



Creating a safer  
**Cambridgeshire**

## **Fraud Investigation Policy**

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## **1. Policy Aim**

1.1 The aim of this policy is to outline Cambridgeshire Constabulary's position when responding to and investigating allegations of fraud in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement. This is in response to the HMICFRS report '*Fraud: Time to choose*', an inspection of the police response to fraud on 2<sup>nd</sup> April 2019.

## **2. Background**

2.1 The policing model for fraud includes national, regional and local capabilities. National capabilities exist within City of London Police as the national lead force for fraud. This includes national police leadership and coordination, national fraud and cyber reporting (Action Fraud), national intelligence and crime dissemination (National Fraud Intelligence Bureau). City of London Police is part of the multi-agency national economic crime centre, which is responsible for leading the national law enforcement response to serious and organised economic crime.

2.2 Regional and Organised Crime Units (ROCU) have some fraud investigation capability (Regional fraud teams) within Regional Assets Recovery Teams (RART). Capacity within these teams is extremely limited as these were primarily created to undertake fraud elements of other serious and organised crime investigations.

2.3 The majority of the fraud response is delivered locally through specialist and volume crime capabilities, in particular in respect of Pursue and Protect including supporting victims.

2.4 The National Fraud Policing Strategy 2019 – 2022<sup>1</sup> requires fraud capabilities from a national to local level, covering both volume and serious and organised fraud across the 4P's framework (Pursue, Protect/Prevent/Prepare) to deliver against the National Police Chiefs Council (NPCC) fraud operating model.<sup>2</sup> This is in order to;

- Understand local threat and demand picture
- Fulfil intelligence requirements
- Manage and record calls for service
- Support locally based victims
- Implement and share good practice and operational learning
- Contribute to regional intelligence grid

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<sup>1</sup> Appendix A

<sup>2</sup> Appendix B

### **3 Applicability**

#### **3.1 Inclusions**

This policy and associated procedure applies to police officers and police staff across Cambridgeshire, in particular

- Demand Hub operators
- Front office enquiry staff
- Front line response officers
- Investigations Management Unit (IMU)
- Supervisors
- Intelligence and Specialist Crime Department.

#### **3.2 Exclusions**

There are no exclusions.

### **4 The Policy**

#### **Responsibilities**

##### **4.1 Initial Responder**

4.1.1 In line with national Action Fraud guidance<sup>3</sup>, the victim should be directed to contact Action Fraud (AF) via the website [www.actionfraud.police.uk](http://www.actionfraud.police.uk) or by telephoning 0300 123 2040. Victims can report online 24/7 and specialist advisors are available on web chat and by phone Monday – Friday 9am to 6pm.

4.1.2 There are, however, some exceptions;

4.1.3 If they are a business, charity or other organisation which is currently suffering a live cyber-attack (in progress), recommend that they call 0300 123 2040 immediately. This service is available 24 hours a day, 7 days a week. Advisors are also available 24/7 on a web chat.

4.1.4 If the fraud amounts to one of the following then the Force must record the crime on their own crime recording systems and investigate it as per local investigation policies;

- Making or supplying articles for use in fraud
- Possess/control article(s) for use in fraud
- Possession of false documents
- Making off without payment (including all forms of bilking)
- Theft of fuel
- Forgery or use of drug prescription
- Forgery etc, associated with vehicle or driver records
- Other forgery
- All POCA crimes
- Cash seizures/confiscations

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<sup>3</sup> Appendix C

4.1.5 The person reporting the fraud requires a 'call for service'. This 'call for service' would be required in the following circumstances;

- An offender has been arrested for a fraud offence, or
- The offender is committing, or has recently committed, a fraud offence, at the time of the 'call to service' to police
- The suspect is known and police can/could locate the suspect with the details provided, or, have sufficient details to apprehend an offender
- There is likely to be a loss of evidence
- The victim is 'vulnerable'

It is likely that Police will receive reports relating to a variety of fraud related subjects and the following guidance should be applied in those circumstances;

## 4.2 **Action Fraud**

4.2.1 For those reports suitable for reference to Action Fraud, once assessed by them, they will disseminate to National Fraud Intelligence Bureau (NFIB) who will assess them for investigative opportunities. They will then either send them to a specific force for immediate investigation or add the victim and crime details to a spreadsheet which is sent to individual forces on a monthly basis.

## 4.3 **National Fraud Intelligence Bureau (NFIB)**

4.3.1 For those reports disseminated by the NFIB for immediate investigation; the Investigations Management Unit will triage the report and allocate to the appropriate investigation team, as per the attached flowchart. <sup>4</sup>

4.3.2 For those reports disseminated by the NFIB on a monthly basis, the Intelligence and Specialist Crime Team Detective Sergeant will triage the report and allocate to the appropriate investigation team.

## 4.4 **Fraud Escalation Process**

4.4.1 New processes have been implemented to enable an escalation of serious and complex fraud investigations between local, regional and national capabilities. <sup>5</sup> Through its new intelligence capabilities, the National Fraud Intelligence Bureau will provide improved support to forces to link crime series and information post dissemination. <sup>6</sup>

4.4.2 The National Fraud Intelligence Bureau will monitor the take up of serious and complex crime dissemination by forces. The high priority grid developed by the National Economic Crime Centre will be rolled out to wider policing to track high priority fraud investigations. Regional fraud development officers will play a key role in this process.

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<sup>4</sup> Appendix E

<sup>5</sup> Appendix D

<sup>6</sup> Appendix G

#### 4.5 **Force Specialist Crime Team (SCT)**

- 4.5.1 SCT consist of designated fraud and cyber staff with responsibility for managing serious and complex fraud investigations. Due to the complex nature of these investigations, the Fraud Investigations Model (FIM)<sup>7</sup> is utilised as opposed to a standard Investigation Action Plan (IAP). The FIM focuses on early disruption and involvement of partner, preventing exploitation of further victims and reducing financial loss.

### 5 **Associated Documentation-**

#### 5.1 **Strategy/ Plan**

- National Fraud Policing Strategy 2019 – 2022 (Draft) – Appendix A

*Latest Draft available from City of London Police*

#### 5.2 **Policies**

- None

#### 5.3 **Procedures** (*Various appendices apply*)

- NPCC Fraud Operating Model – Appendix B
- Action Fraud Guide for Control Rooms – Appendix C
- Fraud Escalation Process – Appendix D
- Flow Chart for Investigation Management – Appendix E
- Fraud Investigation Model – Appendix F

#### 5.4 **Forms (National/ Local)**

- Referral Form Fraud Escalation (ROCTA) – Appendix G

### 6 **Who to contact about this Policy.**

6.1 Director of Intelligence, Intelligence and Specialist Crime Department

6.1.1 Detective Chief Inspector / Detective Inspector /Detective Sergeant, Specialist Crime Team

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<sup>7</sup> Appendix F

## 7. Equality Impact Assessment

Name of Sponsor	Director of Intelligence, Intelligence and Specialist Crime Department
Name of Author	Director Superintendent Becky Tipping
Description of proposal being analysed	Fraud Investigation Policy
Date EIA started	06/08/2019
Date EIA finished	06/08/2019
<p>This Equality Impact Assessment is being undertaken as a result of:</p> <p><i>Delete as appropriate</i></p> <ul style="list-style-type: none"> <li>• A new or updated policy or procedure.</li> </ul>	

### STEP 1 – Relevance

The general duty is set out in section 149 of the Equality Act 2010. In summary, those subject to the Equality Duty must have **DUE REGARD** to the need to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups.

Authors have a statutory requirement to have **DUE REGARD** to the relevant protected characteristics shown below, whilst taking a common sense approach

- age
- disability
- gender reassignment
- marriage & civil partnership\*
- pregnancy and maternity
- race

- religion or belief
- sex
- sexual orientation

\*marriage and civil partnership – the analysis applies only to the elimination of unlawful discrimination, harassment and victimisation.

Section 23 of the Equality Act 2006 allows the Equality and Human Rights Commission (EHRC) to enter into a formal agreement with an organisation if it believes the organisation has committed an unlawful act.

Under section 31 of the Equality Act 2006, the EHRC can carry out a formal assessment to establish to what extent, or the manner, in which a public authority has complied with the duty.

Additional guidance can be found by accessing the EHRC website:

<http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

Does this proposal have a direct impact on people who:	a) are any part of the Police workforce (including volunteers)?	YES
	b) reside in any part of England and Wales	YES
If <b>NO</b> to both questions	<i>Explain why and give rational</i>	No Further Action and Return to Sponsor for Authorisation
If <b>Yes</b> to either question	Continue through to Step 2	

## STEP 2 – Consultation / Engagement

You should engage with those people who have an interest in how you carry out your work generally, or in a particular proposal. This may include former, current and potential service users, staff, staff equality groups, trade unions, equality organisations and the wider community. In deciding who to engage, you should consider the nature of the proposal and the groups who are most likely to be affected by it.

The proposal owner (Sponsor/Author) must be satisfied that consultation / engagement will take place with the relevant business lead and stakeholders.

This **MUST** include engagement with the following relevant groups:

Equality and Diversity Specialist  
 Staff Associations  
 Staff Support Groups  
 Relevant community groups and members of the public

In addition, consider who else should you consult with internally and externally?

## Who might be affected?

Does what you are considering further the aims of the general duty, to

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups.

Identify the risks and benefits where applicable, according to the different characteristics.

	Positive Impact or Benefits	Negative Impact or Risks
<b>Age</b> ( <i>Consider elderly or young people</i> )	There are no obvious considerations	There are no obvious considerations
<b>Disability Groups</b> ( <i>Consider physical, sensory, cognitive, mental health issues or learning difficulties</i> )	There are no obvious considerations	There are no obvious considerations
<b>Gender Reassignment</b> ( <i>Consider transgender, Transsexual, Intersex</i> )	There are no obvious considerations	There are no obvious considerations
<b>Marriage &amp; Civil Partnership</b>	There are no obvious considerations	There are no obvious considerations
<b>Pregnancy and Maternity</b>	There are no obvious considerations	There are no obvious considerations
<b>Race and Ethnic origin</b> – includes gypsies and travellers. ( <i>Consider language and cultural factors</i> )	There are no obvious considerations	There are no obvious considerations
<b>Religious / Faith groups or Philosophical belief</b> ( <i>Consider practices of worship, religious or cultural observance including non belief</i> )	There are no obvious considerations	There are no obvious considerations
<b>Sex</b> ( <i>Male, Female</i> )	There are no obvious considerations	There are no obvious considerations
<b>Sexual orientation</b> ( <i>Consider known or perceived orientation, lesbian, gay or bisexual</i> )	There are no obvious considerations	There are no obvious considerations

	Positive Impact or Benefits	Negative Impact or Risks
Have you considered how this decision might affect work life	Yes and there are no obvious considerations	Yes and there are no obvious considerations

balance? (Consider caring issues re: childcare & disability, safeguarding issues, environmental issues, socio economic disadvantage, and low income families.)		
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### STEP 3 – Assessment

Complete the EIA by analysing the effect of your proposal and detail the outcomes.

What were the main findings from any consultation carried out?

What feedback has been received?

Using the information you have gathered and consultation that you have undertaken answer the following questions. This will help you to understand the effect on equality your proposal might have.	
Has the feedback indicated any problems that need to be addressed?	No
Describe and evidence any part of the proposal which could discriminate	N/A
Can the adverse impact identified be justified as being appropriate and necessary? If so, state what the business case is:	N/A
Where impact and feedback identified, what, if anything can be done?	N/A
What outcome will be achieved that demonstrates a positive impact on people?	The aim of this policy is to provide clear guidance to staff when responding to and investigating allegations of fraud in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement to avoid ambiguity.

### STEP 4 - Monitoring and Review

**Equality analysis is an ongoing process that does not end once a document has been produced.**

What monitoring mechanisms do you have in place to assess the actual impact of your proposal?	This policy and procedure will be monitored for compliance when the first review takes place, or if national draft guidance changes.
<b>Review Date:</b> First review must be no later than one year.	This will be reviewed and updated by Director of Intelligence no later than 06/08/2020.

## STEP 5 - Sign Off

Once the Equality Impact Assessment is complete it should be signed off by the Proposal Sponsor.

This sign off is confirmation that the analysis is accurate, proportionate and relevant and actions will be delivered as required.

Approved by Senior Officer / Proposal lead

Consultation with local and regional leads has been completed, including the ERSOU regional fraud co-ordinator.

Date: 06 August 2019

Name: Detective Superintendent Becky Tipping.