
**RESPONSE TO THE DRAFT POLICE AND CRIME PLAN FOR LONDON 2017-2021
CONSULTATION PUBLISHED 01 DECEMBER 2016**

The Fraud Advisory Panel welcomes the opportunity to comment on *A Safer City for All Londoners: Draft Police and Crime Plan for London 2017-2021* consultation paper published by the Mayor's Office for Policing and Crime (MOPAC) on 01 December 2016, a copy of which is available from this [link](#).

This response of 01 March 2017 reflects the views of the Fraud Advisory Panel's board of trustee directors who represent our members. Our members are anti-fraud professionals from all sectors and disciplines.

We are happy to discuss any aspect of our comments and to take part in all further consultations on the issues we've highlighted in our response.

The Fraud Advisory Panel (the 'Panel') is the UK's leading anti-fraud charity.

Established in 1998 we bring together fraud professionals to improve fraud resilience across society and around the world.

We provide practical support to almost 300 corporate and individual members drawn from the public, private and voluntary sectors and many different professions. All are united by a common concern about fraud and a shared determination to do something about it.

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MAJOR POINTS

1. We propose only to address two specific questions asked in the consultation document, namely:
 - Question 2: Do you think the priorities stated by the Mayor are the right ones? Thinking about the priorities – please provide any comments you have about the plan itself including anything you would add or change.
 - Question 6: What would you like to see more emphasis on.

A. THE PRIORITIES

2. According to the latest crime survey for England and Wales fraud is now the most frequent crime experienced by adults in this country with an estimated 3.6m incidents reported for the year to September 2016. Over half of these are cyber-related.¹
3. Previous research by MOPAC which looked more specifically at online victimisation has also found that more Londoners have been the victim of online theft and fraud than traditional forms of property crime.² The prevalence of fraud in London is highlighted in the consultation document which states that ‘Police data shows that nearly one in five fraud crimes referred from Action Fraud was attributed to the MPS’³.
4. Anyone can become the victim of a fraud.⁴ Fraud systematically erodes our trust and confidence in people, businesses and institutions, and can result in significant financial, physical, emotional and psychological harm to those who fall victim. The current economic conditions make individuals and small businesses especially vulnerable to fraud and it is very worrying to see so much money falling into the hands of fraudsters.
5. We would, therefore, like to see more emphasis given to fraud within the draft police and crime plan for London. We hope that the draft plan is not evidence of a diminishing interest and priority being given to policing fraud in the capital. Over the past few years the investment in the Fraud and Linked Crime Online command (FALCON) has shown MOPACs commitment to tackling fraud and online crime and this momentum should not, indeed cannot, be lost if we are to win this fight.
6. We encourage MOPAC to consider prioritising counter-fraud initiatives and providing funding on a multi-year basis, not only for fraud prevention and investigation, but also for initiatives such as the Economic Crime Victim Care Unit (ECVCU) to ensure a greater continuity in service provision and enable more victims to be helped each year.

¹ Office for National Statistics (2017). *Statistical Bulletin: Crime in England and Wales: Year ending September 2016*. Available from <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingsept2016#whats-happening-to-trends-in-fraud>

² Greater London Authority (2015). *Tightening the net: the Metropolitan Police Service’s response to online theft and fraud*. Available from https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Tightening%20the%20net_0.pdf

³ See page 8.

⁴ Greater London Authority (2015). *Tightening the net: the Metropolitan Police Service’s response to online theft and fraud*. Available from https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Tightening%20the%20net_0.pdf. Also see Office for National Statistics (2017). *Statistical Bulletin: Crime in England and Wales: Year ending September 2016*. Available from <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingsept2016>

B. A BETTER CRIMINAL JUSTICE SERVICE FOR LONDON

7. We fully support MOPAC's commitment to improve the treatment of crime victims and to protect London's most vulnerable people. We encourage the inclusion of fraud victims within these plans; well-funded, well-publicised and accessible support services are desperately needed, and these services should be made available to smaller businesses too.⁵
8. In our experience many fraud victims want their money back therefore we encourage MOPAC to explore ways to ensure that all fraud victims fully understand what will happen if they go down the criminal justice route, including the chances of receiving any compensation.⁶
9. Of course, not every fraud reported to Action Fraud (the national fraud and cybercrime reporting centre) will result in a criminal justice outcome. The attrition rate for fraud cases is believed to be particularly high⁷ and this unfortunately leaves many victims disadvantaged and unable to access mainstream victim care. A significant number of victims find their cases 'screened out' of the process for a variety of reasons and at any number of stages.⁸ This can happen very quickly for victims whose cases are deemed unsolvable or incapable of further investigation by the National Fraud Intelligence Bureau (NFIB).
10. In 2014 Action Fraud established an Economic Crime Victim Care Unit (ECVCU) to address this gap and help vulnerable victims in London, and to reduce repeat victimisation.⁹ After receiving initial one-year funding from MOPAC (via a bid to the Ministry of Justice) it has subsequently been funded for a further two years. Over this time the ECVCU has become a reference point for the joint provision of vulnerable victim services in London, working in close partnership with the City of London Police and Metropolitan Police Service.
11. The ECVCU has supported over 3,000 people with no repeat victimisation reported so far. In addition:
 - victims with recognised safeguarding needs are referred onto other support services with the assistance of the Metropolitan Police Service's (MPS) FALCON and community-based teams; and
 - work has begun on the provision of targeted prevention advice to better safeguard particular groups of actual and potential victims, including older people and those with debt problems.

⁵ Fraud Advisory Panel (2013). *Obtaining redress and improving outcomes for the victims of fraud: Main themes and recommendations*. Available from <https://www.fraudadvisorypanel.org/wp-content/uploads/2015/04/7435-WEB-FAP-Main-Themes-and-Recommendations-May13.pdf>

⁶ Ibid.

⁷ Fraud Advisory Panel (2012). *Obtaining redress and improving outcomes for the victims of fraud: An introduction to the civil justice initiative*. Available from <https://www.fraudadvisorypanel.org/wp-content/uploads/2015/04/6040-3B-WEB-FAP-An-Introduction-to-Criminal-Justice-Initiative.pdf>. Also see Button, Mark, Shepherd, David, Blackbourne, Dean (November 2016). *The fraud 'justice systems': A scoping study on the civil, regulatory and private paths to 'justice' for fraudsters (summary report)*. Available from: <http://www.port.ac.uk/media/contacts-and-departments/icjs/ccfs/Fraud-Justice-Systems-2016---Summary-Report.pdf> University of Portsmouth, Centre for Counter Fraud Studies.

⁸ Ibid.

⁹ Fraud Advisory Panel (2015). *Supporting the victims of fraud*. Available from <https://www.fraudadvisorypanel.org/about-us/what-we-do/#Annualreports>

12. The experience of the ECVCU has shown that victims (who may be very indifferent to the level of service that they have received from the criminal justice system) can be made to feel safer and more confident.
13. It is very positive that MOPAC have now funded the ECVCU for over three years. However we understand that the annual cycle of funding (with confirmation coming very close to the beginning of each financial year) has made the recruitment and retention of staff challenging. We have seen this first hand as an independent member of the project board and encourage MOPAC to consider funding the ECVCU on a multi-year basis to ensure a greater continuity in service provision and enable more victims to be helped each year.