



**Mark Burns-Williamson OBE**  
Police and Crime Commissioner for West Yorkshire  
Ploughland House  
62 George Street  
Wakefield WF1 1DL



Office of the  
**Police & Crime  
Commissioner**  
West Yorkshire

My Reference: OPCC/MBW/NF

Your Reference:

17 May 2019

Dear Home Secretary,

### **HMICFRS Response: Fraud – Time to Choose**

I am writing in response to the recent national HMICFRS inspection report on our police services' response to fraud. West Yorkshire Police contributed to this work as one of the inspected forces, and I am grateful for the observations and recommendations outlined in the report.

The prevalence of fraud continues to be a cause for concern – a high volume, resource intensive crime which can sometimes fail to eclipse the demands of other crimes with pose a greater degree of threat or potential for harm. Your report highlights this dichotomy, and in its title, poses the key question which law enforcement agencies have to answer.

Here in West Yorkshire, just 11% of respondents to my community surveys feel that cyber-enabled crime is an issue in their neighbourhoods, yet your report highlights that Crime Survey of England and Wales data records that almost one third of all crime is associated with fraud. Action Fraud data has estimated that £15.2M was lost to fraudsters by businesses and individuals in this county between April and September 2018 alone<sup>1</sup>.

West Yorkshire Police has built its capacity to tackle fraud through the extension of its Economic Crime Unit [ECU], and I have supported its work by co-funding the West Yorkshire Financial Exploitation and Abuse Team [WYFEAT]. WYFEAT calls on the expertise of specialists from West Yorkshire Police's Economic Crime Unit, local adult social care, and Trading Standards, to collaborate in the investigation of criminals who financially exploit vulnerable or older people through scams and doorstep crime.

As well as the collaboration with WYFEAT, the ECU works in partnership through a Tactical Fraud Prevention Group, attended by a wide range of partners, and is developing a Fraud Ambassador network of Special Constables and volunteers. ECU also supports targeted media campaigns addressing local and national emerging fraud threats.

Tel No: 01924 294000

Email: [markburns-williamson@westyorkshire.pcc.pnn.gov.uk](mailto:markburns-williamson@westyorkshire.pcc.pnn.gov.uk)

[www.westyorkshire-pcc.gov.uk](http://www.westyorkshire-pcc.gov.uk)

 /Office of the Police and Crime Commissioner  @WestYorksOPCC

**Looking at the relevant recommendations listed in this report**, I would like to highlight the work being undertaken by West Yorkshire Police to build our capacity to disrupt fraudsters and organised gangs, and support those who become their victims:

- **By 30 September 2019, chief constables should publish their force’s policy for responding to and investigating allegations of fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).**
  - West Yorkshire Police’s existing policy addressing the recording, allocation and investigation of fraud will be reviewed in May prior to its publication. Currently the force feels the challenge is to develop a consistent application of the policy for all ‘Call for Service’ reports. This is applied to all disseminations of crime received from Action Fraud.
  
- *Suggested areas for improvement:*
  - **Improve the way forces uses the National Fraud Intelligence Bureau monthly victim lists to identify and support vulnerable victims and others who require additional support;**
    - West Yorkshire Police follow the principles of the national Operation SIGNATURE approach of support for vulnerable victims, including a dedicated Victim Care and Crime Prevention Officer based in the ECU.
    - Data received from Action Fraud for all victims is subject to assessment and review for further crime prevention, education and signposting.
    - We are working with City of London Police Economic Crime Victim Care Unit to extend our reach to a wider number of victims.
  
  - **Ensure forces improve the identification and mapping of organised crime groups in which the principal criminality is fraud;**
    - The ROCTA (Regional Organised Crime Threat Assessment) team based in the Yorkshire & Humber regional organised crime unit are supporting all forces to better understand and map OCGs criminality, including those OCGs practising fraud. West Yorkshire has one of the highest concentrations of ECML (Economic Crime and Money Laundering) OCGs nationally.
  
  - **Ensure that fraudsters are included among those considered for serious organised crime ‘prevent’ tactics, including by local strategic partnership boards and through integrated offender management processes;**
    - All serious criminality including fraud is considered for PREVENT tactics, and all mapped Fraud OCGs are discussed at the local district level BRONZE meetings of West Yorkshire Police’s operation against organised crime, Programme Precision.
  
  - **Increase force’s use of ancillary orders against fraudsters;**
    - Ancillary orders are considered where they are appropriate and there has been a reiteration of these tactics via the Programme Precision SILVER board. All opportunities for asset denial and victim compensation via Proceeds of Crime and other legislation are considered on all cases.

---

<sup>1</sup> <https://www.yorkshirepost.co.uk/lifestyle/fraudsters-target-yorkshire-s-most-vulnerable-to-steal-a-staggering-30m-in-just-six-months-1-9725827>

▪ **Ensure that forces comply with the Code of Practice for Victims of Crime when investigating fraud.**

- ECU are currently reviewing the victim response across the force to ensure it is consistent with that provided by the ECU for Action Fraud disseminations.

Last year West Yorkshire Police recognised the need to improve the response to businesses affected by fraud, and took action to establish a 'Business Crime Prevention Group'. Through this group, the police have built an understanding of how fraud impacts on the local economy and how the force can improve its service to industry. Unfortunately, group members have reported back their lack of confidence in Action Fraud, implying that delays encountered are now leading to an under-reporting of fraud in business sectors. Engagement such as this is an example of the good work we have achieved in building our police service's capacity to fight fraud in conjunction with our regional crime unit and local partners. In the past year, West Yorkshire Police's Financial Investigation Unit working with the North East Asset Recovery Team has seen criminals ordered to repay over £21M of the proceeds of crimes, including fraud. Nearly £6M of these monies were returned directly to fraud victims.

However, the tension in the interaction of the national and local response to fraud is rightly highlighted in your report. The referral of cases up and down the line to the City of London Police, the understanding of responsibilities between law enforcement agencies, and the correct use of the intelligence gathered needs the better coordination you have requested.

An example can be cited from the National Economic Crime Centre. Feedback from officers in West Yorkshire's ECU suggests that, whilst they welcome new investment in the fight against economic crime, they are still to understand how the NECC will enhance their work at the local level.

Major cases of fraud are rarely anything other than complex and resource intensive, and more must be done to support forces struggling with large volumes of intelligence collated and disseminated by Action Fraud. Ultimately victims suffer; there is no shortage of correspondents to my Casework Team who have found themselves waiting for months to hear how Action Fraud propose to proceed with their case.

West Yorkshire Police, as will be the case in many forces, need to prioritise their work where threat, harm and risk is greatest, and as a consequence, there can be a limited availability of resources to tackle fraud. Improved working practices between local and national agencies can take us some of the way to building a better response, but the bigger issue of how forces can meet the growing demand for their services from *all* types of crime will surely temper our efforts to fully meet the challenge of fraud in the way we might hope to.

Yours sincerely



Mark Burns-Williamson  
Police and Crime Commissioner for West Yorkshire

Tel No: 01924 294000

Email: [markburns-williamson@westyorkshire.pcc.pnn.gov.uk](mailto:markburns-williamson@westyorkshire.pcc.pnn.gov.uk)

[www.westyorkshire-pcc.gov.uk](http://www.westyorkshire-pcc.gov.uk)