



Fraud Response, Recording, Allocation and Investigation Procedure

This procedure is part of North Yorkshire Police policy to which all Chief Constable personnel and the functions provided by the Deputy Mayor for Policing as part of the York & North Yorkshire Combined Authority are required to adhere.

Procedure Statement

This document outlines North Yorkshire Police's procedure for recording, allocating and investigating fraud offences. The procedure will ensure the most appropriate outcome is reached and keeps the victim the focus of what we do.

The procedures within aim to:

- Be victim focused, ensuring compliance with the Victims Code of Practice
- Ensure APP and National Lead Force best practice is adopted and followed
- Utilise the Fraud Investigation Model which places the priority on the effective and timely removal of the threat and the protection of the victims from further harm
- Ensure timely enforcement action is taken to restrict the success and duration of the fraud, discouraging diversification and expansion
- Use the 4 P strategy for tackling Fraud, Money laundering and Cyber Crime
- Inform colleagues, giving them the information needed to make informed, sound, rationalised decisions
- Ensure crimes are allocated based on complexity and risk, rather than type or value
- Support supervisors in the management of fraud investigations
- Provide a consistent approach to fraud reporting and investigation, in conjunction with National Fraud Intelligence Bureau (NFIB)

This procedure is aimed at staff and officers who working within:

- Force Control Room (FCR)
- Crime Recording Occurrence Management Unit (CROMU)
- Economic Crime Unit (ECU)
- All other units/departments which conduct investigations including response, Initial Enquiry Team (IET), Investigation Hubs, Criminal Investigation Department (CID) and Safeguarding Investigation Team (SIT).

Overarching Policies:

Fraud Reporting, Recording, Allocation, Investigation Procedure

Fraud Investigation Policy

Procedures:

Fraud Assessment Procedure
Crime-Allocation-and-Investigation

Other Documents:

City of London Police NFIB Crime Transfer Process
City of London Police / NPCC Fraud Escalation Process
The-Banking-Protocol
Investigating-doorstep-crime-and-rogue-traders
Investigating fraud | College of Policing
Fraud Reporting Flow Chart
Allocated Officer Flow Chart

Process

Force Control Room and Front Counter Staff

Upon receipt of a report of fraud consider if the reporting person should be referred to Action Fraud and their bank, or other financial institution. It will generally not be necessary to report a crime or crime related incident to those reporting cheque, plastic card or online bank account fraud offences. If the reporting person's (RP) financial institution requires a reference number Action Fraud will provide them with this upon receipt of their report. If the person is vulnerable, meets the call for service criteria or the property stolen needs circulating on PNC the incident requires recording and a police officer allocated. For reports requiring a PNC marker that do not require officer deployment this report should be tasked to IET supervision who will review and update the occurrence. A specific fraud question set will auto populate when a CRIME FRAUD AND FORGERY report is created. Call takers should ask all questions and record the answers before assessing whether the report meets a relevant call for service. Further guidance will be provided for call handlers.

Having complete the question set and applied the THRIVE model if the report meets the 'call for service' criteria an appropriate resource should be allocated to deal with the incident.

A "Call for Service" is defined as –

- Offences where offenders are arrested by Police **or**
- The offender 'is committing', has 'just committed or 'just attempted' fraud **and** has just made off prior to the call, **or**
- There is a known 'local' suspect - The suspect has not been arrested at the scene nor just made off, but police can or could locate a suspect with the details provided.

A known "local" suspect may include offences physically committed within the force area by unknown persons. For example, a local car dealership is scammed into creating credit agreements on a vehicle by persons physically attending the showroom - these circumstances result in "physical" lines of enquiry in NYP such as forensic opportunities or

CCTV. Remote offences committed using the phone, social media platforms or online where **only** a username, email or phone number are provided are not sufficient –these instances are suitable for reporting to Action Fraud. Should call takers or other staff require clarity on what is a call for service, advice can be sought from the Action Fraud SPOC within the Economic Crime Unit.

Banking Protocol

Where bank branch staff have concerns that a customer is at risk of financial exploitation either by an offender who is present, or nearby, or remotely via the phone or online this should be responded to. If this is a local offence, it will be investigated by NYP and reported to Action Fraud as a Call for Service. If the victim is being exploited remotely, safeguarding will be addressed, and the matter reported to Action Fraud (but not as a call for service). Further details on the banking protocol can be found here.

Offences that should NOT be referred to Action Fraud:

The following crimes by their MO should mean they meet the CFS criteria and therefore should be recorded locally and NOT referred to Action Fraud

- Making or Supplying Articles for use in Fraud e.g. making cloned credit cards / devices to obtain card details on ATM's or chip & pin machines.
- Possession of Articles for Use in Fraud e.g. possession of cloned credit cards (unless used to commit a fraud).
- Forgery Offences – including forgery of / use of forged Drug Prescription.
- Possession of False Documents e.g. false passports, driving licences, immigration documents.
- Fraud / Forgery Associated with Driver / Vehicle Records e.g. driver hour records.
- Making off Without payment e.g. petrol station drive outs.

If none of the above is applicable, unless the victim is vulnerable and requires safeguarding the victim should be informed they will need to report the matter to Action Fraud.

Initial Investigating Officer

In most cases, Police can refer persons reporting a fraud directly to Action Fraud. However, there are certain situations where Police will, in addition to reporting to Action Fraud, need to record the allegation locally and deal with the reported crime / incident. These are referred to as a “call for service”. Unless a ‘Call for Service’ criteria exists then there is no requirement to record a crime or investigate further the only exception will be if an officer is allocated to provide safeguarding and protect advice and there is an outcome classification for PROTECT for this response. If Police are with the victim and they require support in reporting fraud to Action Fraud they must do so via the web reporting tool and not via phone to the Action Fraud call centre. The Allocated Officer Flow Chart can be consulted to ensure you have been allocated the report appropriately. If you are unsure please contact ECU Fraud Assessor for advice.

If allocated for investigation, then the OIC should:

- Conduct a thorough initial investigation. This includes taking statements and securing available evidence such as CCTV. Initial Investigations should comply with PIP1 Standard.
- Consider early arrest or other opportunities to ensure the effective and timely removal of the threat and protection of victims from further harm.
- Notify the victim that all reports of fraud are recorded by Action Fraud. North Yorkshire Police will pass the details via CROMU to Action Fraud on the victim's behalf.
- Ensure VWCM/VNA is completed, and any safeguarding concerns are address by submission of a PPN or other relevant signposting.
- Update the victim in accordance with the Victims Code

A Fraud Assessor within ECU will also review the crime. Further details on this are provided in the Fraud Assessment Procedure.

On notification of a fraud offence occurring CROMU will report the crime to Action Fraud and the NFRC number will be added to the occurrence. The victim should be supplied with the NFRC number and the crime will be assigned to the officer investigating.

Fraud Assessor

ECU Fraud Assessors work Monday to Friday excluding bank holidays. They will be responsible for completing a Storm and Niche check each day to identify all fraud crime reported and identified as a CFS. Each report will be assessed in accordance with the Fraud Assessment Procedure and the Fraud Assessor will update the OEL with the outcome of this this will include a recommended action plan and suitability of allocation. This will assist officers in progressing investigations in line with APP.

Ongoing Investigation Ownership

This investigation may remain with the Initial Investigation Officer as OIC or be allocated to another investigation unit such as an Investigation Hub, CID, SIT or ECU. The OIC is responsible for progressing the investigation diligently and expeditiously in line with our investigative standard. The victim should be updated as per the agreement detailed in the VWCM and the crime report should be updated at least every 28 days.

Advice is available from a Specialist Fraud Investigator and/or a Financial Investigation throughout your investigation - contact the Economic Crime Unit.

Finalising Crimes

All recorded crimes must have the correct outcome added at the point of finalisation. The OIC should submit the crime to their supervisor for a final review and finalisation ensuring all necessary templates are created and the victim has been updated. Fraud Assessors can recommend finalisation at the point of assessment however the ECU DS will be responsible for ensuring that all necessary parts of the crime report are complete, and that the victim has been updated. Fraud reports are subject to a monthly dip sampling process carried out by the ECU DI.

Crime Recording and Occurrence Management Unit (CROMU)

If not already reported to Action Fraud CROMU are responsible for recording reported incidents of fraud with Action Fraud via the Expert Recording Tool. The NFR number should be recorded in the Occurrence Ids section. CROMU are responsible for logging into the NFIB vault to check for new allocations and creating the Niche occurrence as per their own procedure. ECU will review tasks for new allocations and the above Fraud Assessment procedure will be followed with any Cyber Crime related reports having the tasked reallocated to Cyber Crime. CROMU are also responsible for the timely dissemination of Fraud outcomes to NFIB.

Outcome Recording Process

All outcomes are currently forwarded to the NFIB via a populated spreadsheet completed every month. This process is completed and managed by CROMU. This should include all crimes allocated for investigation by NYP.

There are 5 Classification Types in the pick list:

1. FRAUD 00/00/00 FRAUD: PURSUE - Call for service for investigation (Report to Action Fraud & outcome required)
2. FRAUD 00/00/01 FRAUD: PURSUE - Referral from Action Fraud (outcome required)
3. FRAUD 00/00/02 FRAUD: No call for service – Referral to Action Fraud (outcome not required)
4. FRAUD 00/00/03 FRAUD: PROTECT – NFIB referral - Victim safeguarding only (Report to Action Fraud, no outcome required)
5. FRAUD 00/00/04 FRAUD: PROTECT – Not CFS – Victim safeguarding only (Report to Action Fraud, no outcome required)

Any occurrence classified as the above will require a Stats Class. They will all be given a 'Stats Class' with a description for 'Action Fraud'. CROMU will initially put more than one victim on an occurrence and record the NRFC reference within the Occurrence ID – the name of the Victim will be recorded within the Occurrence ID as remarks. The Offenders will be linked, and an outcome recorded for each offender. As long as the 'Outcome' applies to each Victim they can remain on the one occurrence. If there are different outcomes for the victims then we will need to generate further occurrence/s.

It will be the responsibility of the OIC to record these outcomes on NICHE and these outcomes will be collated and the NFIB updated by CROMU.

Crime Transfers requests – To and from NYP

Should further investigation establish the identity of a suspect that does not reside within the force, the appropriate form needs to be completed for review by a Fraud Assessor or ECU DS. This process is outlined within **City of London Police NFIB Crime Transfer Process**. All requests for transfer crime must demonstrate that an expeditious investigation has taken place. Transfer crime requests for investigations that have been in force for more than a month are unlikely to be forwarded to NFIB

for consideration. All transfer requests for fraud must be agreed by NFIB and force to force transfer will not be accepted unless agreed by the Fraud SPOCs for each force.

Transfers from Police Scotland

Transfers of allegations of fraud by Police Scotland identified as falling within the jurisdiction of North Yorkshire Police will be sent by them to us to record. Police Scotland will not report fraud to Action Fraud. North Yorkshire Police FCR will review the transfer request and if a recordable crime has been committed in our force area then we will record a fraud with Action Fraud and this procedure will be followed.

If a transfer of a fraud allegation is refused by us, a crime related occurrence should be recorded and the request returned to Police Scotland setting out the rationale as to why it has been refused.

A transfer of a Scottish recorded crime based solely on a beneficiary account holder's address or solely on a delivery address being in North Yorkshire should be refused – unless the surrounding circumstances of the transfer indicate that a crime should be recorded such as offences under POCA. Further evidence should be supplied by Police Scotland to support the conclusion that the fraud offence was made from North Yorkshire before being accepted.

Nothing in the above should prevent England & Wales forces aiding, in line with current protocols, to Police Scotland with their enquiries in that force area.

Escalation Process

North Yorkshire Police principles for escalation for Fraud reports are that any escalation will be administered by a member of the ECU under the authority of the ECU Detective Inspector. The full process is documented within [City of London Police / NPCC Fraud Escalation Process](#).

The following factors are intended to be a guide to help determine when it may be appropriate to escalate a case for ROCU, NLF or NECC support. The factors are not intended to be a check list nor a means of scoring or determining whether an escalation will be supported by the ROCU, NLF or other agencies.

- The criminality amounts to serious and organised crime.
- The threat or criminality is complex and to progress the investigation specialist skills and/or a multi-agency response will be required neither of which are available in-force.
- The high volume of victims or extensive level of enquiries required to conduct a proportionate investigation is greater than the level of resources that could reasonably be expected of the host force to provide.
- The threat or criminality will require extensive investigative enquiries in multiple jurisdictions.
- The threat is resulting in, or has potential to result in, systematic financial losses to private and/or public sector organisations.
- The criminality risks undermining the UK's reputation, commercial and financial interests.

- The threat is causing, or has the potential to, cause harm or significant loss to a large number of individual or corporate victims.
- The criminality or threat is an emerging trend or part of a series which would benefit from a regional or nationally coordinated response.
- The primary threat or criminality emanates from outside the UK jurisdiction and requires significant international cooperation and/or investigation.

It is envisaged that the above factors will be identified at an early opportunity by the Fraud assessor. However should local supervisors believe the above criteria are met through their ongoing investigation it is critical that early engagement with the Head of ECU takes place.

Supporting Victims

Frauds are reported to North Yorkshire Police in one of two ways, either directly or via a dissemination from the NFIB. Regardless of reporting stream victims of fraud who require support and/or safeguarding will be identified and given that support by one of more of the following:

- National Economic Crime Victim Care Unit (NECVCU)
- Commissioned Services - Supporting Victims
- Financial Abuse Safeguarding Officer (FASO)
- Fraud Assessor within the Economic Crime Unit (ECU)
- Local Policing / Fraud Ambassador

NECVCU provide support to all victims, who reside in our force area, who report crime to Action Fraud. NECVCU is a focussed and targeted service providing victims of fraud and cyber-crime a national standard of care and support. The aim of NECVCU is for victims to feel safer and more confident following contact, whilst assisting them to cope and recover from the crime and to significantly reduce the likelihood of repeat victimisation. The NECVCU provides this service through trained and experienced advocates who contact victims and provide them with advice, guidance and support as well as signposting them to relevant local agencies. Victim vulnerability is also recognised at an early stage. NECVCU will escalate reports to North Yorkshire Police if serious risks of harm are present.

NYP also support victims of fraud by responding to Banking Protocol reports and by the adoption of Operation Signature.

Financial Abuse Safeguarding Officer (FASO)

40% of all crimes committed are fraud it is therefore important that all opportunities to educate and safeguard victims of fraud are identified. As such the default position when reviewing a report of fraud is that the victim receives some form of intervention from NYP or NECVCU. These interventions can take the form of:

- a phone call
- email correspondence providing educational literature

- personal visit to discuss staying safe from fraud by a Fraud Ambassador
- safeguarding assessment by FASO to identify multi agency support

The FASO can organise group victim educational events. These events will be briefed to all NPTs in advance and will represent a reasonable intervention that can be offered to victims of fraud.

FASO will also review all banking protocol reports and is responsible for completing Vulnerable Victim Notifications in accordance with Operation Signature.

Rogue Traders

Whilst sometimes it may be appropriate to advise such reports are civil matters and it should be reported to Citizens Advice offences under the Fraud Act 2006 and the Consumer Protection from Unfair Trading Regulations 2008 may have been committed which are not civil matters. Further advice on this type of investigation can be found here.

Banking Protocol

Banking Protocol is a rapid response scheme that enables branch staff to alert the police when they suspect a customer is being scammed. Upon receipt of a call police will attend the branch meaning they can investigate the potential scam protection the customer and sometimes catching the fraudster in the act. This scheme helps prevent customers, particularly the elderly and vulnerable, from falling victims to scams. This work is being expanded and cross-channel referrals may also be received for scam victims identified via the on-line or telephone banking platforms. Further information can be found here.

Election Fraud

All allegations of election fraud or election malpractice should be directed to the force Election SPOCS who work in the ECU.

Responsibilities

Detective Sergeant Economic Crime Unit

The DS is responsible for ensuring a consistent approach by the Fraud Assessors when screening crimes. They must ensure that decisions are fully rationalised and documented in line with this procedure and National Crime Recording Standards and must address any issues in a timely manner. All investigations held within ECU will be reviewed every 28 days. The DS will be responsible in the first instance in considering any issues that arise from the outcome of the fraud assessment including queries over allocation and any victim dissatisfaction, the DS will escalate to the DI as needed.

Other roles responsibilities are as the Crime-Allocation-and-Investigation procedure

Definition of Special Terms

NLF – National Lead Force. City of London Police are the national lead police force for fraud. They also host Action Fraud, the national reporting centre for fraud and cybercrime, on behalf of policing.

NFIB - National Fraud Intelligence Bureau. NFIB sits alongside Action Fraud within the City of London Police. NFIB assess and analyse Action Fraud reports. Data matching allows reports from different parts of the country to be linked through analysis, identifying the criminals behind the frauds. Reports are sent to local police forces/law enforcement agencies for investigation. Bank accounts, websites and phone numbers which are used by fraudsters can be taken down by the NFIB.

NECC – National Economic Crime Centre – includes partners from the NCA, Serious Fraud Office, Financial Conduct Authority, HMRC, CPS, Home Office and City of London Police. They coordinate and task the response to Economic Crime.