***

I can confirm that the Victims Code of Practice will be reviewed as part of the Economic Crime Unit annual audit in June 2019. The results of the audit will inform the 2019/2020 delivery plan.

As I stated at the outset of this letter, the issue of fraud is becoming more complex and I am committed to supporting the Chief Constable to provide effective services to victims and to bring offenders to justice. In addition to the Cyber and Economic Crime Awareness Service to provide enhanced support to vulnerable victims, I have also recently approved funding to support the development of a Digital Security Centre. This will look to integrate a Protect model into wider cyber innovation and business growth in Greater Manchester. The programme will aim to engage with businesses and provide packages of support to protect them from the harms of fraud and cyber-crime. This is very much a partnership approach led by GMP and I am confident that this service can be launched later this year.

Yours sincerely



**Baroness Beverley Hughes  
Deputy Mayor of Greater Manchester  
Policing, Crime and Criminal Justice**