



19th October 2021

### **Response to the National HMICFRS Spotlight report- A review of Fraud: Time to Choose.**

The report found [here](#) was a national report involving the inspection of eleven forces, though Gloucestershire Constabulary wasn't inspected, their website alongside the other 42 forces were. This was in regards to information relating to fraud.

I am happy with the response from the constabulary to the recommendations in the report, and I am interested to see if there is an impact on those recommendations directed at other forces.

**Chris Nelson**

Gloucestershire Police and Crime Commissioner

**Gloucestershire Constabulary**

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Mr Richard Bradley  
Chief Executive  
Office Police and Crime Commissioner –  
Gloucestershire

Our Ref: JS-jms/Bradley Spotlight report - A  
review of Fraud: Time to choose  
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Date: 7 October 2021

Dear Richard

**Re: Response to the national HMICFRS Spotlight report - A review of Fraud: Time to choose**

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 report is national report and Gloucestershire Constabulary was not one of the eleven forces inspected, however the websites for all 43 forces were reviewed for information relating to fraud.

The publication revisits the 2018 inspection and assesses progress against the recommendations and Areas for Improvement (AFIs) made in that report. HMICFRS have added three new recommendations.

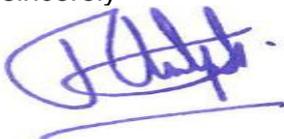
It notes that ten of sixteen recommendations have been implemented, with progress made on a further two and three still outstanding. One of the recommendations is no longer relevant. One of the AFIs has been dealt with, there has been progress on a further three, and one remains outstanding.

The Recommendations directed at other agencies do not require individual forces to implement changes at this time. However, we will monitor the outcome for any impact it may subsequently have.

You will see from the updates provided that the force already has a number of activities that address the recommendations made in the report and any necessary further activity is being undertaken as reported.

Please do not hesitate to contact me should you require any further information.

Yours sincerely



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

Att/.



## HMICFRS spotlight report a review of Fraud: Time to Choose

Recommendations				
Ref	HMICFRS	Owner	Timescale	Progress
1	<p><b>NEW - Recommendation 1</b></p> <p>By 30 September 2021, chief constables should make sure that their forces are following the guidance issued by the National Police Chiefs' Council Coordinator for Economic Crime about fraud-related calls for service.</p>	Chief Constables	30 Sept 2021	<p>The Constabulary already has a well-defined process for dealing with calls for service. Our FCR personnel have been trained by the Economic Crime Team (ECT) in recognising such incidents and on how to deal with them appropriately to meet the needs of victims. Refresher training will be provided at appropriate times, recognising staff turnover and to ensure a true understanding of the crime type and new methods being employed by fraudsters.</p> <p>The volume fraud response, the response to be taken for fraud reports which do not meet the Action Fraud / NFIB "Call for Service" criteria, has been created by the ECT and having been well publicised across the organisation is available on the Intranet. The contents of this response plan detail the actions to be considered in the immediate aftermath of a call for service to ensure that victims are appropriately safeguarded. Again, the ECT is in regular contact with Local Policing Team colleagues, who hold the responsibility for initial response, to ensure Officers recognise the importance of following the associated PROTECT plan. Following the Covid-19 period more structured training sessions are planned to cement this structured approach and will be co-ordinated by the new Fraud Protect Officer.</p>

				<p>In respect of the ensuing investigations, these will sit with the Initial Investigating Officer unless it is deemed that the investigation is too serious or complex. In these cases their Supervisor can ask the ECT to make an assessment on where the investigation best sits. This can lead to the investigation being adopted by the ECT; a Specialist Fraud Investigator being asked to take on the investigation; or it remaining with an LPT officer with guidance being provided by the ECT.</p> <p>The above processes ensure that Gloucestershire Constabulary is well placed to:</p> <ul style="list-style-type: none"> <li>• Appropriately respond to reports of fraud and adequately meet the needs of victims;</li> <li>• Identify vulnerable victims and deal with them appropriately; and</li> <li>• Efficiently refer reports of fraud to Action Fraud.</li> </ul>
2	<p><b>NEW - Recommendation 2</b> By 31 March 2022, the National Police Chiefs' Council 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.</p>	NPCC & City of London	31 Mar 2022	<p>The Constabulary will monitor this recommendation and will ensure that any agreed national recommendation / requirement is appropriately embedded into working practices.</p>
3	<p><b>NEW - Recommendation 3</b> By 31 October 2021, chief constables should adopt the guidance issued in September 2019 by the National Police Chiefs' Council Coordinator for Economic Crime that was aimed at improving the information given to victims when reporting fraud.</p>	Chief Constables	31 Oct 2021	<p>The Constabulary has undertaken a review of the information provided to victims, comparing the information given against that recommended by the National Police Chiefs' Council Coordinator.</p> <p>Initial findings are that the information that is shared could be more comprehensive and steps will be taken</p>

				<p>to ensure that all recommended information is shared with victims at the earliest opportunity and in the most appropriate way. This will be implemented prior to the deadline set. However, The ECT has already begun to ensure that FCR colleagues are fully briefed on what a fraud victim needs to be told and a joint piece of work will be undertaken to ensure that the required information is available to call operators through a pre-emptive reminder being added to the STORM system.</p> <p>Additionally, the letter sent by the Constabulary to all victims will include the required content. So this should lead to victims having this information provided to them at least twice.</p>
4	<p><b>Previous Recommendation 1</b> 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.</p>	NPCC	30 Sept 2019	<p>The HMICFRS assessment is that the recommendation has not been implemented.</p> <p>The force will monitor this recommendation for use of the services once available.</p>
5	<p><b>Previous Recommendation 2</b> 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.</p>	NPCC & CCs	31 Mar 2020	<p>The HMICFRS assessment is that the recommendation has been implemented.</p> <p>The Constabulary position has been to temporarily adopt a revised system whereby 2 X Crime Recording Staff, act as the primary contact between the Constabulary and Action Fraud (AF) / National Fraud Intelligence Bureau (NFIB). This temporary trial period has concluded and has been successful with performance in this area greatly improving and</p>

				<p>delivering a better structured approach to record and share outcomes.</p> <p>Following this successful trial the Constabulary is looking at options based on available resources balanced against areas of demand / responsibility. This role will be considered as part of a wider redistribution of resources and will in all probability not be resolved prior to the end of this calendar year. Therefore, as a temporary measure the Detective Sergeant and Fraud Protect Officer from the Economic Crime Team will take responsibility for ensuring outcomes are returned to NFIB. They will utilise the systems that are in place currently to assist in delivering these returns.</p>
6	<p><b>Previous Recommendation 3</b> By 31 August 2019, the Economic Crime Strategic Board should extend its remit to include all forms of fraud against individuals and businesses, not just serious and organised fraud.</p>	ECSB	31 Aug 2019	The HMICFRS assessment is that the recommendation has been implemented.
7	<p><b>Previous Recommendation 4</b> By 30 September 2019, the Home Office should publish information concerning its agreement with City of London Police to act as the national lead force for fraud. The published information should include (as a minimum) descriptions of:</p> <ul style="list-style-type: none"> <li>• the aims and objectives of the agreement;</li> <li>• the funding arrangement;</li> <li>• accountability and governance processes; and</li> <li>• City of London Police's performance against the agreement.</li> </ul>	HO	30 Sept 2019	The HMICFRS assessment is that the recommendation has been implemented.

8	<p><b>Previous Recommendation 5</b> The National Police Chiefs' Council (NPCC) Coordinator for Economic Crime, in consultation with the Home Office and the Director General of the National Economic Crime Centre, should develop a national policing strategy for fraud and, by 31 March 2020, secure its approval by the NPCC for adoption by all police forces. The strategy should:</p> <ul style="list-style-type: none"> <li>• make clear the roles and responsibilities of police forces and regional organised crime units;</li> <li>• define the relationship between City of London Police as the national lead force, the National Crime Agency (in particular the National Economic Crime Centre) and other relevant bodies, seeking to ensure that their respective roles and responsibilities complement each other and avoid duplication; and</li> <li>• define how fraud intelligence will be developed, disseminated and put to effective use by police forces and the National Fraud Intelligence Bureau.</li> </ul>	NPCC, HO & NECC	31 Mar 2020	The HMICFRS assessment is that the recommendation has been implemented.
9	<p><b>Previous Recommendation 6</b> 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.</p>	NPCC & CoP	2018	<p>The HMICFRS assessment is that the recommendation has not been implemented.</p> <p>The Constabulary will monitor this recommendation for use of the services once available.</p>
10	<p><b>Previous Recommendation 7</b> By 31 March 2020, the National Police Chiefs' Council Coordinator for Economic Crime should carry out an evaluation of two National Fraud Intelligence Bureau</p>	NPCC	31 Mar 2020	The HMICFRS assessment is that the recommendation has been implemented.

<p>products: monthly victim lists and six-monthly force profiles. The evaluation should include:</p> <ul style="list-style-type: none"> <li>• consulting with police forces to establish the uses to which these intelligence products are put; and</li> <li>• identifying any opportunities to improve the products' utility or reduce the burden on the National Fraud Intelligence Bureau in compiling them.</li> </ul>			
<p><b>Previous Recommendation 8</b> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces on how to:</p> <ul style="list-style-type: none"> <li>• accurately record and report on National Fraud Intelligence Bureau 'disseminations for enforcement' to ensure consistency and clarity for fraud-recording processes (the guidance should reassert the requirement in the Home Office Counting Rules for forces to provide the case number, the crime numbers, the suspect details and the outcome details for each such dissemination);</li> <li>• determine their response to National Fraud Intelligence Bureau disseminations for enforcement, ensuring consistency and clarity for victims of fraud; and</li> <li>• ensure that, when a force decides not to investigate, or not to continue an investigation, the victim is provided with a clear written explanation of the rationale for that decision.</li> </ul>	NPCC	30 Sept 2019	The HMICFRS assessment is that the recommendation has been implemented
<p><b>Previous Recommendation 9</b></p>	CC	30 Sept 2019	The HMICFRS assessment is that the recommendation has been partially implemented.

<p>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).</p>			<p>The Constabulary has published its policy and information on its public facing website.</p>
<p><b>Previous Recommendation 10</b> 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.</p>	NPCC	2018	<p>The HMICFRS assessment is that the recommendation has not been implemented.</p>
<p><b>Previous Recommendation 11</b> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces in relation to fraud-related calls for service as described in the Home Office Counting Rules. The advice should make clear to forces the circumstances in which they are expected to intervene and the circumstances in which they may refer the case direct to Action Fraud. The advice should also make clear how:</p> <ul style="list-style-type: none"> <li>• responses to reports of fraud may adequately meet the needs of victims;</li> <li>• vulnerable victims should be identified and dealt with appropriately; and</li> <li>• reports of fraud should be efficiently referred to Action Fraud.</li> </ul>	NPCC	30 Sept 2019	<p>The HMICFRS assessment is that the recommendation has been implemented – New recommendation 1 has been added.</p> <p>(Please see update to recommendation1).</p>

<p><b>Previous Recommendation 12</b> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should redesign the National Fraud Intelligence Bureau dissemination for enforcement documentation to make it easier for recipients to interpret and use.</p>	NPCC	30 Sept 2019	The HMICFRS assessment is that the recommendation has been implemented.
<p><b>Previous Recommendation 13</b> With immediate effect, the Director General of the National Crime Agency, in consultation with the National Police Chiefs' Council Coordinator for Economic Crime, should ensure that the tasking powers of the National Crime Agency are used effectively in the case of serious and organised fraud.</p>	NCA & NPCC	2018	The HMICFRS assessment is that the recommendation is no longer relevant and has been replaced by new recommendation 2.  (Please see update to recommendation 2).
<p><b>Previous Recommendation 14</b> With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should:</p> <ul style="list-style-type: none"> <li>• carry out (and subsequently evaluate) a campaign to raise the public awareness of the existence and role of Action Fraud; and</li> <li>• provide chief constables with a description of the role of Action Fraud for uploading to force websites.</li> </ul>	NPCC	2018	The HMICFRS assessment is that the recommendation has been implemented.
<p><b>Previous Recommendation 15</b> With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should take steps to remedy the absence of published performance indicators at Action Fraud. As soon as practicable, performance indicators should be set in relation to, for example, call handling waiting times and abandonment rates, online reporting and victim satisfaction levels. Thereafter, information on performance against those indicators should be published.</p>	NPCC	2018	The HMICFRS assessment is that the recommendation has been partially implemented.

	<p><b>Previous Recommendation 16</b> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should provide guidance to Action Fraud and chief constables. This is to ensure that, promptly on reporting a fraud, victims are provided with explanations of:</p> <ul style="list-style-type: none"> <li>• the role of Action Fraud;</li> <li>• the process by which their fraud report will be considered for assessment or referral to the police (or other law enforcement agency) by the National Fraud Intelligence Bureau;</li> <li>• how to obtain an update on the progress of their case;</li> <li>• how, following referral from the National Fraud Intelligence Bureau, the decision on whether and how to investigate rests with the police (or other law enforcement agency); and</li> <li>• the options open to victims of fraud to seek civil redress as an alternative (in cases where criminal investigations are not carried out or do not lead to convictions).</li> </ul>	NPCC	30 Sept 2019	The HMICFRS assessment is that the recommendation has been implemented.
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Areas for Improvement				
Ref	HMICFRS	Owner	Timescale	Progress
1	<p><b>Previous Area for improvement 1</b> To make improvements in this area, chief constables should improve the way their force uses the National Fraud Intelligence Bureau monthly victim lists to identify and support vulnerable</p>	CC	Not set	<p>The HMICFRS assessment is that the AFI has been implemented.</p> <p>Up until September 2020 Gloucestershire Constabulary would utilise the victim list information to inform Op. Signature activity. Therefore, if a victim met the requirements of a locally produced vulnerability test they would be visited and provided with safeguarding advice. Following a successful trial where CDI</p>

	victims and others who require additional support.			<p>Operatives oversaw this activity it will now be driven by the Fraud Protect Officer (FPO) as the CDI trial has come to an end. The FPO will complete a vulnerability assessment and ensure that appropriate safeguarding is given to vulnerable victims which will be recorded on UNIFI. Additionally, the ECT are co-ordinating support activity involving the NECVCU and have developed a relationship with Gloucestershire Victim Support Service to enhance the support to victims who the NECVCU have re-assessed / escalated from Level 1. Crimes will also being endorsed by the FPO with PROTECT / victim safeguarding plans. This creates an auditable record of our PROTECT activity.</p> <p>The introduction of a Fraud Protect Officer will enable the Constabulary to develop an approach where it is envisaged that increased reactive / pro-active PROTECT work will be possible. This will be achieved through improved collaborative working with other agencies that make up the Community Safety Partnerships which exist within the county.</p>
	<p><b>Previous Area for improvement 2</b> To make improvements in this area, chief constables should ensure that their force improves the identification and mapping of organised crime groups in which the principal criminality is fraud.</p>	CC	Not set	<p>The HMICFRS assessment is that the AFI has been partially implemented.</p> <p>'Serious crime' covers 3 broad headings (threat pillars) consisting of 10 threats, with 2 further cross-cutting vulnerabilities:</p> <p>Vulnerabilities</p> <ul style="list-style-type: none"> <li>• Child Sexual Exploitation &amp; Abuse (CSEA)</li> <li>• Modern Slavery &amp; Human Trafficking (MSHT)</li> <li>• Organised Immigration Crime (OIC)</li> </ul> <p>Prosperity</p> <ul style="list-style-type: none"> <li>• Fraud &amp; Economic crime</li> <li>• Money laundering</li> <li>• Bribery &amp; corruption</li> <li>• Cyber crime</li> </ul> <p>Commodities</p> <ul style="list-style-type: none"> <li>• Drug trafficking</li> <li>• Firearms</li> <li>• Organised Acquisitive Crime (OAC)</li> </ul>

				<p>Cross-cutting vulnerabilities</p> <ul style="list-style-type: none"> <li>• UK Borders</li> <li>• Prisons</li> </ul> <p>OCG Mapping (OCGM) takes place following identification of an OCG through the Force's Tasking &amp; 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.</p>
	<p><b>Previous Area for improvement 3</b> To make improvements in this area, 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.</p>	CC	Not set	<p>The HMICFRS assessment is that the AFI the AFI has been partially implemented.</p> <p>This activity forms part of the requirements undertaken by the NFIB Regional development Officer supported by the Regional Fraud Protect Coordinator, who act as the point of contact between forces and the National Crime Agency. The Fraud Protect Officer will be working closely with regional colleagues to determine prevent tactics and share best practice across the region to ensure that these requirements are met.</p>
	<p><b>Previous Area for improvement 4</b> To make improvements in this area, chief constables should increase their force's use of ancillary orders against fraudsters.</p>	CC	Not set	<p>The HMICFRS assessment is that the AFI has been partially implemented.</p> <p>Since mid-2020 the Economic Crime Team has asked that the Accredited Fraud Investigators (FI) work more pro-actively in developing an understanding of fraud and money laundering crime trends. This increased monitoring sat alongside individuals that come to notice as a result of investigations by other departments has led to increased use of Cash Seizures and the utilisation of Account Freezing Orders for the first time.</p> <p>The Criminal Finances Act 2017 introduced Account Freezing Orders (AFO) as a tactic for counter-fraud law enforcement teams. This tactic had not been utilised in Gloucestershire prior to 2020.</p> <p>Gloucestershire now have 3 AFI's who are NCA accredited to conduct AFOs. These AFI's has been active in obtaining AFOs throughout 2020 and 2021.</p>

				<p>In the 12 months December 2018-December 2019, Gloucestershire FIU achieved 9 POCA orders relating to economic crime (fraud &amp; money laundering), to the total value of £64,088.</p> <p>In the 12 months December 2019 – December 2020, Gloucestershire FIU achieved 13 POCA orders relating to economic crime, to the total value of £294,960.</p> <p>Therefore the FIU have increased both the number of ancillary orders obtained against those involved in fraud and economic crime, and the total value of funds recovered. This is particularly praiseworthy in light of the substantial court closures during 2020. This trend of increased activity has continued into 2021.</p> <p>High risk Suspicious Activity Reports (SARs) are processed by the Force Intelligence Bureau. These intelligence professionals are better placed to pull together relevant intelligence and task an appropriate investigatory resource from across the organisation. Consequently, it is expected that the system will become more streamlined and that any intervention will be timelier. As responsibility for fast-track SARs has been removed from the ECT it has allowed more time to consider consent SARs and the wider bank of SARs received.</p>
	<p><b>Previous Area for improvement 5</b> To make improvements in this area, chief constables should ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.</p> <p>Our previous inspection found that not all forces adhered to the <i>Code of Practice for Victims of Crime</i>. More commonly referred to as the ‘Victims’ Code’, this sets out the rights that victims of crime are entitled to. We noted that in cases of fraud involving</p>	CC	Not set	<p>The HMICFRS assessment is that the AFI has not been implemented.</p> <p>Recent changes made to the UNIFI system remind investigators of their responsibilities in respect of the VCoP. Additionally, the 4 Fraud Police Staff Investigators have received training in the requirements of the VCoP and regular supervisory reviews of investigations ensure both compliance in victim contact and that a proper needs assessment has been completed.</p> <p>The dedicated Fraud Police Staff Investigators are the first dedicated economic crime investigative resource that the Constabulary has had for over a decade. Consequently, the Constabulary is better placed to ensure that all victims of fraud are provided with the level of support they deserve and that lines of communications with our victims in the very least meet the requirements as set out in the VCoP.</p>

	multiple victims, compliance with the Code was difficult. We also found considerable delays. Some victims waited months before being told what would happen with their case.			
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Ends/.