

Enhancing police resources in the fight against economic crime cost effectively: harnessing the potential of the private and not-for-profit sectors

Report for the Dawes Trust

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CONFIDENTIAL

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‘The recommendations, if implemented collectively, would assist operational teams in both the public and private sectors to be efficient in adopting initiatives and capabilities that have already identified the blocks to success and the ways to overcome them. Can policing afford not to progress this work? I would say not.’

Ian Dyson, QPM – Former Commissioner of the City of London Police

Acknowledgements

This project relied on the contributions of a range of stakeholders and we are incredibly grateful for their involvement and their willingness to make time and share information with us so generously.

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Finally, a special thanks to the Dawes Trust for providing seed funding to make the study possible. We have found that there is enormous potential to increase the level of resources available for public policing at minimal cost (sometimes considered to be the Holy Grail). To do so will require a better understanding of the key barriers and a coordinated strategy supported centrally. The views expressed in this report are solely those of the authors and not the Trust.

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Table of Contents

Executive Summary	7
Section 1. Introduction.....	13
Aims	13
The structure of the report.....	13
Context to the report.....	14
The political context.....	15
What is meant by engagement?	17
Section 2. Mapping engagement and developing functional typologies	19
Introduction.....	19
Mapping engagement.....	19
Developing functional typologies	20
Section 3. Interview Findings.....	27
Background	27
Barriers encountered while working together	27
Summary	37
Section 4. Case studies.....	38
Section 5. Discussion and Summary.....	39
Section 6. Recommendations.....	41
Longer Term.....	41
Shorter Term	43
Appendix A – Methodology	44
Appendix B(i) – Derbyshire Constabulary	46
Appendix B(ii) – Sussex Police	48
Appendix B(iii) – National Hunter	50
Appendix B(iv) – Tenet Law	52
Appendix B(v) – Regional Fraud Forums.....	54
Appendix C – Further comments from our Project Advisors	55
About Perpetuity Research	57
About Centre for Cybercrime and Economic Crime, UOP	57
About the authors.....	58
About the project advisors	60

List of Figures

Figure 1: Different levels of engagement	17
Figure 2: Functional typologies for tackling economic crime	21

Executive Summary

Aims and Objectives

Levels of economic crime have soared to alarming levels in the last decade. Even with significant underreporting, the volume of offences has placed a strain on police resources and this has served to undermine the ability of law enforcement to respond effectively. Meanwhile, parts of the private and not-for-profit sectors dedicate significant resources to combatting economic crime. Banks and insurance companies for example, employ thousands of staff in anti-fraud roles. This expertise is largely invisible to the police, representing a massive, wasted opportunity.

Efforts to harness the work of the private and not-for-profit sectors to assist public policing initiatives to tackle economic crime have been slight, an observation as true for the UK as it is other countries. Much of the focus, where it does exist, appears to centre on data sharing while there are many other initiatives. Indeed, the link between the lack of resources and the potential to harness the work of others is rarely made. How can such a glaring gap exist? The overall aim of this project was to begin to address this question, more specifically:

- To identify the forms of joint efforts taking place that can serve as a reference point to inspire and guide future initiatives;
- To highlight some successful examples of engagement;
- To indicate the factors that are needed to replicate success;
- To lay the foundations for a larger scale study examining the ways in which additional resources from the private and not-for-profit sectors can cost effectively be harnessed to significantly improve the law enforcement response to fraud.

To understand the landscape of organisations working together we employed three key methodologies. First, we mapped the services provided by both private and not-for-profit entities that support (or have the potential to support) law enforcement responses to economic crime. Second, we developed a set of five illustrative case studies to demonstrate diverse forms of engagement. Third, we conducted in-depth interviews with stakeholders involved in various aspects of fraud prevention and enforcement to identify both the potential opportunities and the existing barriers to working together.

The output is designed to provide a resource for law enforcement, counter-fraud leaders and policymakers. Our mapping of existing initiatives will serve as a reference guide, facilitating opportunities to benefit from current provisions and inspiring replication and new ways of working.

Different forms of working together

When discussing engagement, it is essential to recognise it occurs at varying levels:

- ‘Awareness’ involves informing stakeholders through informal channels like newsletters, social media, or occasional meetings, ensuring they are knowledgeable about issues and initiatives;
- ‘Cooperation’ takes this a step further by seeking more stakeholder input through consultations, fostering two-way communication and trust;
- ‘Collaboration’ involves stakeholders working together on joint efforts, with shared responsibilities, enhancing ownership and commitment;
- ‘Partnerships’ are long-term, structured agreements involving shared governance and resources to achieve comprehensive and impactful outcomes. Each level requires different efforts and offers unique opportunities for effective engagement to tackle economic crime.

Mapping the existing provision

Through personal contacts, web searches, interviews, and consulting with our project advisors, we identified 75 joint initiatives operating in the UK that have been, in different ways, set up to tackle different aspects of economic crime.¹

The first task was to map these initiatives. The mapping involved documenting, where possible, the aims and objectives of each arrangement, the scope of the work undertaken, the types of agencies involved, the number of partners, the type of economic crime problems focused on, and the level of sophistication of the initiative. It transpired that over half of these initiatives already involved the police or other law enforcement agencies to some extent. For the full map of initiatives see: <https://perpetuityresearch.com/mapping/>

As far as we are aware, this is the first time this exercise has been undertaken and is the best available reference point for practitioners to use to find out what others are doing to tackle economic crime.

Typologies

Developing typologies from our mapping exercise enabled us to identify 'different types of joint efforts currently aimed at tackling fraud. From these, we devised nine functional typologies based on the primary aim each initiative was established to achieve. The nine typologies we identified are:

- Detection and Investigation
- Disruption and Intervention
- Awareness Raising and Campaigning

¹ In this report we use the term ‘economic crime’ which includes fraud and other offences such as money laundering. Some studies or publications referenced may relate only to fraud offences.

- Education and Training
- Professional Development and Networking
- Sharing Data and Intelligence
- Victim Support
- Volunteering Opportunities
- Asset Recovery

This categorisation revealed that many initiatives serve multiple purposes, for example, intelligence and data sharing feature in many types of initiatives. However, by organising our findings into these functional typologies, we created not only a reference point for now, but also one that can guide future initiatives, making it easier to align efforts and share resources to address the complex, multifaceted challenges of tackling economic crime.

To further illustrate our findings, we include five case studies, each focusing on identifying different types of initiatives that having established a reputation for good practice and/or demonstrated the potential to be replicated. Each case study includes details on the background to the initiative, the key players involved, its main aims and objectives, and the barriers to replication. These can be found in Appendix B and include:

- Derbyshire Constabulary – working with local banks and others to help identify vulnerable victims;
- Sussex Police – supporting scam and romance fraud victims following on from their successful Op Signature initiative;
- National Hunter – sharing data and intelligence to identify fraudulent behaviour;
- Tenet Law – creating volunteer opportunities with students to enhance their experience and help victims;
- Regional Fraud Forums – uniting and supporting counter fraud professionals in their fight against economic crime.

Key barriers to joint working

Our interviews with stakeholders sought to explore the mechanics of joint-working arrangements and specifically to identify the key barriers. These were:

Different aims, roles and responsibilities: Different organisations and individuals have their own distinct objectives and priorities. Aligning these with collective goals is both necessary and challenging. The diverse number of stakeholders involved; often operating within different legal and regulatory frameworks; and with different forms of accountability added more complications to joint working. Some more formal initiatives had Memorandums of Understanding or other partner agreements, but most were based on very loose and informal arrangements. This meant that overall aims were not always stated and that roles and responsibilities were sometimes unclear.

Reluctance to share data and intelligence: There was widespread concern about contravening the General Data Protection Regulations (GDPR), fuelled

by a sometimes-bureaucratic process for managing compliance. Engagement was further compromised by, on the one hand, a police service culturally averse to sharing, and on the other, business concerns about information leaks which may give competitors a market advantage. Too often the risks of sharing were perceived to exceed the benefits. Moreover, the lack of good reference points thwarted progress.

Lack of time, resources and skill sets: Ironically, a significant barrier to the police in harnessing value from services provided in the private and not-for-profit sectors was a lack of identifying potential skills gaps and recruiting to these. This is not too surprising. It has long been recognised that while using volunteers can increase resources and expertise, the process of recruiting the right people and meaningfully engaging them is not trivial. Even the process of attracting funding to start an initiative was commonly viewed as burdensome. Industry-funded police units were seen by some as the gold standard. Yet even here some police interviewees were concerned they undermined police independence, while the private sector interviewees sometimes struggled to understand the return on investment (ROI).

Mutual mistrust and silo mentality: Concerns focused on the differing philosophies: put simply, the police commitment to serving the public good versus the commercial imperative of the private sector. Some police interviewees expressed concern that a successful private or not-for-profit sector operation – especially in areas where the police are traditionally seen as experts - might undermine public confidence in the police.

Overcoming these barriers demands nuanced strategies that prioritise transparency, mutual benefit, and a shared commitment to public welfare, paving the way for more robust and joint-working in the future.

Conclusion

Our most striking finding is that there is enormous untapped potential for the police to engage with the private and not-for-profit sectors to better tackle economic crime. When done well, such joint ventures can provide additional resources, fill gaps in existing police provision, add expertise and increase the range of skillsets available, and culminate in better policing.

Our mapping exercise and case studies provide examples and a key reference point that we hope will inspire copycat initiatives. Crucially, we have assessed the key barriers to expanding the opportunities and suggested ways in which they might be overcome.

Recommendations

Longer Term

- That research is conducted to better understand the precise problems encountered in sharing data and intelligence; to learn from those who have overcome these difficulties and provide a reference document – with illustrative examples – to guide economic crime practitioners.
- Work is needed to identify those agencies the police would most like to engage with (such as technology organisations); understand the type of engagement required; determine what input they would like from those agencies; and the barriers to initiating joint-working and the steps needed to overcome them.
- Where organisations have the resources to conduct their own investigations into economic crimes committed against them, further work is needed to explore; the types of cases that offer the greatest potential; the specific flaws that undermine police faith in the process; the potential routes to rectifying these, including the potential of an accreditation system, and/or the setting of recognised standards.
- Work is needed to better understand how industry-funded initiatives can be set up to tackle economic crime and how these can be presented to other sectors/groups beyond banking and insurance sectors, for successful implementation.
- An aide memoire is needed to guide police units working in different areas of economic crime on the best ways of engaging and deploying volunteers, clarifying the key areas they can work in, the types of agencies they can engage with, and examples of what has worked and not worked.
- To research the key benefits derived by different parties working together; to articulate the types and forms of engagement that will best result in achieving and replicating these benefits. The output would serve as a guide to maximising the benefits of engagement.
- Evaluation is required to see what works and what does not. This could be undertaken in two parts: first, as a general assessment, and secondly, to focus on the cost-effectiveness of some schemes.

Shorter Term

- Liaise further with private and not-for-profit organisations who provide evidential files for investigations in order to clarify requirements, to enable the police to maximise the use of this external support.
- Review police volunteer schemes in operation to ensure that they are operated to achieve optimal benefit, for example by extending the skillsets

available to tackle economic crime. Additionally, to understand how they are funded and resourced.

- Adopt Op Signature principles and work with relevant agencies to implement these and expand to any related further needs of their population (such as support specific type scams).
- Engage with financial institutions (banks, credit agencies, Post Offices etc) and those services who come into contact with vulnerable economic crime victims, to establish and then implement best practices.
- Work with local Regional Fraud Forums in order to network and identify further opportunities to work together.
- Approach local law firms, universities and law colleges to explore the feasibility of setting up pro bono schemes to provide law students with practical experience and the opportunity to help the police in providing legal advice/support to victims of economic crime.

Section 1. Introduction

1.1 Perpetuity Research and the Centre for Cybercrime and Economic Crime, University of Portsmouth were funded by the Dawes Trust to undertake research investigating how police resources for tackling economic crime could be enhanced by harnessing the skills, capacity and opportunities the private and not for profit sectors offer. This project was carried out from August 2023 to February 2024.

Aims

1.2 The main aims of the research were:

- a) To identify the types of joint efforts taking place within the private and not-for-profit sectors that could potentially support police work;
- b) To highlight successful examples of engagement between the police and the private and not for profit sectors;
- c) To identify key factors that would support successful replication of engagement;
- d) To carry out initial scoping work to support a more comprehensive study which will examine how private and not-for-profit sector resources can be used cost-effectively to improve the police response to fraud.

1.3 The aims were achieved by:

- a) Mapping the services offered by private and not-for-profit entities supporting law enforcement response to fraud in the UK;
- b) Developing a set of five illustrative case studies highlighting the breadth and diversity of different types of engagement highlighting practice points regarding successful engagement;
- c) Carrying out interviews which explore the potential of working with and supporting law enforcement, and the barriers that prevent this, with a broad range of stakeholders involved with tackling fraud.

1.4 Details of our Methodology can be found at Appendix A.

The structure of the report

1.5 The report is structured as follows:

- **Section 2** outlines the mapping and typology of partnership engagement.
- **Section 3** provides an analysis of the interview findings drawn from relevant experts and practitioners exploring some of the barriers to working together as well as some of the benefits.
- **Section 4** looks in more depth for some of these arrangements through five case studies.
- **Section 5** provides a summary and discussion of the key findings of the research.

- **Section 6** details recommendations to improve and encourage further engagement between the police and private and not-for-profit sectors to tackle economic crime.

Context to the report

- 1.6 A wealth of evidence demonstrates that economic crime is reaching epidemic levels in England and Wales. The latest Crime Survey reports that for the year ending December 2023 there were 3.1 million fraud offences committed against individuals.² A pilot survey of businesses published by the Home Office in 2023 shows that in the previous three years 18% had been victims of fraud and 5% of corruption.³ Cifas also reported that for the year 2022 that, 409,000 cases of fraudulent conduct were recorded to their National Fraud Database (NFD) – the highest volume of cases ever reported,⁴ and although this figure dropped to 374,160 in 2023, some categories showed an increase.⁵ Almost incredibly, however, only around 15% of victims report being defrauded either to the police or Action Fraud’, despite the fact that almost a quarter of fraud victims (22%) are likely to be deeply affected, experiencing very high levels of financial loss and emotional strain.⁶
- 1.7 Despite the low levels of reporting, evidence shows that police struggle to manage the current volume of offences. A 2021 report by His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) found that fraud services are under-resourced and cases are not prioritised, with fewer than 1% of police personnel dedicated to fraud investigation, and that fraud victims frequently receive poor service.⁷
- 1.8 There is a lot of work undertaken in the private and not-for-profit sectors across the country tackling different types of economic crime in a variety of ways. For example, the banking and insurance sectors have successfully implemented a number of fraud prevention initiatives to reduce the amount of fraud committed against them and to protect their customers, and the Dedicated Card and Payment Crime Unit (DCPCU) has long been heralded as a good initiative, yet the replication and

² ONS (2023) Crime in England and Wales: year ending December 2023. <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingdecember2023#fraud> It should be noted the definition adopted was a wide one.

³ Home Office (2023) Economic Crime Survey 2020. <https://www.gov.uk/government/publications/economic-crime-survey-2020/economic-crime-survey-2020#main-findings>

⁴ <https://www.cifas.org.uk/insight/reports-trends/fraudscope-2021#:~:text=2022%20saw%20over%20409%2C000%20cases,type%2C%20with%20over%2070%2C000%20cases>

⁵ Cifas (2024) This is Fraudscope 2024. <https://www.fraudscope.co.uk/>

⁶ Victims Commissioner (2021) Fraud surged by 24% under Covid. Now a new study reveals around 700,000 victims a year are likely to be highly vulnerable to fraudulent crime and seriously harmed by it. <https://victimscommissioner.org.uk/news/who-suffers-fraud/>

⁷ HMICFRS (2021) Spotlight report A review of Fraud: Time to Choose. <https://assets-hmicfrs.justiceinspectrates.gov.uk/uploads/a-review-of-fraud-time-to-choose.pdf>

development of similar models have been slow.⁸ Collectively they provide a saving on police resources; help in protecting the national infrastructure (often undertaking the work the police could not do); and provide a pool of expertise that is already invaluable, and could be more so, if there was any serious attempt to meaningfully engage with it.

- 1.9 Juxtaposed with this, the private and not-for-profit sectors have developed comprehensive, and highly-skilled workforces targeting economic crime. For example, there are estimated to be approximately 10,000 private investigators,⁹ and several thousand forensic accountants and lawyers working in the insurance sector, and one leading bank alone employs over 8,000 people in anti-fraud and money laundering roles.¹⁰ Moreover, dozens of companies (such as accountancy firms and others involved in forensic activities) offer niche products and services, selling them to both the public and private sectors to address economic crime.
- 1.10 In addition, there are numerous not-for-profit sector organisations conducting important work in this area. This includes specialist bodies that manage data and share intelligence, such as Cifas, National Hunter, the Insurance Fraud Investigators Group (IFIG) and the Insurance Fraud Bureau (IFB). Fraud Forums operate across England and Wales, bringing together diverse groups to share knowledge and raise awareness. There are also more focused groups that tackle specific frauds, such as Petscams.com, which aims to catalogue scam websites which purport to sell pets and ScamAdviser, which provides a free service to check the legitimacy of consumer websites. There are also more controversial initiatives of volunteers engaging with scammers through 'scambaiting' with the intentions of wasting their time, gaining information or exposing their illegal activities.¹¹

The political context

- 1.11 There exists a patchwork of activities undertaken by those organisations tackling economic crime, and contributions are largely fragmented and unmapped, with limited research conducted on them.¹² Developing a better understanding and mapping these activities would help to identify where untapped resources exist, and ultimately consider how these could be connected or integrated with law enforcement to mutual benefit. Additionally, the introduction of a 'failure to prevent' offence,¹³ driven in

⁸ Button, M. (2023). Working with Private Policing to Enhance Public Policing: The Case of the United Kingdom. In Handbook on Public and Private Security (pp. 223-241). Springer International Publishing.

⁹ Judes, L., (2010). Scoping the private investigation market: stakeholder interviews summary. London: Central Office of Information

¹⁰ Personal communication to Professor Mark Button

¹¹ Button, M., & Whittaker, J. (2021). Exploring the voluntary response to cyber-fraud: From vigilantism to responsabilisation. *International Journal of Law, Crime and Justice*, 66, 100482.

¹² Button, M., Hock, B., & Shepherd, D. (2022). *Economic crime: from conception to response*. Routledge.

¹³ Economic Crime and Corporate Transparency Act 2023 introduces an offence where a large company could face criminal prosecution and an unlimited fine where an employee or associate of the organization commits a fraud for the benefit of it. This is likely to make

part by a desire to make executives more responsible, has been designed in no small measure to generate a change in behaviour within organisations to both prevent and pursue more fraud.

- 1.12 Meanwhile, the (old) Government's Fraud Strategy¹⁴ set out an extensive range of measures to counter fraud. It briefly mentions (para 42) exploring the means to draw upon the skills of the wider public sector and private sector particularly through the emerging Public Sector Fraud Authority. The strategy also proposes an 'Anti-Fraud Champion' whose remit is to work with partners in industry to ensure all are playing their part in fraud prevention. Additionally, the strategy emphasises the importance of the Joint Fraud Taskforce at the national level and highlights some of its important work which brings key partners from the private and public sectors together. Historically, governments have been positive about partnerships and have seen them as central in helping deliver the ambitious aims of the strategy, albeit underplaying the potential of the private sector to enhance these, Nor does it discuss the range of initiatives that exist and whether any could serve as reference points.
- 1.13 Of note, there is very little detail in the strategy about how closer working might develop. In part this reflects the lack of readily available data on the extent and nature of counter-fraud partnerships in the UK. There is no definitive list of these, let alone data about their activities, membership, information sharing practices, constitution, or the impact they have on fraud. The state, in the form of enforcement bodies such as the police, National Crime Agency (NCA), the Serious Fraud Office (SFO), trading standards officers, Home Office etc. cannot achieve the aims of this strategy alone. They require the support of the many private entities, not-for-profit bodies, other public sector bodies and the public to deliver this.
- 1.14 As noted, there are already well-known partnerships in the financial services and insurance sectors (such as those with UK Finance or the Insurance Fraud Bureau), yet there are many more initiatives that attract much less attention at national, regional and local levels. To facilitate the requirements of the strategy for working together, in building joint strategies and facilitating actions, it is essential to understand this landscape and to profile good practice.
- 1.15 This report, building upon other research conducted for the Dawes Trust and other funding bodies, will provide the first definitive mapping of those engaged in working together to tackle economic crime in the UK, an exploratory analysis of their activities and structures, provide case studies of how some operate, and explore the barriers to their development and the benefits they bring. The report serves as a foundation for further research and also a resource for law enforcement,

companies more focused upon having adequate procedures in place to prevent such actions, as a potential defence under Section 199 (4) a is "the body had in place such prevention procedures as it was reasonable in all the circumstances to expect the body to have in place."

¹⁴ HM Government (2023). Fraud Strategy: Stopping scams and protecting the public. London: HMSO.

counter-fraud leaders and policy-makers to guide action. It can form the basis for improving how law enforcement can effectively use the resources of 'partners' to help police economic crime across industries and regions more effectively.

- 1.16 Readers may also wish to read our forthcoming annual Security Research Initiative (SRI) report, titled 'Optimising Joint Working between the Police and Private Security,' which will be published in October 2024.

What is meant by engagement?

- 1.17 Before presenting the findings of this research, it is important to set out what we mean by engagement. Scholars focused upon policing in general have identified a wide range of models and words to describe them which often have specific meanings.¹⁵ For this research, we have looked at different levels of engagement and have categorised and defined these as shown in Figure 1.¹⁶

Figure 1: Different levels of engagement



- 1.18 **Awareness:** Awareness engagement focuses on making people or organisations cognisant of particular topics, issues, products, or initiatives. In such arrangements, individuals may share information, and work towards a defined goal. Consequently, roles in these initiatives are loosely defined and flexible. Such engagements are characterised by informal relations and structures, limited communication, minimal decision-making, and can lack stability.¹⁷ However, such informal arrangements have advantages offering flexibility and adaptability: partners are free from rigid structures and bureaucracy. Many fraud awareness campaigns fit this category with organisations coming together to jointly develop and promote key messages but then dissolving on completion.

¹⁵ See, Bryett, K. (1996) Privatisation - Variation on a Theme. *Policing and Society*, 6(1), 23-35; and Chaiken, M. and Chaiken, J. (1987) *Public Policing – Privately Provided*. Washington DC: National Institute of Justice.

¹⁶ Our model has been partly influenced by Liddle, A. M., & Gelsthorpe, L. R. op cit., who for general crime prevention noted: communication, co-operation, co-ordination, federal and merger in a hierarchy of collaboration in general crime prevention.

¹⁷ Frey, B. B., Lohmeier, J. H., Lee, S. W., & Tollefson, N. (2006). Measuring collaboration among grant partners. *American journal of evaluation*, 27(3), 383-392.

- 1.19 **Cooperation:** Cooperation entails greater interaction among members compared to Awareness initiatives. Parties come together for a shared purpose while retaining individual independence. It involves individuals or groups working closely together, sharing resources and information, but without necessarily merging their efforts to the same extent as in Collaboration (see below). In contrast to the former category, these arrangements are more permanent, involving basic agreements and regular meetings.¹⁸ The regional Fraud Forums, especially their work with local Regional Organised Crime Units (ROCU),¹⁹ would be an example of this type of engagement.
- 1.20 **Collaboration:** Collaborative engagement involves working together with others to achieve a specific common goal. It emphasises the exchange of ideas, skills, and resources among participants. Collaboration can happen within a team, across departments within an organisation, or even between different organisations. It fosters a sense of shared ownership and responsibility for the outcomes. Collaborative engagement often requires effective communication, teamwork, and coordination. Collaboration implies a much stronger foundation than is that case with Cooperation initiatives.²⁰ Examples of these would include the various partners working with the NCA, allowing them to proactively identify and implement targeted disruptions and prevention strategies.
- 1.21 **Partnership:** Partnership engagement involves a more formal and long-term commitment between entities where common functions are delivered. Partnerships can take various forms, such as strategic alliances, joint ventures, co-development projects, or even mergers. The aim is to leverage each parties strengths and resources to achieve mutual benefits. Partnerships often require clearly defined roles, responsibilities, and agreements, as well as a high level of trust and transparency.²¹ Cifas would be an example of this with a strong organisation that has grown from dozens of financial institutions, police and public sectors coming together to share data on fraud for each other's benefit.
- 1.22 In many cases, engagement can progress from 'Awareness' to 'Cooperation' and 'Collaboration' and potentially evolve into a full 'Partnership'. For example, when addressing a societal issue, an organisation might start by raising awareness through a campaign, then collaborate with other entities to develop solutions, and ultimately form partnerships to implement those solutions on a larger scale.

¹⁸ Giesecke, J. (2012). The value of partnerships: Building new partnerships for success. *Journal of Library Administration*, 52(1), 36-52.

¹⁹ <https://www.rocu.police.uk/>

²⁰ Carnwell, R., & Carson, A. (2005). Understanding partnerships and collaboration. *Effective practice in health and social care*, 4-20.

²¹ Douglas, A. (2008). *Partnership working*. Routledge.

Section 2. Mapping engagement and developing functional typologies

Introduction

- 2.1 As economic crime offenders become increasingly organised and their crimes harder to detect, marshalling all the resources available has become not just a prerequisite for an effective response, but, in the face of public sector resource constraints, essential. The traditional siloed approach is no longer sufficient in addressing these challenges.
- 2.2 Combining the strengths and expertise of multiple entities can help create a more formidable challenge to financial crime offenders. Pooling resources and sharing expertise, information and intelligence, in theory at least, amplifies the capacity to detect, prevent, and respond to economic crime. While such arrangements for tackling economic crime are quite common between public sector bodies, engagement with the private and not-for-profit sectors is less advanced.
- 2.3 This section explains our process of identifying, mapping, and classifying the various groups involving private and not-for-profit organisations engaged in tackling economic crime. For a detailed view of the mapping document please see <https://perpetuityresearch.com/mapping/>

Mapping engagement

- 2.4 Through extensive desktop web searches, comprehensive interviews, active engagement with our project advisors, and leveraging our own contacts and existing knowledge, we have successfully identified 75 multi-party engagement arrangements specifically established to address economic crime. Notably, fifty-three of these arrangements involved direct engagement with police forces, underscoring the critical role of law enforcement in combating economic crime.
- 2.5 For each of the identified engagement arrangements we recorded essential details such as the lead partner of the initiative, the various parties involved, and the main contact details for each arrangement. This detailed documentation was crucial for conducting further in-depth analysis. The analysis focused on several key dimensions to understand the nature and effectiveness of these arrangements:
 - Type and number of partners – we categorised the types of partners involved, whether they were public sector agencies, private sector companies, non-profit organisations, or other entities. The number of partners involved in each arrangement was also recorded to assess the degree of working together;
 - Fraud type – the specific types of economic crimes addressed by each arrangement were identified. This included various forms of fraud, such as romance scams, banking fraud, cyber offences and money laundering;

- Scope of work – the range and extent of activities undertaken by each arrangement were analysed. This included preventive measures, investigative and detection actions, awareness campaigns, and professional support and training;
- Sophistication – we evaluated the complexity and sophistication of the engagement arrangements. This encompassed the use of advanced technologies, innovative practices, and the overall strategic approach;
- Main aims and objectives – the primary goals and objectives of each arrangement were documented to understand their intended impact and success criteria.

2.6 Due to the limited scope of this research and the diversity of engagement arrangements identified, we were unable to conduct a detailed analysis of working arrangements across different levels of engagement. Our research primarily focused on the overarching structures and key characteristics of the engagement arrangements rather than delving into the nuances of varying levels of engagement.

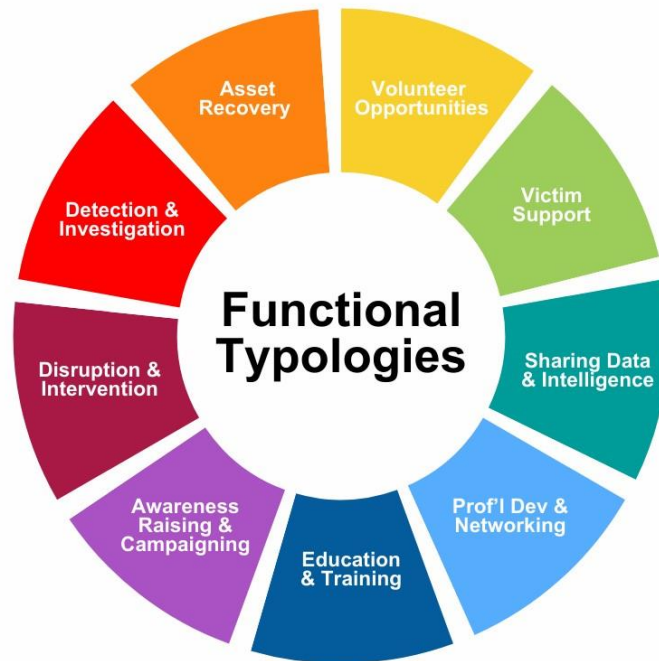
Developing functional typologies

2.7 Although from our mapping exercise we identified many initiatives focused on different aspects of economic crime, there is no single locale or comprehensive resource for identifying these various forms of engagement. Moreover, it is challenging to determine the associated benefits that the police could leverage to their advantage. Therefore, our initial task was to assess existing efforts and identify any underlying issues. The findings are instructive, as they indicate that engagement occurs across a range of topics, but these largely operate under the radar.

2.8 In order to consider these joint working arrangements, we developed a number of functional typologies which offer a structured framework for organising information into relevant categories.²² The characteristics of each engagement considered included whether the police were involved and, if so, the extent; whether the main objective was detection, prevention, or victim support; and the scope of the engagement, among other factors. We opted for the following functional typologies detailed in Figure 2, based on the primary aim of each engagement. It is noteworthy that there were numerous examples of multi-functional initiatives. Detailed mapping documents can be viewed here: <https://perpetuityresearch.com/mapping/>

²² Typologies: Forming concepts and creating categorical variables
M. Janet, H.E. Brady, D. Collier (Eds.), Oxford, *Oxford University Press, The Oxford Handbook of Political Methodology*. (2008), pp. 152-173.

Figure 2: Functional typologies for tackling economic crime



2.9 The following sections consider each of the typologies, identifying examples from our mapping exercise.

Detection and Investigation

2.10 To uncover and prove instances of economic crime, a number of processes and techniques need to take place, including gathering evidence and analysing the results to identify any irregularities or criminal activity that have taken place. It is impractical for law enforcement to undertake all of these tasks, and many private organisations have the staff, capability, and expertise to conduct their own investigations. Although this should benefit the police, with the private sector assuming responsibility for some investigations and handling some of the workload, it was not universally viewed that way.

2.11 In short, the police had several concerns, including the confidentiality and security of data, potential misuse of information or breaches of privacy, lack of full adherence to criminal rules of evidence and disclosure, and overall due diligence for areas for which they were not responsible. In addition, there were concerns that the discovery of malpractice (or even a minor, but significant infraction) might lead to a very public and humiliating case collapse in court. The police's view is that law enforcement agencies are required to adhere to a higher level of standards when investigating economic crimes, standards that are not necessarily matched in the private sector.

2.12 Such concerns were expressed both by the police and those from the private sector:

'We need to be clear about it (investigations), they each work to different standards. The private sector can do covert stuff that the police can't, so it's wrong for the private side to do it (investigations)...it needs to be proportionate and legal.' (Private Sector)

'We get cases from the private sector that they've investigated, but often they're poor quality, too civilian rather than criminal standards of evidence and do not always accord with the priorities of the police force.' (Police/ROCU)

- 2.13 Moreover, it was also noted that there is a related issue of prioritisation; while private sector organisations may initiate an investigation for all types and values of loss, the police tend to prioritise cases according to a different criterion, primarily on the level of impact on the victim and/or the likelihood of conviction:

'This is reasonable and logical in generic terms, but when it comes to offences against large-scale profitable corporates, there is low impact on the victim. One officer even said to me "You can afford the loss".' (Private Sector)

- 2.14 The majority of partner engagement involved in the detection and investigation of economic crime, as identified during our research, involved a law enforcement agency of some kind. However, there remains significant opportunities for the private sector to be more involved if it could better engage with the practices and standards required by the police.

Disruption and Intervention

- 2.15 Disrupting and intervening in economic crime involves taking proactive measures to hinder illegal activities before they occur or escalate. In contrast, detecting and investigating are reactive measures. Many economic crimes are highly complex and organised, and this can complicate engagement as it often necessitates the need for more formal structures and not least, aligned objectives. Moreover, the global nature of offences such as identity theft, social engineering, and computer hacking, combined with perpetrators demonstrating high levels of skill and adaptability, increases the scale of formality generally required.

Awareness Raising and Campaigning

- 2.16 Raising awareness about economic crime is crucial to empower individuals and organisations to protect themselves. Effective awareness campaigns involve a strategic approach. During our mapping exercise we noted a number of schemes focused on raising awareness and campaigning, particularly in relation to scam-type offences. The National Trading Standards (NTS) Scams Team plays a pivotal role in tackling mass marketing scams and disrupting the operations of perpetrators, working with numerous agencies across the country. NTS is also

responsible for the 'Friends Against Scams' Initiative. Much of this work takes place with regional and local schemes, many of which are run in conjunction with local authorities, the police, and charities, particularly those supporting the elderly population. Many of these initiatives have dedicated websites offering support, guidance, and practical tips to avoid falling victim to scams. Additionally, other initiatives noted during our mapping exercise included those focusing on raising awareness of and campaigning around business crime, cybercrime, and finance.

- 2.17 It is important to note however, that awareness campaigns need to communicate a consistent message and this seemingly does not always happen, especially when run at local or regional levels, and therefore risks confusion for the public. The City of London Police are currently exploring how to develop a methodology for ensuring that such messaging is aligned at a national level.

Education and Training

- 2.18 Education and training of organisations and individuals are crucial to build a robust defence against economic crime. By adopting a comprehensive and proactive approach to education and training, organisations can empower their workforce to detect, prevent, and respond effectively to economic crime. This can take many forms including customised training programmes, interactive workshops, and online learning that addresses specific needs and risks to organisations and keeps them updated on the latest trends, technologies, and threats.
- 2.19 Two main areas were identified during our mapping exercise which aimed to develop and provide education and training. Firstly, in a number of instances, engagement had been established between the police and financial institutions to enhance the knowledge of people working with potential scam and fraud victims on a day-to-day basis. These types of initiatives have enabled some police forces to work closely with local banks, ensuring that staff are trained to identify suspicious banking activity among vulnerable customers (refer to Appendix B(i)). Secondly, we identified several ongoing projects focused on educating young people about fraud, including lobbying to include fraud on the National Curriculum as part of personal, social, health and economic (PSHE) education. Parties were also keen to highlight to young people the dangers of becoming involved in money laundering schemes by becoming a money mule. The engagement that we identified between police and financial institutions was clearly defined and easily replicable.

Professional Development and Networking

- 2.20 Professional development and networking initiatives are important engagement tools to support and maintain the skills of professionals working in counter-fraud pathways. They ensure that individuals stay informed about the latest trends, tools, and best practices, while also enabling them to connect with other professionals in the field.
- 2.21 A number of forums and networks exist which are detailed in our mapping documents. These include regional Fraud Forums (see case

study Appendix B(v)), the Telecommunications UK Fraud Forum (TUFF), which draws members from the telecommunications industry and associated organisations, and networks specifically aimed at women in anti-fraud roles, such as the Female Fraud Forum and the Fraud Women's Network. Some of these groups are solely geared towards the professional development of their members and providing networking opportunities, while others, such as the regional Fraud Forums, actively work with law enforcement at no cost to the police service to help prevent and raise awareness of economic crime. Further forums and networks could be formed, particularly for specific types of economic crime. Additionally, those that do not currently, can establish connections with the police at both national, regional, or local levels.

Sharing Data and Intelligence

- 2.22 Sharing data and intelligence are critical when aiming to address economic crime and fosters a collective and informed approach among various organisations. However, as detailed later in this report (refer to Section 4), achieving this is not always straightforward as many organisations fear breaching data protection regulations, are afraid of reprisals or repercussions that may arise as a result, or feel that their business is too commercially sensitive to share data or intelligence. Therefore, it is necessary to strike a balance between sharing necessary information to combat financial crime and recognising the privacy and confidentiality of any data or intelligence shared.
- 2.23 We identified a number of organisations that engaged in data and intelligence sharing, but this was limited to specific types of economic crime. The financial and insurance sectors have made great strides in recent years, but this has yet to be replicated to any great extent in other sectors. Our mapping revealed that organisations, such as JMLit,²³ Cifas, and National Hunter, designed with data sharing at the core of their anti-fraud operations, have effectively addressed perceived barriers, particularly concerning data protection. However, a major obstacle highlighted by the private and not-for-profit sectors pertained to a lack of reciprocity of data and intelligence when working with the police.

Victim Support

- 2.24 Supporting victims of economic crime is crucial, research shows that people not only endure financial losses but significant emotional and psychological impacts. The police have limited roles and responsibilities in aiding victims due to constraints in time, expertise, and resources. Therefore, it is essential that other agencies are available to fill the gap. Many of these organisations, such as Victim Support, Age UK, and Citizens Advice Bureau, are charities that rely on donations or funding from other bodies, including the police.

²³ <https://www.nationalcrimeagency.gov.uk/what-we-do/national-economic-crime-centre>

2.25 During our mapping exercise, we identified several types of support offered to victims, including:

- *Crisis hotlines* providing dedicated support to victims of fraud and scams. This support includes offering information, emotional assistance, and guidance on available resources;
- *Legal assistance* to ensure that victims are aware of their rights and receive help navigating through legal processes;
- *Financial advice* aimed at helping victims manage any debt and rebuild financial stability in the aftermath of a fraud or scam;
- *Emotional support* for victims through one-to-one counselling or group support. This is particularly crucial if they feel betrayed, anxious, and ashamed after being defrauded;
- *Resource referrals* to other groups, agencies, or assistance programs.

2.26 Victim support for economic crime tends to focus on help for individuals who have been defrauded through scams. Many such organisations working alongside the police throughout the UK, and our mapping identified a number of more developed schemes, such as Operation Signature, (refer to case study Appendix B(ii), which the NPCC have approved and recommended to all police forces in England and Wales. The scope of multi-agency engagement for victim support appears to be expanding and in particular the area of romance fraud has been noted as one where victims frequently need personal support. Particularly good examples of engagement in this area included Essex Police and LOVESAIID, which aims to change the stigma of being victimised by romance fraud through practical and mental health support, education, and training.

Volunteer Opportunities

2.27 While volunteering opportunities with police forces have existed for many years, primarily in the realm of community engagement, it is only recently that forces have recognised the advantages of leveraging the specialist skills from those involved in the day-to-day fight against economic crime. Volunteers possessing expertise in areas such as cybercrime, financial markets, and forensic accounting are particularly in demand. Several forces, including Avon and Somerset, as well as regional economic crime units like the West Midlands, actively recruit individuals with proficiency in these areas.

2.28 The National Crime Agency (NCA) also offers a similar scheme known as the 'NCA Specials' scheme.²⁴ Other volunteer schemes identified through our mapping exercise included students from the University of Birmingham's Law school, who work with and are supervised by Tenet Law firm. These volunteers undertake initiatives to raise awareness of

²⁴ <https://www.nationalcrimeagency.gov.uk/careers/how-to-join-the-nca/nca-specials>

scams and to provide support to those who have fallen victim such crimes (refer to case study Appendix B(iv)).

- 2.29 Volunteering to assist in addressing economic crime can be a valuable means of contributing to the community and supporting endeavours to prevent and combat fraudulent activities, providing access to specialised skills that the police might not otherwise have access to. Some suggested a notable advantage for the police is that volunteers, being unpaid, do not incur a direct cost albeit recruiting, managing, and engaging with volunteers — particularly to integrate them into the team — all require time and effort. Comments from officers interviewed suggested another barrier to fully capitalising on this opportunity lies in limited access to IT equipment and police data. Volunteering potentially generates opportunities for businesses through their Corporate Social Responsibilities (CSR) with potentially a host of companies very keen to support – and to use and publicise their support commercially.

Asset Recovery

- 2.30 No specific groups working together to directly benefit the police in this area were identified in the UK other than private entities working together in contractual arrangements, which was beyond the scope of our project. In theory, however, such arrangements could be developed in this area.

Section 3. Interview Findings

Background

- 3.1 This section contains the findings based on 28 interviews carried out with those responsible for tackling economic crime in the police and other law enforcement agencies, as well as people working in the private and not-for-profit sectors. Additionally, two senior ex-police officers, who were our project advisors, were interviewed.
- 3.2 The purpose of the semi-structured interviews was to identify existing partner arrangements with the aim to tackle economic crime, and to identify learning from stakeholders' experiences of working in these, including any barriers encountered when working together and how these had been addressed. Because interviewees talked about a number joint arrangements they were involved in, it was not possible to attribute their comments to specific schemes/initiatives or to assess the levels of engagement they were involved in for each of those.
- 3.3 Questions were formulated around the following topics: types of engagement, scope of work, levels of engagement by parties, benefits to the police, encountered barriers and methods of overcoming these, any unintended consequences, and the potential of replicating these in different localities.²⁵

Barriers encountered while working together

- 3.4 The findings from the interviews highlighted four main barriers when carrying out joint-working.
 - Different aims, roles and responsibilities;
 - Reluctance to share data and intelligence;
 - Lack of time, resources and skill sets;
 - Mutual mistrust and silo mentality.
- 3.5 Each of these are discussed below.

Different aims, roles and responsibilities

- 3.6 Bringing together different organisations and individuals inevitably results in people and organisations working together while holding distinct objectives, which may or may not align with the collective goals. Identifying collective and aligned goals is crucial to this work, yet its importance is frequently underestimated; or not implemented in practice.²⁶ Stakeholders from public sector and private sector stated that

²⁵ For context, an indication of the sector the interviewee works in is recorded against quotes included in this section.

²⁶ Bullock, K. (2014) *Citizens, Community and Crime Control*. Basingstoke: Palgrave; Prenzler, T. (editor) (2012) *Private Security in Practice: Challenges and Achievements*. Basingstoke: Palgrave. (Reissued as a paperback November 2015); Whelan, C. and Molnar, A. (2019) *Securing Mega-Events*. Basingstoke: Palgrave.

challenges were created by different organisational cultures and ethics; working practices; and decision-making processes.

- 3.7 Even when a shared objectives can be identified, organisations may work in very different ways to achieve a common aim and aligning these different approaches, or how seeing how they can complement each other can be challenging:

'It is difficult to work together in a partnership as agendas don't always align.' (Police/ROCU)

- 3.8 Given the complexity of addressing economic crime, issues around differing aims, roles and responsibilities can be amplified; the diverse number of stakeholders involved, each subject to differing legal and regulatory frameworks, as well as cultural and organisational differences can create a challenging environment in which to work. Additionally, economic crime is a constantly evolving, with new types of offences emerging alongside technology developments. This necessitates that any partners remain adaptable and responsive to emerging threats.

- 3.9 However, some of the stakeholders were optimistic about different sectors and organisations working together, even where substantial difference existed:

'A hundred per cent it can be achieved, even with different aims and priorities. Having professional empathy is difficult, so having better conversations and perspectives together can and will lead to a lot more progression.' (Not-for-Profit Sector)

- 3.10 Others felt that some partner organisations did not want to be held accountable for their contribution in the joint arrangement or to be scrutinised for their decision-making. As one police officer remarked:

'Some (in the private sector) don't want accountability for their actions, whereas the nature of police work is very accountable. We are used to that kind of scrutiny. Some organisations tend to make group decisions so they can spread the blame if something goes wrong and therefore no one person (can be) held to account.' (Police/ROCU)

- 3.11 Similarly, there were seen to be differences in the approach to risk-taking; the police in particular being labelled as generally being 'risk-averse'. This was reflected not just in approaches within different joint-initiatives, but also in the reluctance sometimes found by police when trying to roll out identified good practices to other forces/areas:

'We've tried to push things out to others (forces and ROCUs) but they didn't want to get involved. We've worked with new legislation and tested it, but others are not so keen. They don't want to make those mistakes we did – they wait for someone else to do it and that creates a delay. You can't compel anyone to do the work – sometimes you

need to be exceptionally keen to want to do it.'
(Police/ROCU)

'We all talk about it but the practicalities and the risk aversion of this is big. It ends up on the 'too-hard' pile to do anything about it.' (Not-for-Profit Sector)

- 3.12 In such circumstances, strong leadership and clear roles and responsibilities are vital to move work forward, but frequently found wanting. During the interviews, some, police officers in particular were critical:

'Partnerships the police take part in are often not equal and we end up doing other's work – they don't always have a clear leader and remit. Meetings therefore can become a talking shop.' (Police/ROCU)

'Sometimes working with others is difficult. We go to a lot of meetings and no one is ready to take charge – there's a lack of leadership. You get the police in and naturally we gravitate to chair the meeting. It's like they kind of want the police there to step in – there's a lack of ownership and leadership.' (Police/ROCU)

- 3.13 Sometimes the concern is around the behaviour of specific individuals, particularly in relation to power-sharing, when participating in joint-working arrangements. Some may be used to enjoying considerable autonomy in their own organisations but compromised when partnering with others:

'Empire building is a problem. Issues start when someone starts to lose things that are usually under their control.'
(Police/ROCU)

- 3.14 All of the interviewees, regardless of sector, agreed that communication, both within their own sectors, and between sectors, was of key importance. In particular, they emphasised the importance of being able to understand the messaging and being able to think from the other party's point of view:

'How do we go forward if we can't talk to each other and share things – even acronyms and different terminology. We're all slightly talking different languages at times. We need to get people on the same page and to take time to think consciously and understand how it's going to be perceived their end.' (Police/ROCU)

Reluctance to share data and intelligence

- 3.15 One of the biggest barriers identified to effective joint-working, was the reluctance of organisations to share data and intelligence with each other. The underlying issue here was concern about breaking the law, specifically the General Data Protection Regulations (GDPR), which are

a part of the Data Protection Act 2018 (DP 2018).²⁷ Organisations either felt that the regulations prevented them from sharing (or their perception and interpretation of them did), or they feared falling foul of the regulations, and on this there were many comments:

'Since GDPR came in organisations have got more twitchy. Often this is because of what their legal firms or departments say – they have become much more risk-averse.' (Police/ROCU)

'Organisations are more sceptical about sharing since GDPR. It's a huge challenge getting data into the police, a real minefield and more complex with legal departments.' (Not-for-Profit Sector)

'Some organisations are more than willing to take a point of contact with the police, but there is only so much they can do before they fear they are breaching the law or regulations.' (Police/ROCU)

'Private companies are worried about what comes back on them – Organisation A were worried, but everything was done properly but it was a risk. But many see it as more trouble and hassle than it's worth.' (Police/ROCU)

- 3.16 Stakeholders argued that this had led to a risk-averse culture, with, on the one hand, a police service culturally averse to sharing, and on the other, a private sector concerned about potential commercial consequences:

'Private firms are reluctant to share mostly because it can impede their competitive advantage. Even groups established to share information are often reluctant to share.' (Police/ROCU)

- 3.17 However, others spoke about recognising this challenge and drawing up protocols to address potential competitive issues between private member organisations when working together. As one interviewee said:

'We have a Competition Protocol which supports the work of our partnership, which is by and large how we get round this. It's a voluntary arrangement, we don't exclude people on the basis of preferential treatment, it depends on the operational need. If we need to engage with them and it causes some challenges, we have to balance preserving the partnership. We need to be mindful where we need

²⁷ <https://ico.org.uk/media/for-organisations/guide-to-the-general-data-protection-regulation-gdpr-1-0.pdf>

people involved, that they are a commercial entity.’ (Not-for-Profit Sector)

- 3.18 That said, some took the view that the problem was not the law itself, but the (false) interpretation of it and some pointed to some successes:

‘GDPR rules are quite broad to allow you to share, but lawyers sit there and question if we can rely on them.’ (Private Sector)

‘There are some excellent examples (of sharing) around, but also some very poor responses – even within the same industry sector.’ (Not-for-Profit Sector)

- 3.19 Indeed, there are agencies that have successfully evolved based primarily on the need to share data. Organisations such as Cifas and National Hunter have been sharing data to prevent and detect fraud for many years and they have successfully navigated through various Data Protection laws and regulations over that period:

‘Cifas however has existed for 35 years and has managed to find a pathway through this – so why haven’t others?’ (Not-for-Profit Sector)

- 3.20 It was also noted that part of the problem was a lack of attention to thinking through what could be shared, and to treat all data and intelligence too quickly as the same when it is not:

‘It all depends what you mean by data sharing because there are multitude of levels of sharing.’ (Not-for-Profit Sector)

- 3.21 Although it was acknowledged that there is quite a bit of small-scale data sharing, larger-scale sharing of ‘big data’ occurred much less often:

‘Large-scale data sharing doesn’t really happen across the piste. It is something that is a challenge and largely down to the risk appetite of individual organisations.’ (Not-for-Profit Sector)

- 3.22 In terms of the actual process of sharing data and intelligence, interviewees referred to examples where this occurred, but they found the associated rules governing the process for doing so were bureaucratic and even cumbersome, and this resulted in a reluctance to engage with the process.

‘You can’t just pick up a phone, you need to go through other agencies – maybe even to a local (Police/ROCU)

‘Sharing could put you in hot water and at times is very complex. Only a few (officers) are confident to do this – you need to go to the experts on this but they are spread thinly.’ (Police/ROCU)

'Opportunities are being missed here because of structures and red tape...We're failing the private sector in terms of taking action with this centralised approach.'
(Police/ROCU)

- 3.23 For example, in order for the police to engage in discussions with the banking sector regarding specific matters, officers must undergo accreditation, including examinations and the completion of a relevant portfolio of work which then adds a barrier to engagement. But as one officer explained even that at times is cumbersome and time-consuming to get to the right department that holds the information:

'Banks have boundaries too – which is right and they hold the police to account. But sometimes we have to explain everything in detail to them in stages, each one releasing a legal gateway.' (Police/ROCU)

- 3.24 Furthermore, some argued that the issue lies not in the process itself, but rather in how some individuals respond to and engage with it. Others however, identified that even within the complex regulatory restrictions of the financial sector it was possible to work effectively together with different partners given the right investment and appetite.

'For Production Orders for banks...Initially the system for this was quite frustrating but it is robust and now we get the information which is proportionate to the request.'
(Police/ROCU)

- 3.25 In addition to concerns about breaking the law and/or regulations, the private sector in particular was concerned about potential repercussions from sharing information. These could manifest as legal risks and the fear of prosecution - let alone the reputational damage that could be caused to an organisation and there were viewed as considerable. The following quotes demonstrate these concerns:

'GDPR rules are quite broad to allow you to share, but lawyers sit there and question if we can rely on them – what if we get it wrong and end up with multi-million dollar fines? The punishment for getting it wrong is very high – so the risk is high.' (Private Sector)

'Neither the government, law enforcement, nor the NCA will give you a blank cheque that they won't prosecute you, therefore, why would you share? Organisations need some guarantees.' (Private Sector)

'What if they share information and it was found later that they had been wrong to. Their reputation would be on the line and this could affect their position in the market.'
(Private Sector)

'Imagine the reputational risk you'd suffer for sharing information about an organisation or person and it later

coming to light that there was no economic crime committed.’ (Private Sector)

‘What if we get it wrong and end up with multi-million dollar fines? The punishment for getting it wrong is very high – so the risk is high.’ (Private Sector)

- 3.26 A further issue identified about sharing data was the lack of reciprocity, particularly from the police, something police interviewees acknowledged too:

‘It is easy to share with the police but getting anything back is difficult. There are trust issues and gateways that don’t make it as smooth or as easy as it could be.’ (Not-for-Profit Sector)

‘Sharing data and intelligence is not always reciprocal but sometimes police hands are tied.’ (Police/ROCU)

‘Law enforcement is very poor at sending it (data) back. It’s a one-way mechanism. There’s the fear factor ‘what can we share?’ and we don’t always know.’ (Police/ROCU)

- 3.27 There are two key points here that merit an additional comment. The first is that police reluctance to reciprocate is due to a lack of faith in the quality and even timeliness of data provided to them; and because this is a complex area (for ownership, sharing, sharing, retention and disposal) police reluctance is also due to a lack of clarity about the parameters as to what is permissible:

‘Some financial institutions are good about information... But for others it is not as good. There is little incentive for them to do this.’ (Police/ROCU)

‘Do we ever see the results? We send material – we chase up management – even the big organisations, but in the end we have to leave them to it and move on to another job. By the time something comes back it’s too late.’ (Police/ROCU)

‘By the time data comes back things have moved on. There’s a real delay at times.’ (Police/ROCU)

‘The quality of some data (are) poor and it is not much use just giving lots of data – it is not helpful ... There’s a need to balance what is useable to whatever objective we are trying to achieve.’ (Police/ROCU)

- 3.28 One final point on this was a view expressed that the risks of sharing data quite simply, under present arrangements, exceed the benefits. This applied to all parties to some extent, but the private sector in particular:

‘It is difficult trying to engage the tech companies – it is difficult – there is no incentive.’ (Not-for-Profit Sector)

'What is the risk of not sharing? Nothing. Fraud continues but your personal organisational risk is zero. So, if you were a lawyer, you'd advise not to share.' (Private Sector)

Lack of time, resources and skill sets

- 3.29 It is somewhat ironic that a barrier to police harnessing the value in the private and not-for-profit sectors was a lack of resources to do so. This sometimes prevented engagement altogether and at other times limited what could be achieved:

'It (investigating economic crime) is complex and time consuming, therefore we won't form many partnerships.'
(Police/ROCU)

'There's the lack of time and resources to pursue all organisations we'd like to.' (Police/ROCU)

- 3.30 Some pointed out that for a good joint engagement idea it was possible to attract specific funding to get an initiative underway, but this was difficult/time consuming to obtain; and the funds provided were often for limited time periods:

'Central or Home Office funding usually lasts about two years, which is okay for an initial idea, you can set it up but to be honest not much more. You need consistent funding.'
(Police Officer)

- 3.31 Collective partner arrangements that were paid for by industry were sometimes viewed as gold standard examples. From a police perspective, this meant that they could devote resources to tackle a specific problem to an extent that would otherwise be impossible.

'Let's be honest, we exist simply because we are paid for by industry...but they do get more back than they pay out.'
(Police Officer)

- 3.32 Moreover, it signalled that the private sector cared about the problems, its products and services created. The key is showing a positive rate of return on investment to parties, something which some senior police struggle with:

'Police resources can't do everything; the private sector needs to pay but not all senior police leaders have seen this yet. We need to have some blunt and difficult conversations with the private sector.' (Police/ROCU)

- 3.33 The lack of resources applied to more than money. Another irony is that sometimes the police struggled to identify the gaps in their own skills, and where they were able to bring people on board, providing equipment and access to data was complicated too. The police also want to make use of the latest technologies and keep up to date with the potential offered by the digital age, but often lacked know-how:

'Police lack skills on the digital side, especially data and analytics and they certainly haven't got their heads around data – big data – especially algorithmic solutions to understand risks better like for example retailers have.'
(Private Sector)

'You get data overload and making sense of it is difficult and the police are not good at this. There is good data around but no one seems to be able to bring it together.'
(Police/ROCU)

- 3.34 Another complication was the police being impartial and crucially being seen to be impartial that working with one supplier over another could result in accusations of bias:

'The police would like to benefit from technology but could be accused of favouring a supplier if they choose one technology. Often technologies are often complex so how can sharing work?' (Police/ROCU)

- 3.35 At least one interviewee felt that the problem here did not just relate to resources, but also because the police fail to look at economic crime in a different way to more traditional offences:

'Institutionally we lack innovation. We understand partnerships with obvious risks (threats to lives), but not how partnerships could make us more efficient in our day-to-day work. It's even harder for economic crime because we have moved away from our traditional threat, harm and risk model...if it doesn't bang or bleed (we're) not interested.' (Police/ROCU)

Mutual mistrust and silo mentality

- 3.36 Trust was considered by many as a cornerstone of working together, and it is therefore instructive to examine the reasons for its absence. Certainly, not all police officers were enthusiastic about involving the private sector in tackling economic crime. Concerns here focussed on the widely discussed distrust of the motives of the private sector. Attention was directed towards the different philosophies of the public sector on the one hand (geared to serving the public good) versus that of the private sector on the other (geared to generating profit):

'No law firm would investigate their own client.'
(Police/ROCU)

'If law firms took this on, working for the state to uncover funds on commission...Would it generate a trust issue?' (Police/ROCU)

'Lots of private consultancies and accountants and ministers who thought they [the private sector] were the

answer to asset recovery problem...but it never really happened.' (Private Sector)

- 3.37 Stakeholders from both the private and public sector also identified trust issues based on specific experiences joint-working that had not worked. An interviewee working in the private sector spoke about a situation where a law enforcement agency declined to provide feedback to an online retailer about an organisation they were investigating, thereby allowing the retailer to continue selling (potentially counterfeit) items through their website supplied by this organisation:

'Law Enforcement A refused to advise us when counterfeit goods were seized. They said that their legal teams prevented them from sharing information to anyone other than the product owners. Therefore, we potentially continue to sell counterfeit goods to our customers.'
(Private Sector)

- 3.38 Conversely, the Banking Protocol²⁸ has established procedures and guidelines for financial institutions to follow, aiming to prevent and respond to various economic crimes and safeguard the integrity of financial systems. Whereas there have been some excellent examples of organisations working with the police (refer to case studies Appendix B), some institutions did not always welcome working with them, in particular banks:

'They [banks]do not want the police in their branches or even our literature. They think that the customers won't like it.' (Police/ROCU)

'Some financial institutions want to keep their training as it is – but we argue, "it's not working".' (Police/ROCU)

- 3.39 One interviewee went even further about the state of the relationship between some banks and the police:

'Some branches have been really stand offish – they don't feel they get a lot support for the Banking Protocol. They do a referral and the police don't turn up or come three hours later or just have a quick conversation with victim. There is a distrust – the relationship is fractured and some of this is just about rebuilding trust. We need re-engagement of local forces and feedback that this has been really useful. They need to know they can just ring and get response.' (Not-for-Profit Sector)

- 3.40 The police themselves admit that sometimes the only way to access certain organisations is by partnering with another agency that is more

²⁸ The Banking Protocol is an industry initiative led by UK Finance, where bank staff are trained to spot when a customer is about to fall victim to an authorised fraud and work with the police to convince them not to make the payment.

welcomed by the organisation. As one officer summed up his experience with organisations who did not welcome the police:

Some banks do not want a police presence – there is much distrust. Sometimes getting to speak to them involves going to another agency and then then we can tag along too.’ (Police/ROCU)

‘We have been successful because there are two brands in the partnership and one of them is not the police’ (Police/ROCU)

- 3.41 Some were also concerned about what a successful private sector operation might do for trust in the police. However cynical this may appear; it was very real:

‘If the private sector is successful, what does that say about public services? The perception is that it will put the public service in a bad light.’ (Police/ROCU)

Summary

- 3.42 A number of challenges were identified by those working in organisations that have partnered with others (including the police) to tackle economic crime. These challenges include aligning organisations with disparate goals towards a shared objective; recognising the importance of using a common language to facilitate effective communication and understanding among participants; and navigating data and intelligence sharing within the framework of GDPR regulations. Additionally, impediments such as time constraints, skill deficiencies, and entrenched silo mentalities obstruct seamless working arrangements. The key to progress is to manage these barriers and that requires more focus.

Section 4. Case studies

- 4.1 Through interviews, literature reviews, Internet searches, and examinations of award submissions,²⁹ the case studies (refer to Appendix B) have been compiled, detailing various types of engagement formed to tackle economic crime.
- 4.2 The selection criteria were based on whether this engagement demonstrated 1. good practice and/or 2. it could be replicated for other specific types of economic crime or in other local or regional areas.
- 4.3 For each scheme, we explored its background including the initial need justifying its existence, how the group was formed, who initiated it, details of the parties involved, and the overall aims and objectives. Barriers that were encountered are highlighted, along with potential remedies to them. Finally, we provide details on what was achieved, whether aims and objectives were met and any future plans.³⁰
- 4.4 The schemes selected for case studies were:
- Derbyshire Constabulary – working with local banks;
 - Sussex Police – supporting scam and romance fraud victims;
 - National Hunter – sharing data and intelligence;
 - Tenet Law – creating volunteer opportunities with students;
 - Regional Fraud Forums – uniting counter fraud professionals.

²⁹ Specifically, entries to the Tackling Economic Crime Awards (TECAs) <https://thetecas.com/>

³⁰ It should be noted that because this project is a limited scoping study, we have not carried out a full evaluation of case studies and therefore, our comments here are based on identifying issues which may merit further research.

Section 5. Discussion and Summary

- 5.1 Economic crime has risen to epidemic levels, the police response to it has been under-resourced and slow, and the devastating impact on the country, communities, businesses and individuals are only slowly being fully recognised. Encouraging the government to draw on different sources of help – not least where costs may be minimal – has much to commend it. The Conservative Government’s Fraud Strategy, published in 2023, promoted the value of industry engagement to counter fraud (albeit with no account as to how this would be carried out). Although the new Labour Government has yet to outline in detail its plans, early indications are that it is committed to seeing the issue of fraud as a political priority.
- 5.2 Our scoping study has identified a wealth of resources and expertise that are currently not fully utilised by the police. Considering the various pressures on resources and the criminal justice system, it is evident – and widely recognised - that we will never arrest our way out of fraud (albeit it remains an important element of the police response). It is time to think more creatively about how we approach tackling it and ask some challenging questions.
- 5.3 We have, by mapping what is currently offered, provided a reference resource for the police. This accessible compilation of the various types of initiatives that can support different purposes and achieve different aims is freely available to all: <https://perpetuityresearch.com/mapping/>
- 5.4 We are keen to emphasise that not all forms of engagement are the same and some types may present ‘easy wins’ in that they may require minimal police involvement but can have a considerable impact.
- 5.5 We have identified four types or levels of engagement which we refer to as ‘Awareness’, ‘Cooperation’, ‘Collaboration’ and ‘Partnership’. These are more than just descriptive labels in that they have a real meaning for policing; when moving to a different type of engagement, different possibilities, each requiring potentially more coordination and effort are encountered.
- 5.6 The opportunities we identified cover diverse areas of work, highlighting the different ways in which engagement could benefit the police, these include:
 - Detection and Investigation;
 - Disruption and Intervention;
 - Awareness and Campaigning;
 - Education and Training;
 - Professional Development and Networking;
 - Sharing Data and Intelligence;
 - Victim Support;
 - Volunteer Opportunities;
 - Asset Recovery (more for the potential than the reality).

- 5.7 Yet, there are barriers that will need to be managed. Identifying and tackling these is a prerequisite to unlocking the potential of the initiative in question and developing a meaningful aid to the policing of economic crime.
- 5.8 The first barrier relates to the traditional difficulty in bringing different organisations together namely developing a joined-up and aligned set of objectives that are deliverable for all parties and are consistent with each stakeholder's remit and priorities. Often, initiatives are driven by dynamic leaders and/or committed individuals in key positions, which can become a weakness if, for some reason, they leave or curtail their commitment.
- 5.9 A second major barrier concerns the reluctance to share data, not due to doubts about the benefits this generates but because of concerns about the risks and consequences of contravening the GDPR regulations. This is true for all parties, not just the police. Yet, some parties have navigated these hurdles successfully and are sharing data. There is an opportunity to learn from the best practices here.
- 5.10 A third barrier focuses partly on the demands on time and resources that engagement can require, but also on the lack of skill sets available. Providing reference points and promoting good examples are a starting point, supplemented by a training scheme that can fill the current gap.
- 5.11 Finally, we referred to the barrier posed by the somewhat traditional mistrust that exists between different sectors, epitomised in the commonly held view among police officers that the private sector is primarily motivated by profit, while the police are motivated by public service. This fuels the silo mentality that abounds. Our aim has been to show that there are plenty of exceptions. Further work might usefully highlight the benefits that accrue to the different stakeholders involved in different types of initiatives; that way we may begin to provide a more informed base for encouraging replication. It is not just the police who benefit, we have seen that society does too.

Section 6. Recommendations

Longer Term

6.1 The finding

We found that the effective sharing of data and intelligence are fundamental, to the ultimate success/value of the engagement, and/or to it fulfilling its potential. The problem is that GDPR requirements, and attitudes towards them, serve as a barrier to joint-working, for all partners. Yet, this research has shown that others have successfully navigated legislative requirements.

The recommendation:

That research is conducted to better understand the precise problems encountered in sharing data and intelligence; to learn from those who have overcome these difficulties and provide a reference document – with illustrative examples – to guide economic crime practitioners.

6.2 The finding

There is enormous untapped potential in meaningful police engagement with key partners in tackling economic crime. A key gap is any systematic understanding of those agencies that the police feel offer the greatest potential to help them.

The recommendation:

Work is needed to identify those agencies the police would most like to engage with (such as technology organisations); understand the type of engagement required; determine what input they would like from those agencies; and the barriers to initiating joint-working and the steps needed to overcome them.

6.3 The finding

Some private or not-for-profit sector organisations have the resources to conduct investigations into economic crimes committed against them. However, many report that when they present their case files to the police they are ignored. The police have expressed a variety of concerns. The net result – which both sides recognise and lament – is a high level of frustration and an enormous, wasted opportunity.

The recommendation:

Where organisations have the resources to conduct their own investigations into economic crimes committed against them, further work is needed to explore; the types of cases that offer the greatest potential; the specific flaws that undermine police faith in the process; the potential routes to rectifying these, including the potential of an accreditation system, and/or the setting of recognised standards.

6.4 The finding

There appears much value in industry-funded engagement schemes set up to tackle economic crime, for some police officers they were seen as the gold standard. At present these mainly operate in the banking and insurance sectors.

The recommendation:

Work is needed to better understand how industry-funded initiatives can be set up to tackle economic crime and how these can be presented to other sectors/groups beyond banking and insurance sectors, for successful implementation.

6.5 The finding

Volunteers have the potential to generate an enormous amount of work and add significant skills sets but engaging them meaningfully – not least in the set-up stage – is not trivial.

The recommendation:

An aide memoire is needed to guide police units working in different areas of economic crime on the best ways of engaging and deploying volunteers, clarifying the key areas they can work in, the types of agencies they can engage with, and examples of what has worked and not worked.

6.6 The finding

We found that different stakeholders derive different benefits from participating in joint-working arrangements, although insights into these are incomplete. If they were better known and understood, they could be utilised to highlight the value of participation and encourage more parties to consider engaging.

The recommendation:

To research the key benefits derived by different parties working together; to articulate the types and forms of engagement that will best result in achieving and replicating these benefits. The output would serve as a guide to maximising the benefits of engagement.

6.7 The finding

There have been few, if any evaluations of 'what works?' in the specific area of economic crime and little is known about cost-effectiveness.

The recommendation:

Evaluation is required to see what works and what does not. This could be undertaken in two parts: first, as a general assessment, and secondly, to focus on the cost-effectiveness of some schemes.

Shorter Term

6.8 In the shorter term, police forces and those engaged in tackling economic crime, for 'quick and easy wins' should:

- Liaise further with private and not-for-profit organisations who provide evidential files for investigations in order to clarify requirements, to enable the police to maximise the use of this external support.
- Review police volunteer schemes in operation to ensure that they are operated to achieve optimal benefit, for example by extending the skillsets available to tackle economic crime. Additionally to understand how they are funded and resourced.
- Adopt Op Signature principles and work with relevant agencies to implement these and expand to any related further needs of their population (such as support specific type scams).
- Engage with financial institutions (banks, credit agencies, Post Offices etc) and those services who come into contact with vulnerable economic crime victims, to establish and then implement best practices.
- Work with local Regional Fraud Forums in order to network and identify further opportunities to work together.
- Approach local law firms, universities and law colleges to explore the feasibility of setting up pro bono schemes to provide law students with practical experience and the opportunity to help the police in providing legal advice/support to victims of economic crime.

Appendix A – Methodology

Background

This study adopted a mixed methods approach. It was a scoping study, designed to explore issues that will then merit further investigation.

Evidence review

To acquire a thorough comprehension of the research context surrounding those engaged in working together to tackle economic crime, and to inform the interview schedule, a literature review was conducted. The objective was to investigate the primary issues concerning what constitutes successful engagement, the barriers encountered when various parties work together, and potential strategies for overcoming these challenges.

Mapping existing opportunities with the private and not-for-profit sectors

A desktop analysis examined the landscape of existing partners working together within both the private and not-for-profit sectors to tackle economic crime. This involved mapping engagement details (such as parties involved, size of group, police involvement etc.) onto a spreadsheet. From this, functional typologies were developed which facilitated the identification of case studies.

Interviews with those engaged with others to tackle economic crime

The participants included individuals engaged in detection, investigation, prevention, and various other specialist areas of tackling economic crime. The engagement process encompassed both formal and informal methods and 'snowballing'. We reached out to individuals: already known to the research team and our networks; recommended to us by the two Project Advisors; and the City of London Police (CoLP) sent out requests on our behalf to all ROCUs and economic crime leads in police forces.

The majority of interviews were conducted online (with some take place at conference and other networking events). Typically, the interviews lasted at least one hour and were semi-structured with questions drafted on insights generated from the evidence review. One advantage of using a semi-structured approach is that it offers flexibility to the interviewers, enabling them to delve deeper into issues.

Findings from the interviews were subjected to thematic analysis, by familiarising with the responses provided, coding the data according to emerging ideas and creating categories through comparison of the responses. The report findings were then structured around these emerging themes. We interviewed 28 people in total, made up of 17 police officers and 11 individuals from the private and not-for-profit sectors. We also engaged in many informal conversations with those we met and showed interest.

Limitations of research

It is important to recognise the limitations of this project. Because this was a small-scale study not all groups engaged in tackling economic crime could be mapped, and only a limited number of stakeholders were consulted. Therefore, those interviewed may not be fully represent the diverse range of organisations involved in such arrangements. Additionally, their views were personal to them and not necessarily those of the organisations they represented. Moreover, although we have commented on perceptions of effectiveness, we did not conduct an evaluation, the study was too limited for that. Our study was aimed at generating new insights into a topic considered important but universally recognised as having been under the radar.

Appendix B(i) – Derbyshire Constabulary

Name: Derbyshire Constabulary and local banks

Functional typologies: Awareness & Campaigning; Training & Education

Specialist area: Financial system frauds

Number of partners: 2 in each joint arrangement

Contact: Tammy Barnes tammy.barnes@derbyshire.police.uk

In late 2019, Derbyshire Constabulary noted an increasing number of victims suffering financial losses from financial institutions and that fraud prevention provided by the banks ineffective. Recognising this need, the police approached the local banks and started work with the Nationwide building on existing good relationships. Building on this success, they started to engage with HSBC and the CoOp. Although Covid-19 delayed their work, work in local branches began with coffee mornings and in later evolved to include the provision of training.

The Banking Protocol is a UK-wide piece of legislation that compels staff in financial institutions to ask customers questions when they try to transfer money (either paying it in, withdrawing it, or paying someone) and in some instances to record their response. What Derbyshire Constabulary found however, was that banking staff asked generic and 'tick-box' type questions of those they thought were potentially vulnerable to financial fraud. It was felt the wrong questions were being asked, issues were not being fully pursued, and some customers did not understand what they were being asked or why. The police felt that banks were naïve about the amount and type of grooming and manipulation a victim (a customer) could be subjected to.

Training and education sessions were held with branch staff to highlight how victims might present at the bank and how to ask more probing questions. For example, if they were told that the money was for building works, staff were encouraged to engage in further conversation to enquire whether a number of quotes had been obtained, how they had found their builders, whether they had a payment plan and also to ensure they pointed out that they did not have to pay in cash and that a bank transfer could be used. Derbyshire Constabulary believe from the feedback they have been given on these sessions gave bank staff more confidence to interact with customers to highlight potential frauds.

The primary challenge faced by Derbyshire Constabulary was that banks wanted to undertake their own internal training. This was despite the police seeing its limitations and regarding it as ineffective because to date it was failing to identify vulnerable customers. The police felt that it was more aimed at protecting the bank brand and reputation. Banks initially did not want a police presence in their branches, including police some seeing this as a negative and felt that this was not good for their image. Therefore, the police worked with branch staff to understand what questions were asked of potential vulnerable customers and made suggestions as to how these could be improved. Most

branches accepted the offer of police education and training, though this was embraced to varying degrees.

The view was less that the police added expertise to these joint-working arrangements, rather they provided a different way of thinking about and framing questions to customers about money transfers. The banks knew more about money transfers but the police had greater intimate knowledge about grooming and manipulation. The police helped banks understand why customers may be pressurised to transfer funds and gave ideas as to how customers might see such questioning as helpful to them rather than an impediment to doing business.

Derbyshire Constabulary claim there is some evidence that the results of this local joint-working local have been positive, in that they have noted an increase in telephone referrals from the banks where staff suspected a problem. Moreover, Derbyshire Constabulary has observed a decrease in financial loss for victims. They also believe that as a result of police training and education, bank staff have acquired more confidence in dealing with potential victims and vulnerable people and have become more proactive in challenging suspicious transactions.

According to Derbyshire Constabulary they identified the following benefits: more victims identified as vulnerable; more money saved and bank staff more confident in challengingly potential vulnerable customers. They continue to work with their local banks and review call data daily to get a better picture of what is happening in their area, alert banks of current criminal trends and suggest the type of questions they should be pursuing with customers.

In a separate drive, Derby Constabulary, firmly believing that awareness and education is key to tackling fraud and scams, have produced a number of short light-hearted videos with the help of students at Derbyshire University, under their 'Sock it to the Scammers' initiative.³¹

Because Derbyshire Constabulary believes in the success of their work so far with local banks, they wish to pursue similar joint-working arrangements with further local banks and hope to bring further branches on board. They also aim to engage with other financial institutions, such as the Post Office, currency exchanges and other organisations that can send money abroad in order to raise awareness of scams and offer education, training and support to their staff. In addition, they wish to work with other organisations that may come into contact with vulnerable individuals where they may share their concerns, including the beauty and hair industries, Uber taxis and Age UK.

Clearly this issue is not exclusive to Derbyshire Constabulary, so there is enormous potential if the evidence of success is proven through thorough evaluation, that this type of joint engagement is replicable in other police forces/districts working with similar financial organisations.

³¹ <https://www.derbyshire.police.uk/police-forces/derbyshire-constabulary/areas/derbyshire-force-content/campaigns/campaigns/2023/sock-it-to-the-scammers/>

Appendix B(ii) – Sussex Police

Name: Operation Signature

Functional typologies: Awareness Raising & Campaigning, Education & Training; Victim Support

Specialist area: Scams and Fraud

Number of partners: Police and numerous other local services

Contact: Bernadette Lawrie Bernadette.lawrie@sussex.police.uk and Lisa Mills Lisa.Mills@victimsupport.org.uk

Operation Signature is a standardised reporting and recording process which seeks to identify vulnerability at the first point of contact and provides preventative and support measures to protect victims from being further targeted. It was introduced after the force identified a national gap in support culminating in a proposal to the PCC for funding which was granted.

The aims of Operation Signature are to ensure that Sussex police:

- Deliver an excellent quality of service to vulnerable victims of scams and 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 reducing the risk of repeat victimisation;
- Available investigative opportunities are identified and pursued locally;
- Disruption opportunities are recognised and maximised.

In 2016, following funding approval, the scheme was established in collaboration with Victim Support. Two case workers dedicated to supporting vulnerable fraud victims were added to the Victim Support team. Other agencies involved those also may come into contact with individuals vulnerable to scams, including Age UK, Adult Social Care, and the Fire and Rescue Service. All of these entities have undergone Operation Signature training run by the police and awareness initiatives through a concise 3-minute film titled 'Fraud and Scams – Know the Warning Signs.'

In 2017, the scheme was presented to the NPCC. It was approved as best practice and disseminated to all police forces. In 2020, after identifying that victims of romance scams desired a safe space to share their experiences with similar victims, the first romance fraud victim support group was established. A similar romance victim support groups have been set up with Essex and Avon and Somerset police forces.

The service across Sussex generated approximately 1200 referrals in 2023, with around 900 victims engaging in at least one contact with a support officer.

Through joint efforts, the officers claim approximately £700,000 was recovered in 2023.

From a police perspective, this service means that victims can get support beyond what the police could normally provide. Victim Support claims it provides victims with a friendly service and a designated telephone number that they can utilise if and when they are ready to engage with support. Additionally, they claim that it has empowered victims to access a variety of support services, bringing together previously fragmented services under this initiative.

In a different way, there is an increased focus on addressing romance fraud evidenced by securing £0.5 million from Lloyds Bank for Project Olaf. This funding aims to facilitate the development of a south east hub, encompassing London, Kent, and Sussex to create a peer support group.

The adoption of Operation Signature is an example of an idea that has evolved and been developed. Those involved in this arrangement believe that their success hinges on recognising and promoting the strengths of bringing together different entities with different skills sets with a united focus that, against a distinct set of victims, in a way that was comparatively easy to implement.

Appendix B(iii) – National Hunter

Name: National Hunter

Typologies: Sharing data & intelligence; Disruption & Intervention; Investigation & Detection

Specialist area: Mortgage application fraud

Number of partners: 5-10 information sharing partners

Contact: Alex Hansen alex.hansen@nhunter.co.uk

National Hunter is a not-for-profit member organisation formed in 1993 with the aim of member organisations combining to prevent fraud and protect victims of fraud. The primary goal is to reduce member losses by identifying fraud at the application stage and this is achieved by sharing application data at a national level, and returning matches to members that might be worthy of investigation.

National Hunter is a Specified Anti-Fraud Organisation (SAFO), and as such has a legal gateway to share information with government agencies for fraud prevention purposes as detailed under Section 68 of the Serious Crime Act 2007.³² They process over 20 million applications a year across a range of business sectors via the Hunter software system designed by Experian. Data is contributed from:

- Commercial finance
- Credit cards
- Current accounts
- Merchants services
- Mortgages
- Motor and asset finance
- Savings

Information sharing partners include National Anti Fraud Network (NAFN), The National Vehicle Crime Intelligence Service (NaVCIS), Financial Conduct Authority (FCA), and the Solicitors Regulation Authority (SRA).

The information held on the National Hunter database consists primarily of the information provided by member organisations from individuals who apply for a financial product from the organisation who submits data to them. The database does not hold any credit scoring records, credit histories, information concerning County Court Judgements (CCJs) or bankruptcies, nor do they store Electoral Roll information.

The application information held is used to help financial organisations determine whether the information contained within the application form is accurate. If it is not accurate, this might be an indicator that the person making

³²

https://assets.publishing.service.gov.uk/media/5a7f656f40f0b62305b86e4f/Data_Sharing_for_the_Prevention_of_Fraud_-_Code_of_Practice_web_.pdf

the application is attempting to commit fraud, or that someone is attempting to impersonate an innocent person.

The process for checking data submitted is summarised by the steps detailed below:

1. Application data submitted from member organisation system
2. Data processed within rules engine
3. Matches generated and returned to member organisation
4. Applications compared side-by-side
5. Investigated where appropriate, and decision made
6. Status type amended, if appropriate

Typical rules that can be used to detect any abnormalities or inconsistencies in the data are:

- Use of the same email address, different person and address;
- Use of the same person, different employer;
- Use of the same person and address as refer status application;
- Use of the same telephone number as inconsistency status application.

In addition to the data sharing and matching service, National Hunter offers a number of other value added services to prevent and detect fraud including: a Search and Alert Facility (SAF), which includes targeted cross-sector investigations, triggered by intelligence and carried out by an experienced National Hunter investigator; compliance audits and guidance; member statistics; secure online member area; training; annual conference; and working parties.

There have been instances in the past where some organisations have been reluctant to share intelligence and/or data, either because they were afraid of falling foul of the law or other regulations, or because they feared it might put them at a commercial disadvantage which have now been overcome. In addition, not all partner organisations are not-for-profit. Additionally, the high number of individual police forces is viewed as a barrier to coordinating investigations; a longstanding lament.

National Hunter claim that in 2022, on the detection side, they saved £66 million from over 4,000 intelligence reports received. Whereas on the prevention side, they received over 20 million unique applications in the year, of which 900,000 (4.5%) were non-clear applications, which they estimate prevented £1.8 million worth of fraudulent applications, They claim that 1 in 12 applications result in a match and highest single saving to date from one report is £14 million and the record for the highest multiple saving from one report is £5.6 million.

This type of engagement demonstrates how data and intelligence sharing can help prevent and detect economic crime. It is potentially replicable in other financial and non-financial areas similar to what Cifas undertake as a similar not-for-profit data and intelligence organisation. Both organisations have managed to plot a route through the ethical and legal complexities of data including navigating any issues raised through Data Protection laws.

Appendix B(iv) – Tenet Law

Name: Tenet Law and University of Birmingham

Typologies: Volunteer Opportunities; Victim Support; Awareness Raising & Campaigning; Education & Training

Specialist area: Consumer fraud

Number of partners: 2

Contact: Arun Chauhan arun.chauhan@tenetlaw.co.uk

Founder and director – Arun Chauhan – is passionate about supporting the victims of fraud, especially those who cannot easily access legal services. He set the practice up in 2016 and since 2021, it has been a partner of the University of Birmingham’s Law School and Pro Bono Group.

Arun reached out to the University in 2020 and pitched his idea of allowing students to obtain some real hands-on experience in fighting fraud. The intention was to help students by familiarising them with the complicated legal area of financial crime, helping them to understand how the law works in practice, an enabling them to obtain new skills (such as getting clients to trust a legal advisor).

A number of strands to the initiative were developed and the first involved students creating educational videos – initially on money laundering and crypto currency and later on Non-Fungible Tokens (NFTs) and employee fraud.

Tenet then encouraged the Law School students to help people online. The first case they were involved with related to a lady who had been wrongly accused of abusing a train refunds scheme and given a fine. She had not received any support from British Transport Police and they could not give her any information. The students researched the flaws in the arguments (beyond what other support agencies such as the CAB could do) and successfully fought the case for her.

In 2022, guided by solicitors at Tenet, the Law School students embarked on StreetLaw, a project that involved creating and delivering interactive legal education to local schools and other community groups to help them understand the law and raise awareness of their legal rights and responsibilities. The students offer pro-bono legal advice to individuals, charities and small businesses to identify, prevent and respond in the event they have been targeted or become a victim of fraud.

The biggest challenge to Tenet was that second-year law students had never undertaken any crime interviews or written letters of advice so the starting point was low; but with perseverance and joint commitment success was achieved.

Tenet believe this to be the first pro-bono fraud advice scheme established with a university in the UK providing an opportunity for the next generation of lawyers to advance in their career. They hope to replicate it each academic year.

The project has also helped raise awareness of 'Money Mule Fraud', a problem across Birmingham's student communities³³ via awareness sessions run by the students. Tenet believe this work has both educated and prevented money-muling and The Street Law Money Mule project was nominated for the CSR Initiative of the Year in The British Legal Awards 2022 and also won the Tackling Economic Crime Award for Best Partnership in 2023.

One of the issues that Tenet has is how to market their initiative without overwhelming their and other voluntary resources. They feel that this model can be easily replicated with similar organisations, therefore, they want to encourage other law firms to partner with their local university to develop similar models. They have already sent out a LinkedIn post to promote this and are looking to engage with key players in main cities like Leeds, Manchester, Cardiff and London etc. to set up a call and pitch their ideas to. They have also had some interest from a law firm in Portland, US to set something similar up there.

This type of engagement demonstrates what other similar organisations can achieve. Voluntary schemes of this nature offer invaluable benefits to the police at no cost, by amplifying efforts to combat economic crime and raise awareness of the risks and dangers. By engaging with such schemes, the police gain access to additional resources and expertise, allowing them to extend their reach within communities. In short, they play a pivotal role in the police's capacity to address economic crime while fostering a stronger sense of resilience and awareness among the public.

³³ A money mule is a person who transfers stolen money on behalf of others, usually through their bank account and could face criminal charges for money laundering

Appendix B(v) – Regional Fraud Forums

Name: Regional Fraud Forums

Functional typology: Professional Development and Networking; Education & Training; Awareness Raising & Campaigning

Specialist area: All frauds

Number of partners: 9 regional forums and over 1000 members

Contact: Robert Brooker Robert.brooker@me.com

Background

The nine Regional Fraud Forums are not-for-profit membership organisations - some were established over 15 years ago - with the goal of uniting counter-fraud professionals from both public and private sectors to combat fraud in a region. These forums serve as a platform to increase awareness of the latest fraud types and trends, foster joint-working, and facilitate the exchange of ideas, knowledge, tools, and best practices.

The UK Fraud Forum (UKFF) is an inward facing body established in 2023 as an overall strategic organisation to support the regional forums and help to recruit and retain members. Their strapline is 'Nine Reasons, One Purpose', the work together and are not in competition with each other. They are:

- London Fraud Forum
- Midlands Fraud Forum
- Eastern Fraud Forum
- South West Fraud Forum
- North West Fraud Forum
- North East Fraud Forum
- Yorkshire and Humberside Fraud Forum
- Wales Fraud Forum
- Northern Ireland Fraud Forum

Each forum has its own board and management team. All send out social media posts and have websites that contain information and news on local and national fraud issues where members can access expert insights from government, law enforcement, and practitioners, enabling both knowledge-sharing and networking. In person or online events include breakfast meetings, seminars, masterclasses, and annual conference.

All regional fraud forums work closely with their local ROCUs and the North West Fraud Forum in fact is led by the local ROCU Business Resilience team. Some have sparked other initiatives such as the Midlands Fraud Forum and Insolvency Service creating thirteen videos for their #IFONLY fraud awareness campaign,³⁴ undertaken with help from students at the local university.

³⁴ <https://www.midlandsfraudforum.co.uk/page-18227>

Appendix C – Further comments from our Project Advisors

This research casts a light onto a complex challenge - how best to utilise the skills experience and resources of both law enforcement and the range of other organisations to tackle the key crime challenge of the decade - fraud, driven by the ease of doing criminal business online. The report has acknowledged the range and success of a variety of initiatives that are delivering benefits, but for a myriad of reasons cannot get the support or visibility to scale and translate local success into national shifts in fraud. As a former police officer involved in tackling fraud, I recognise many of the issues raised, but like many others working in the sector, had limited time and capacity to thoroughly identify, assess and evaluate all the good work going on. This research starts that process. The recommendations, collectively, if implemented, would assist operational teams in both public and private sector to be efficient in adopting initiatives and capability that work, that have already identified the blocks to success and the ways to overcome them. Can policing afford not to progress this work? I would say not. The volumes of fraud now threaten to absorb as much resource policing chooses to apply to it, but with other pressures, this will remain wholly inadequate. This offers another way, a new way to address a new threat.

Ian Dyson, QPM – Former Commissioner of the City of London Police

The police service of England and Wales (you might prefer to say 'UK policing but for HMG involvement and any government strategies etc, it is only England and Wales), works in an increasingly complex, challenging and transnational world. Crime does not look the same as a generation ago, fuelled by the opportunity of globalisation, technology and the ready movement of people, money and criminal capital. The mission continues to widen and despite some recent short term increases in police numbers, the wider cuts from the austerity years mean the service remains smaller and more stretched, unable to address criminality whilst providing security, visibility and public confidence. 'Traditional' crimes such as burglary, car crime and shoplifting are increasing, but at the same time the service is seeking to deploy scarce resources to huge areas of threat and demand such as Child Sex Abuse, Violence against Women and Girls, public disorder and protest and the accepted national threats of terrorism and organised crime. Set against this is the enormous challenge of fraud and financial crime, historically seen by some as victimless, but now better understood as the greatest single risk to the state, to business and to the citizen. In dealing with any crime type, the police service does not and should not act in isolation. Policing works with partners at every level, from the neighbourhood upwards, but a generation on from the Crime and Disorder Act that placed local partnership working on to a statutory basis, the reality is that with some exceptions, joint working, shared understanding of risk, shared agendas and true partnership collaboration has not been properly developed for the wider benefit of the state and the citizen.

Fraud and financial crime is amongst the most common but also the most diverse and complex types of criminal behaviour. The offending can be face to face but is more normally 'virtual'. The offending can be aimed at mass individuals or be specifically targeted, but can also be against organisations, public bodies, small companies, global giants and national institutions and departments. To add to the policing challenge, identifying where the offending took place, where the investigative opportunities lie, what data is available and of use, how to engage with partners, other law enforcement bodies and how to secure evidence from overseas jurisdictions add to the complexity of the work, the difficulty of identifying 'ownership' but also the absolute necessity to work in some form of partnership.

This research report shines an important light on the how the police and partner UK law enforcement agencies might improve the overall response to the threat of fraud and financial crime. Enforcement is but one part of the necessary response and all professionals working in this area and a mass of published research is clear that the country will never 'enforce its way' out of the problem. Policing, partners, the prosecution and criminal justice system and the prison estate is already stretched to breaking point. Along with better enforcement and the targeting of resource against the greater risk, there has to be a focus on better intelligence, education and critically, prevention.

The report recommendations provide a framework on which to build. They highlight the opportunities and parallel challenges of working in partnership – not only in the public and law enforcement sector, but with private industry and the third sector. The report extols the value of volunteering, of joint tasking, of more routine and eventually the industrialised sharing of data, but all underpinned by a shared ethos of challenging the criminal and protecting the victim. All of this requires leadership. Leadership comes in many forms but as with the Crime and Disorder legislation of 26 years ago, HMG has a clear responsibility in terms of resource, legislation, strategic direction and of bringing together those who can ultimately lead, guide and drive this work.

It is wholly wrong to see the problem of fraud and financial crime as simply a policing one. It is a whole system, national and international problem and as technology continues to develop, so will the opportunities for the criminal working in this area. Policing however remains the key and most visible partner who the public are most likely to reach out to at their time of crisis and victimisation. Policing, through the National Police Chiefs Council, the College of Policing and the Association of Police and Crime Commissioners, all have the opportunity to consider this report alongside all the existing strategies, reports and research documents and seek to put the public and the victim first in looking for a new and shared approach to the problem that all recognise.

Mick Creedon - Former Senior Police Officer

About Perpetuity Research

Perpetuity Research is a leading research company with wide expertise in both quantitative and qualitative approaches. We have been extensively involved in studies relating to economic crime including the fraudsters' perspective, staff dishonesty, the links between fraud and organised crime, tackling fraud in the public sector, issues in respect of the reporting of fraud, and the police response to fraud. Our clients include businesses, national and local governments, associations and international organisations as well as charities and foundations. Our aim is to exceed their expectations and it speaks volumes that so many have chosen to work with us repeatedly over many years. We are passionate about our work, and we would welcome the opportunity to work with you. For more information visit: www.perpetuityresearch.com

Director, Martin Gill, founded the Tackling Economic Crime Awards (TECAs); an award scheme that recognises and rewards individuals, teams, initiatives and companies involved in tackling different areas of economic crime operating in the public, private and not-for-profit sectors. For more information visit <https://thetecas.com/>

About Centre for Cybercrime and Economic Crime, UOP

The Centre for Cybercrime and Economic Crime (CCEC) was founded in 2023 by the University of Portsmouth encompassing over 40 academics with expertise in cybercrime, cyber security and economic crime. The Centre was built upon the Cybercrime Awareness Clinic and Centre for Counter Fraud Studies (CCFS). CCFS was founded in 2010 and has attracted over £1.25 million in funding conducting research and consultancy projects for a wide range of public and private sector clients. Some of the most significant public sector commissions have included projects into fraud and cybercrime victims for the UK Government Home Office, Association of Chief Police Officers and Sentencing Council; research on what works in fraud prevention for the Home Office; research on fraud measurement for the Foreign, Commonwealth and Development Office; working on the UK Government's annual Cyber Security Breaches Survey with IPSOS/Mori; and several projects on social media and economic crime for the UK Security Services and Intellectual Property Office. CCFS also worked with private companies too on a variety of projects related to fraud cost measurement (Cifas, Synectics Solutions, Crowe, PKF) and sanctions against fraudsters (Midlands Fraud Forum and Nuffield Trust). The CCFS also received funding from Government research councils such as the EPSRC and ESRC for projects related to open government and the risk of fraud, cybercrime and ageing, fraud, cybercrime in the UK and South Korea.

About the authors

Doctor Janice Goldstraw-White

Janice is a criminologist who has worked with Perpetuity since 2010 and has expertise in the areas of crime, governance, audit, risk management and security. With more than 20 years' prior experience as an accountant, mainly in the public sector, she is particularly interested in crime in the workplace, fraudster behaviour and the role of women in white-collar crime. She has extensively researched in the area of white-collar crime both here and in Australia, with a focus on offender accounts of criminal behaviour. She has particular experience in interviewing within prisons and has undertaken over fifty interviews with incarcerated white-collar offenders.

She has managed and delivered on a range of projects including research on tackling fraud in local authorities; whether the reporting of fraud in the UK should be compulsory; fraud in the Middle East; the problems of using digital evidence; and improving the police response to victims of fraud and scams. Her research interests however are by no means confined to white-collar crime and other research includes why death rates for security officers from COVID-19 are so high; security for data centres and the use of AI in security. She is currently involved in a study developing KPIs for the security sector.

Janice's research skills cover the spectrum of qualitative research, including desk-based literature and policy reviews; analysis and mapping of practice and procedures; interviews with professionals and service users; and facilitating focus groups. She also has a good understanding of quantitative data collection methods and analysis.

Janice has published a number of articles and co-authored separate chapters in books on workplace crime and the motives of white-collar criminals. Her own book entitled 'White-Collar Crime: Accounts of Offending Behaviour' was published in October 2011.

Professor Martin Gill

Professor Martin Gill is a criminologist and Director of Perpetuity Research which started life as a spin out company from the University of Leicester. He holds honorary/visiting Chairs at the Universities of Leicester and London. Martin has been actively involved in a range of studies relating to different aspects of business crime with a special emphasis on fraud and dishonesty offences. For example, much of his work has been involved with better understanding the fraudsters' perspective and he has interviewed a variety of different types of fraudsters, including dishonest staff, insurance fraudsters and identity fraudsters. He has published 15 books including the third edition of the 'Handbook of Security' which was published in 2022. He is the organiser and Chair of the Security Thought Leadership webinar series. Martin is a Fellow of The Security Institute, a member of the Company of Security Professionals (and a Freeman of the City of London). He is a Trustee of the ASIS Foundation. In 2002 the ASIS Security Foundation made a 'citation for distinguished service' in 'recognition of his significant contribution to the security profession'. In 2009 he was one of the country's top 5 most quoted criminologists. In 2010 he was recognised by the BSIA with a special award for 'outstanding service to the

security sector'. In 2015 and 2016 he was nominated and shortlisted for the Imbert Prize at the Association of Security Consultants and in the latter he won. In 2016 ASIS International awarded him a Presidential Order of Merit for distinguished service. In annual IFSEC listings he is regularly recorded as one of the world's most influential fire and security expert. In 2022 he was recognised by *Security Magazine* as one of the 'Most Influential People in Security' and also received the Mervyn David Award from the ASIS UK Chapter 'for his significant contribution to the security profession'. In 2016 he was entered onto the Register of Chartered Security Professionals. Martin is the Founder of the Outstanding Security Performance Awards (the OSPAs and Cyber OSPAs) and Tackling Economic Crime Awards (the TECAs).

Professor Mark Button

Mark Button is Co-Founder and Co-Director of the Centre for Cybercrime and Economic Crime at the University of Portsmouth. He was founder and Director of the Centre for Counter Fraud Studies at the School of Criminology and Criminal Justice, University of Portsmouth between 2010-2022. Mark has written extensively on counter-fraud, cyber-fraud and private policing issues, publishing many articles, chapters and completing eleven books, including *Economic Crime: From Conception to Response*; *Private Policing and Cyber Frauds, Scams and their Victims*. Some of the most significant research projects include a Home Office funded study on victims of computer misuse, leading the research on behalf of the National Fraud Authority and ACPO on fraud victims; the Department for International Development on fraud measurement, and an ESRC funded project on ageing and fraud in the UK and South Korea. Mark also worked for four years on the Government's Annual Cyber Security Breaches Survey. Mark completed his undergraduate studies at the University of Exeter, his master's at the University of Warwick and his Doctorate at the London School of Economics.

About the project advisors

Ian Dyson, QPM

Ian Dyson retired after a 38-year career in policing, the last 6 as the Commissioner of the City of London police. In that role he was the National Police lead for Fraud, Economic Crime, Cyber Crime, Financial Investigation, and Business Crime. He was also the National Police lead on Technology and Information Management, and for 6 years was the National Police Senior 5 Information Risk Owner (SIRO). He is now trustee of a number of charities and sits as a NED or Advisor to a number of companies in the crime, tech or cyber security sectors. He is a distinguished fellow of RUSI (Royal United Services Institute) and a Deputy Lieutenant (DL) for Greater London.

Mick Creedon

Mick Creedon retired after 37 years in policing, the last 10 of which were as the Chief Constable in Derbyshire. Working in the Leicestershire Constabulary, Mick served as a detective at every level in the service with extensive experience of investigating homicide, corruption and all manner of serious and organised crime work. He transferred to Derbyshire in 2003 as Assistant Chief Constable and in 2006 became the first UK Police service National Coordinator for Serious and Organised Crime. He has carried out many sensitive and high-profile external reviews and inquiries, working with numerous forces, the Metropolitan Police Service, the CPS, the IPCC/IOPC, HMRC, MI5, the Criminal Cases Review Commission, the Home Office and many others. Mick was the national policing lead for many areas of policing including serious and organised crime, covert policing, kidnap and extortion, investigative interviewing, financial investigation, money laundering and asset recovery. In 2002 Mick was the lead officer for the development of the East Midlands Special Operations Unit (EMSOU) and he later led the development of the network of multi-force and multi-agency Regional Organised Crime Units.

In retirement, Mick has held positions with a number of universities including Leicester, Derby and Liverpool John Moore as well as being a senior associate with the Royal United Services Institute (RUSI). He has worked with a number of government departments including the Home Office, the Foreign Office, the Cabinet Office and the Ministry of Defence. He has also worked with a number of UK based Police ICT providers and has worked in Canada, Columbia and the Middle East. He has worked on several Home Office and policing commissions under the 'Accelerated Capabilities Environment' (ACE), including questions around the Police National Database, lawful intercept and communications data and the best and most effective use of multiple intelligence systems. He was part of a team that reviewed the national 'Proceeds of Crime Centre' within the National Crime Agency and provided direct support during the COVID pandemic in establishing the National Joint Biosecurity Centre. He has recently concluded a role as the Home Secretary's independent reviewer of the Police Management of Sex Offenders.



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