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Mr Paul Trott Chief Executive Office Police and Crime Commissioner – Gloucestershire	Our Ref: JS-jms/Trott HMICFRS Fraud
	Email: <a href="mailto:jon.stratford@gloucestershire.police.uk">jon.stratford@gloucestershire.police.uk</a>
	Direct Dial: 01452 752331
	Date: 3 June 2019

Dear Paul

**Re: Response to the national HMICFRS report**

**Fraud: Time to Choose: An inspection of the police response to fraud**

Please find below our response to the above report aimed at assisting you to meet the requirements of Section 55(1) of the Police Act 1996. The force was not subject to this inspection; therefore we have provided an update covering force activity within the headings in the report. We have also separately addressed the recommendations and areas for improvement applicable to forces.

**Force Overview**

**Strategy- How Well designed is the Strategic Approach to Fraud**

A whole system approach (Public/Private) has been created nationally. The National Economic Crime Centre soft-launched in October 2018. This drives ROCU activity and a ROCU Fraud Liaison Officer at Detective Sergeant level has been recruited and takes up position on 6<sup>th</sup> June 2019 reporting directly to the NECC.

The National Co-ordinators Office is currently finalising the National Fraud Strategy and a bespoke Fraud Knowledge Hub has been launched to share best practice hosted by the City of London Police.

We attend the Economic Crime SGG in the region (chaired by ACC Nikki Watson). DI Usher sits on the Tactical Group that ensures a consistent approach across the region. Each DI on the tactical group has a thematic area to lead on.

**Structure- How well do current Structures help law enforcement to tackle fraud**

We have utilised the available Police Transformation funding to increase the numbers of PIP2 investigators who have received the Specialist Fraud Investigators programme hosted by the Economic Crime Academy by 8. The recent promotion process has lifted the number of Fraud trained Detective Sergeants working in investigations by five. This improves investigation planning in line with the Fraud investigation Model, identified and being best practice. All disseminations given by Action Fraud are allocated for investigation.

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We are currently developing an Economic Crime Review paper to re-shape current resources to provide a greater ability to investigate fraud with dedicated Civilian Investigators

**Protect- How well do police forces help to protect individuals and businesses from Fraud?**

Bespoke crime prevention advice notices (a total of 16 notices) have been created and available to provide to victims of fraud prior to Action Fraud Involvement.

A monthly awareness campaign has just launched and has been based on the data for most common fraud types provided by NFIB as part of the Force Fraud Profiles.

We utilise a Cyber Protect Officer Victoria Brinton to deliver messaging to businesses. She is sighted on the Action Fraud data where businesses have been victims of fraud rather than just computer dependent attacks.

**Investigation- How well do Police Forces investigate fraud and deter potential offenders?**

Rather than using the categories of Volume and Value, Harm and Impact in terms of prioritising fraud are key. Calls for Service are identified in the control room with a Vulnerability Question Set applied to Fraud reporting. An enhanced service is provided where vulnerability is highlighted.

A Volume Fraud Course was delivered to 12 Supervisors across the force to improve consistency in application of the Fraud Investigation Model.

Partnership working with other Public Sector Counter Fraud teams has been an approach that has improved the quality of investigations and subsequent convictions. Media awareness and interviews can act as a deterrent. Active engagement with media following successful Fraud Convictions always takes place (OP Escudo- NHS procurement/estates fraud), Op Forint (Car Leasing by Irish OCG), Recent Probate Fraud by Family members forging the will and OP Range (Forest of Dean- Land Rover Conspiracy)

Financial Investigators routinely work on Tier 1-4 OCG's at the request of LRO's. There is a footprint in more than 50% of mapped OCG's in Gloucestershire. Disruptions will be measured within the relevant tool by the LRO.

**Victims- To what extent does law enforcement consistently provide a high quality response to victims of fraud?**

Contrary to the report, we utilise the monthly victim lists as the basis for identifying vulnerability and the basis for Operation Signature. A vulnerability matrix is applied and if the victim meets only one of the criteria, they will receive an Op Signature response. A triage phone call in line with the best practice ECVCU (Economic Crime Victim Care Unit) is made to determine what support and in what format the support is required from the victim. There is a piece of work with Commissioning Services in terms of providing support to non-vulnerable victims of fraud.

A National Victim workshop conference was held on 2<sup>nd</sup> April 2019 to share best practice and identify areas for improvement. We sent a representative to the workshop and were able to share best practices with other Forces on our Op Signature app (a web based system).

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## Specific Recommendations and Areas for Improvement

The recommendations in the report are predominantly focused on the National Co-ordinators office to implement changes at a National Level. There are two that relate to individual forces and five suggested Areas for Improvement:

### Recommendation 2

**By 31 March 2020, the National Police Chiefs' 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.**

Detective Inspector Wayne Usher is a member of the national working group, he is helping to shape processes and practices required of forces. This will hopefully put the force in a strong position to implement any identified changes, once known.

### 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).**

A regional policy is being developed to ensure that the five South West Forces have a consistent approach.

## Areas for Improvement

**1. 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.**

Contrary to the report, we utilise the monthly victim lists as the basis for identifying vulnerability and the basis for Operation Signature. A vulnerability matrix is applied and if the victim meets only one of the criteria, they will receive an Op Signature response. A triage phone call (In line with the best practice ECVCU (Economic Crime Victim Care Unit) is made to determine what support and in what format the support is required from the victim.

**2. Ensure their forces improve the identification and mapping of organised crime groups (OCGs) in which the principal criminality is fraud.**

'Serious crime' covers 3 broad headings (threat pillars) consisting of 10 threats, with 2 further cross-cutting vulnerabilities:

#### Vulnerabilities

- Child Sexual Exploitation & Abuse (CSEA)
- Modern Slavery & Human Trafficking (MSHT)
- Organised Immigration Crime (OIC)

#### Prosperity

- Fraud & Economic crime
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- Money laundering
- Bribery & corruption
- Cyber crime

#### Commodities

- Drug trafficking
- Firearms
- Organised Acquisitive Crime (OAC)

#### Cross-cutting vulnerabilities

- UK Borders
- Prisons

OCG Mapping (OCGM) takes place following identification of an OCG through the Force's Tasking & Coordinating process. The OCGM assessment tool is used to score the threat posed and is recorded within the OCG index, where data of the group/individuals is collated.

**3. 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.**

This activity forms part of the requirements undertaken by the regional liaison officer, based in Avon and Somerset, who acts as the point of contact between forces and the National Crime Agency.

**4. Increase their force's use of ancillary orders against fraudsters.**

All relevant staff have received inputs on the tactic of ancillary orders which is a relatively new concept. Application is considered as a part of normal investigative and Court hearing processes.

**5. Ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.**

Compliance with the Code of Practice for Victims in relation to fraud falls into two main categories; where crimes are investigated compliance forms part of the requirements for the investigating officer.

Where crimes are not investigated, Operation Signature is a standardised reporting and recording process to identify and support vulnerable victims of fraud. The process provides preventative and support measures intended to protect victims and safeguard them from further targeting. An important strand of Operation Signature is its wider messaging and prevention advice, and working with statutory and voluntary agencies both locally and nationally to influence change.



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The overall aims of Operation Signature in Gloucestershire are to ensure that:

- We deliver an excellent quality of service to vulnerable victims of fraud through face to face, uniformed visits;
- Vulnerability is identified at the earliest opportunity and those requiring additional support are referred to suitable partner agencies;
- Preventative measures are identified and implemented, with an emphasis on maximising protection for the victim and reducing the risk of repeat victimisation.
- To contribute to the OPCC aim: Older but not overlooked and our Strategic Objective 7: To optimise the efficient and effective use of resources.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Jon Stratford', is located below the text 'Yours sincerely'. The signature is stylized and includes a horizontal line underneath.

**Jon Stratford**  
**Deputy Chief Constable**