



# Policy and Procedure - Responding to and Investigating Allegations of Fraud

<b>Reference No.</b>	P020
----------------------	------

<b>Implementation date</b>	21.12.20
<b>Version Number</b>	V1.0

Policy/Procedure	Government Security Classification	Handling Instructions
POLICY	OFFICIAL	Suitable for Public Publication
PROCEDURE	OFFICIAL	Suitable for Public Publication

Linked documents	
Reference No:	Name
Appendix "A"	NPCC NATIONAL FRAUD POLICING STRATEGY 2019 2022

**PRINTED VERSIONS SHOULD NOT BE RELIED UPON. THE MOST UP TO DATE VERSION CAN BE FOUND ON SHAREPOINT IN THE FORCE DOCUMENT LIBRARY**

# Table of Contents

## Contents

<b>1. Policy Section</b>	<b>3</b>
1.1 Statement of Intent – Aim and Rationale	3
1.2 Police Mission	3
1.3 People, Confidence and Equality	3
1.4 GDPR Compliance Statement	4
<b>2. Standards</b>	<b>4</b>
2.1 Equality Impact Assessment	4
2.2 Any Other Standards	4
2.3 Consultation	4
2.4 Monitoring / Feedback	4
<b>3. Procedure Section</b>	<b>5</b>
3.1 Fraud Reporting Process	6
3.1.1 Dorset Police Process	6
3.2 Vulnerability	7
3.2.1 The Banking Protocol	8
3.3 Electoral Fraud	8
3.3.1 Cyber Prevent and Protect Officer	8
<b>4. Authorisation</b>	<b>10</b>
4.1 Authorisation of this Version	10
<b>5. Version Control</b>	<b>10</b>
5.1 Review	10
5.2 Version History	10
5.3 Related Forms	10
5.4 Document History	10

## **1. Policy Section**

### **1.1 Statement of Intent – Aim and Rationale**

This policy document sets out a high level summary of the response by Dorset Police to allegations of fraud in line with national policy, reporting arrangements and best practice.

### **1.2 Police Mission**

Our **Mission** for policing is:

To make communities safer by upholding the law fairly and firmly; preventing crime and antisocial behaviour; keeping the peace; protecting and reassuring communities; investigating crime and bringing offenders to justice. This mission is set nationally and adopted locally by Dorset Police.

#### **Code of Ethics**

The Code of Ethics underpins every day policy, procedures, decisions and actions in policing today. The Code of Ethics is an everyday business consideration. This document has been developed with the Code of Ethics at the heart ensuring consideration of the nine Policing Principles and the ten Standards of Professional Behaviour. Monitoring is carried out through the Equality Impact Assessment process which has been designed to specifically include the Code of Ethics.

#### **National Decision Model**

The National Decision Model (NDM) is the primary decision-making model used in Dorset Police. The NDM is inherently flexible and is applied to the development and review of all policy, procedure, strategy, projects, plans or guidance. Understanding, using and measuring the NDM ensures that we are able to make ethical (see Code of Ethics), proportionate and defensible decisions in relation to policy, procedure, strategy, projects, plans or guidance.

### **1.3 People, Confidence and Equality**

Throughout history policing has been most effective when the community and the police work together, helping each other to reduce crime and fear of crime. Our priorities have been based on today's risks and from what our communities have told us are areas of concern.

This document seeks to achieve the priority of increasing the public satisfaction in the delivery of policing in Dorset.

This document also recognises that some people will be part of many communities defined by different characteristics. It is probable that all people share common needs and expectations whilst at the same time everyone is different.

Consultation and engagement has identified a common need and expectation for communities in Dorset to be:

- Listened to
- Have their needs understood
- Have their expectations met where possible
- Be kept informed

## **1.4 GDPR Compliance Statement**

Dorset Police is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. Our policies and procedures have been developed taking into account the principles of the General Data Protection Regulations (GDPR).

## **2. Standards**

In April 2019 Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) published Fraud: Time to Choose. An inspection of the police response to fraud. Dorset Police were one of a number of forces who were inspected. The publication produced a number recommendations which included that Chief Constables should publish their Force Policy for responding to and investigating allegations of fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).

### **2.1 Equality Impact Assessment**

During the creation of this document, this business area is subject to an Equality Impact Assessment (EIA). Its aim is to establish the impact of the business area on all people and to also ensure that it complies with the requirements imposed by a range of legislation.

### **2.2 Any Other Standards**

In 2018 HMICFRS conducted a thematic review of the police response to fraud, and in April 2019 published the results of that review in a document called "Fraud: A Time to Choose". This set out a number of recommendations for improvement, and Dorset Police are working with regional and national partners to implement these recommendations.

### **2.3 Consultation**

Full consultation is undertaken for new policy, full version changes and the equality impact assessment screening deems necessary.

Consultees are identified as those business areas that are affected by, subject to or have a vested interest in the policy.

Full details of consultation including feedback and changes made as a result are recorded on a separate document, the Consultation Template and retained for audit purposes.

### **2.4 Monitoring / Feedback**

Feedback relating to this policy can be made in writing to:

Address: Dorset Police Economic Crime Unit

Bournemouth Police Station, 5 Madeira Road, Bournemouth, Dorset, BH1 1QQ

E-mail: [Enquiries@Dorset.PNN.Police.uk](mailto:Enquiries@Dorset.PNN.Police.uk)

### **3. Procedure Section**

#### **Background**

Fraud remains a fast growing problem. The Annual Fraud Indicator estimated that Fraud costs the UK £190bn a year, which is equivalent to about 10% of GDP.

The Crime Survey of England and Wales estimates that there were 3.9 million incidents of fraud in the year to March 2019. This is a 15% increase over the previous year. Fraud is the largest stand-alone crime type.

In the year to March 2019, 741,123 fraud crimes were reported nationally, and 5,943 fraud crimes were reported by Dorset residents.

HMICFRS conducted a thematic review in 2018 of the police response to fraud, and in April 2019 published the results of that review in a document called "Fraud: A Time to Choose". This set out a number of recommendations for improvement, and Dorset Police are working with regional and national partners to implement these recommendations. The National Economic Crime Centre (NECC) has now also been established which is a multi-agency group designed to deliver a step change in the national response to tackling economic crime, bringing together law enforcement agencies, government departments, regulatory bodies and the private sector. The intention is to combine operational capabilities, data and intelligence to target the highest impact threats.

In line with the NPCC National Police Fraud Strategy (2019-2022) details within Appendix "A" the Home Office has called for an uplift in the investigation of fraud by law enforcement in the United Kingdom. Project Otello is the step up in the national response to fraud that is being led by the National Economic Crime Centre over a 12 month period during 2020.

Dorset Police are working closely with colleagues within the South West Region and the City of London Police to develop a consistent regional approach to tackling fraud. This approach is defined under the headings of the 4Ps.

The 4Ps – Pursue, Prevent, Protect and Prepare

**PURSUE** –we are working to create collaborative public and partnership working with other agencies to tackle fraud. We are working to better understand fraud at the local and regional level, and to improve the disruption of fraud offences.

**PREVENT** – we are working to create a joined up approach between forces, to design a comprehensive response to those vulnerable to the risk of fraud.

**PROTECT** – we are working to ensure there is effective communication across a range of channels to better protect those at risk of becoming victims of fraud, and to achieve a better response to individuals identified as vulnerable.

**PREPARE** – we are working with national and regional partners to better understand the threat posed by fraud, and to identify new opportunities to tackle the threat. We are providing training to officers and staff to ensure they have the skills they need to identify and investigate emerging fraud trends.

## **3.1 Fraud Reporting Process**

### **Action Fraud**

With the exception of circumstances which are a “call for service” which is defined below Action Fraud is the UK’s national reporting centre for fraud and cybercrime where you should report fraud if you have been scammed, defrauded or experienced cyber-crime in England, Wales and Northern Ireland. Action Fraud provides a central point of contact for information about fraud and financially motivated internet crime.

The service is run by the City of London Police working alongside the National Fraud Intelligence Bureau (NFIB) who are responsible for assessment of the reports and to ensure that fraud reports reach the right place. The City of London Police are the national policing lead for economic crime.

You can report fraud or cyber-crime using the online reporting service at any time of the day or night; the service enables you to both report a fraud and find help and support.

Action Fraud also provide help and advice over the phone through the Action Fraud contact centre. You can talk to their fraud and cybercrime specialists by calling 0300 123 2040.

When you report to Action Fraud you will receive a police crime reference number. The reports taken are passed to the National Fraud Intelligence Bureau. Action Fraud does not investigate the cases reported and cannot advise you on the progress of a case.

Where it is assessed that there is sufficient evidence to commence an investigation, the National Fraud Intelligence Bureau will determine which police force should investigate, and will allocate the case to that force. Each force will have their own policy as to which cases they decide to progress.

### **Calls for Service**

A “call for service” is a fraud report that requires the same local policing response as other crime types, and will include:

- Offences where offenders are arrested by the police;
- Where there is a call for service to the police and the offender is committing or has recently committed (at the time of the call for service) all fraud types;
- Where there is a local suspect.

### **Jurisdiction and Allocation**

Where an offender is identified as residing outside of Dorset, the crime will be transferred to the force area where the offender resides. Where an offender is identified as residing in Dorset, fraud cases will be allocated to Dorset Police for consideration of investigation. Fraud cases may also be allocated to Dorset where the victim is identified as vulnerable or in need of additional support.

#### **3.1.1 Dorset Police Process**

##### **Initial Response**

## **GSC - Official**

### **Handling Instructions: Suitable for Public Publication**

All calls to Dorset Police will be triaged by the Force Command Centre (FCC) to establish whether they are a “call for service” and to establish whether the victim is vulnerable or in need of additional support. Calls from callers that do not amount to a “call for service” will be referred to Action Fraud. Calls that are “calls for service” will either receive an immediate response or be allocated for further enquiries by the Fraud Triage Team.

#### **Fraud Triage Team**

The Fraud Triage Team is a small team of specialist fraud investigators who review every fraud reported to Dorset Police. Every fraud case is assessed to establish whether there are safeguarding needs, whether the victim is vulnerable and whether there are any viable lines of enquiry. Where a safeguarding need or vulnerable victim is identified, they will task local officers to attend. Where there are viable lines of enquiry and an investigation is considered appropriate, the case will be allocated to an investigative department. The department to which it is allocated will depend on the seriousness of the case. This could include Territorial Policing, Criminal Investigation Department, or the specialist Fraud Unit. Where a case is outside the scope of Dorset Police, either due to the scale or seriousness, referrals can be made to the regional Fraud Team or through the national referral mechanism to the City of London as National Lead Force for Fraud, or to partner agencies.

In making the decision whether or not to investigate an allegation of fraud, a number of factors will be considered by the Fraud Triage Team, including the nature of the offence, the resources available, the assessed solvability and likely success of the investigation, the vulnerability of the victim, the impact of the crime and the appropriate agency primacy.

The College of Policing Authorised Professional Practice (APP) - Fraud Investigation Model has enabled Dorset Police to train staff across the force as Specialist Fraud Investigators. This training embeds the principles of the Fraud Investigation Model, national best practice for a robust and proportionate response to the threat posed by fraud. Given the scale and nature of the threat it is not possible to investigate every case, so a new approach is required that offers alternative outcomes to prosecution, including disruption, referral to partner agencies, regulatory action and civil alternatives. The Fraud Investigation Model integrates this approach with the need to disrupt criminal activity and minimise risk at an early stage.

### **3.2 Vulnerability**

The College of Policing have provided the following definition of vulnerability ‘A person is vulnerable if, as a result of their situation or circumstances, they are unable to take care of, or protect themselves or others from harm or exploitation.’

Dorset Police have adopted Operation Signature, a model for managing vulnerable victims of fraud, and identified as national best practice. Where a victim is identified as vulnerable, local officers will be tasked to visit the victim to conduct a risk assessment. A range of safeguarding measures are available to manage the level of risk identified in each case. In the most serious cases, multiple safeguarding visits will take place until the level of risk has been sufficiently mitigated. Safeguarding will often involve working with local partner agencies to ensure the victim receives the support they require.

Operation Signature is a process to identify and support vulnerable victims of fraud. It focuses on the protection of the elderly and vulnerable members of our communities, through awareness and prevention. Fraud is frequently a hidden and underreported crime with victims often being in

## **GSC - Official**

### **Handling Instructions: Suitable for Public Publication**

denial or unaware of how to report having been a victim. The nature of fraud victimisation is not only financial. The emotional impact is significant and may include guilt, misplaced trust and diminished confidence, resulting in detrimental effects on physical and mental health and increased social isolation.

#### **3.2.1 The Banking Protocol**

The 'Banking Protocol' is just one of many ways in which Dorset Police together with other police forces across the UK are working in collaboration with the banking sector to seek to protect people from fraud.

The Banking Protocol is a partnership between the police and the banking sector to prevent customers falling victim to fraud. The Protocol asks bank staff to recognise when a customer is requesting a cash withdrawal or bank transfer which appears to be out of character with normal activity and it provides staff the confidence to ask a number of questions to gauge if the customer is making the withdrawal or transfer as a result of fraud.

The Banking Protocol encourages bank staff to have the confidence to call police, via 999 and to quote the 'Banking Protocol'.

Figures published by UK Finance Limited in January 2020 highlight the prevention achieved:

- £100 million of fraud has been stopped through the Banking Protocol rapid response scheme since its launch in 2016.
- 16,462 emergency calls have now been made through the industry-wide scheme, preventing an average of £6,077 per call.
- 664 arrests have been made since national rollout.

For Dorset the total 'Banking Protocol' prevented loss in the year 2019 was £937,254 this is an increase in prevented losses of £437,960 compared to the 2018 prevented losses of £499,294

### **3.3 Electoral Fraud**

Allegations of electoral fraud will be treated as a 'call for service' and will be reviewed and initially assessed by a trained election fraud SPOC within the Economic Crime Unit. Any investigations are conducted whilst working closely with the Electoral Commission. Careful consideration is given in respect of the likely community impact and media interest.

#### **3.3.1 Cyber Prevent and Protect Officer**

Dorset Police have a dedicated Cyber Prevent and Protect Officer who can be contacted via the below social media links:





**Free prevention materials to download:**

Take Five toolkit <https://takefive-stopfraud.org.uk/toolkit/>

Think Jessica (crime prevention website and materials):  
<https://www.thinkjessica.com/education-is-protection/>

The little book of big scams:  
<https://www.met.police.uk/SysSiteAssets/media/downloads/central/advice/fraud/met/the-little-book-of-big-scams.pdf>

## 4. Authorisation

### 4.1 Authorisation of this version

Version No: 1.0	Name	Signature	Date
Prepared:	DI 650	DI 650	14/02/2020
Authorised:	Supt - CCJ		30/03/2020
Quality Assured:	Legitimacy Team Manager		21/12/2020

## 5. Version Control

### 5.1 Review

Date of next scheduled review	1 YEAR FROM PUBLICATION
-------------------------------	-------------------------

### 5.2 Version History

Version	Date	Reason for Change	Created / Amended by
1.0	14/02/2020	Initial Document	DI 650
1.0	21/12/2020	Amendments made following consultation feedback. Please refer to rationale from Legitimacy Team for specific details.	Legitimacy Team

### 5.3 Related Forms

Force Ref. No.	Title / Name	Version No.	Review Date

### 5.4 Document History

Present Portfolio Holder	ECU
Present Document Owner	ECU
Present Owning Department	C&CJ – Director of Investigations – Strategic Fraud Lead.
<b>Details only required for version 1.0 and any major amendment ie 2.0 or 3.0:</b>	
Name of Board:	
Date Approved:	
Chief Officer Approving:	

**Appendix A**

[NPCC - National Fraud Policing Strategy 2019 - 2022](#)