

Response to Questions Submitted

OPCC Response

Your question came in two parts which I will address as such:

1. 'Can the Commissioner confirm that Dyfed-Powys has fully complied with all the recommendations in both reports that are applicable to it. How has the Commissioner satisfied himself that this indeed the case.'

Following the publication of the HMICFRS report (Spotlight Report: A review of Fraud: Time to Choose. A Revisit of the 2018 Fraud Inspection) I requested direct feedback from the Force and the Economic Crime Team Manager in terms of the specific recommendations made and I am confident that as a Force we are not only meeting but exceeding the requirements.

The report referred to recommendations which HMICFRS still viewed as being outstanding following the original report published in 2019. The Dyfed Powys Police position in relation to the recommendations relevant to the police is as follows:

'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).'

Dyfed-Powys force have completed this and the policy has been published.

'By 30 September 2021, chief constables should make sure that their forces are following the guidance issued by the National Police Chiefs' Council Coordinator for Economic Crime about fraud-related calls for service.'

'By 31 October 2021, chief constables should adopt the guidance issued in September 2019 by the National Police Chiefs' Council Coordinator for Economic Crime that was aimed at improving the information given to victims when reporting fraud.'

Dyfed-Powys undertook a review of their processes to ensure they are in compliance with the NPCC's guidance. Current practices exceed these recommendations. However they are having to make minor process changes to ensure continued compliance and are liaising with IS&T to facilitate these changes.

The report also raised 5 areas for improvement:

Area for Improvement 1

'To make improvements in this area, chief constables should improve the way their force uses the National Fraud Intelligence Bureau (NFIB) monthly victim lists to identify and support vulnerable victims and others who require additional support.'

The NFIB sends to each force the details of all victims who reside in their area and have reported a crime to Action Fraud. HMICFRS' previous inspection found that forces did not use these lists effectively to protect people who may be at increased risk.

Whilst Dyfed-Powys Police makes use of the weekly NFIB victim list, an alternative process has been adopted to ensure that the majority of fraud victims receive support at the earliest point of reporting.

During the early part of 2020, the Economic Crime Team (ECT) identified that the National Fraud Intelligence Bureau (NFIB) data does not accurately reflect the true scale of fraud. From 6th April 2020 the ECT have undertaken the management of all fraud and cybercrime incidents reported to the Force as a call for service - triaging the reports and engaging with victims at the earliest opportunity in order to provide consistent subject matter expert advice, guidance and support and to ensure accurate reporting to Action Fraud (AF). In November 2020 the Force employed a full-time Fraud Triage Officer, working within the ECT to manage fraud calls for service. This role was funded by the PCC.

The initiative saw a 108% increase in the number of frauds being reported to Action Fraud, both directly and via Dyfed-Powys Police as a Call for service in 20/2021.

During the year, 407 vulnerable victims were referred in to Operation Signature to receive enhanced support through the Fraud Safeguarding Officer. This role was funded by the PCC.

The weekly NFIB list includes reports following call for service to Dyfed-Powys Police as well as those victims that have reported directly to AF. Those victims on the Action Fraud victim list that have reported to Dyfed-Powys Police as a call for service have already received advice, guidance and support at the earliest stage, prior to the report being made to AF.

The weekly NFIB victim list is scrutinised by the Fraud Safeguarding and Triage Officers and those individuals that have reported directly to AF and appear to be vulnerable are also referred into Op Signature.

Dyfed-Powys are engaging with a significant number of fraud victims, either following call for service or having been identified as potentially vulnerable on the weekly NFIB victim list by the Safeguarding/Triage Officers. This leaves a small number of non-vulnerable victims who reported directly to AF that Dyfed-Powys Police do not have the resources to make contact with. As a consequence they are consulting with the National Economic Crime Victim Care Unit in order for them to fill that void in their next funding roll out, which will be within the next 2 months.

Area for Improvement 2

'Chief Constables should ensure their forces improve the identification and mapping of organised crime groups in which the principal criminality is fraud'

Organised Crime Group Mapping is identified through NFIB disseminations and Suspicious Activity Reports, this is an ongoing process which is continually reviewed. The ECT apply a matrix assessment to cases which are escalated using the ROCTA (Regional Organised Crime Threat Assessment) fraud escalation process where applicable.

ECT representatives attend and play an active role in the FIDG (Force Intelligence Development Group) and Divisional County Intelligence meetings. Op Racecourse is the Dyfed-Powys response to courier fraud. All courier fraud victims receive an enhanced victim service and an investigation and intelligence scope is conducted. A nominated Fraud Investigator is the Dyfed-Powys SPOC for Racecourse and intelligence is fed into the national picture. Op Racecourse has been successful in identifying Organised Crime Groups involved in courier fraud.

Area for Improvement 3

'To make improvements in this area, chief constables should 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.'

The opportunity for obtaining a SCPO (Serious Crime Prevention Order) following a conviction for fraud is always considered, to date however the situation has not arisen and there are currently no SCPOs for fraud held by Dyfed-Powys. The ECT are however assisting the Offender Management Unit with 3 individuals residing in the force area, who have orders in their name following conviction for fraud elsewhere in the UK.

The ECT are developing engagement with the INTACT SVOC Programme, through the INTACT Coordinator.

Area for Improvement 4

'To make improvements in this area, chief constables should increase their force's use of ancillary orders against fraudsters.'

All fraud cases undergo consideration for POCA (Proceeds of Crime Act) confiscation orders as a matter of course and Dyfed-Powys has processes in place to ensure that the opportunities to use ancillary orders are not missed. Tarian Regional Organised Crime Unit currently provide support in securing an Account Freezing Order and the civil recovery of money. A Dyfed-Powys ECT Financial Investigator (FI) is undergoing accreditation as a Civil Recovery Investigator so that Dyfed-Powys will have capacity to undertake its own civil recovery investigations/ancillary orders.

Area for Improvement 5

'To make improvements in this area, chief constables should ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.'

Frauds reported as a call for service are recorded in accordance with the National Crime Recording Standards (NCRS). The criteria for recording a fraud in Dyfed-Powys as a crime, as opposed to simply reporting to AF is as follows:

- crime in action;
- known local offender;
- vulnerable victim [including 18 and under]; or
- PNC registered vehicle (detailed below)

On those occasions initial victim contact is made through the process set out above, following which the incident is referred to Division for investigation. Once recorded as a crime it is the Officer In Charge's line manager's responsibility to ensure compliance with the Victim Codes of Practice (VCOP).

As of 9th August 2021 the ECT employed a Fraud Supervisor, who will be responsible for improving the quality of fraud investigations across Dyfed-Powys. This will be achieved by providing investigative advice and guidance from the outset, setting proportionate action plans and ensuring VCOP compliance.

It is the NFIB's responsibility to comply with VCOP when frauds are reported to them. NFIB do however disseminate some reports that require victim support to Forces for an enhanced victim service. These referrals are received by the ECT and fed in to Operation Signature.

The NFIB also disseminate some reports to Forces for pursue investigations. These disseminations are recorded as a crime in Dyfed-Powys and victims receive support through VCOP, as described above.

2. 'How will the Commissioner continue to monitor progress by the force in this regard to ensure that it does not fail the victims of fraud in the future.'

I am confident that Dyfed-Powys as a Force recognises the major challenges that fraud presents. It is extremely encouraging that the work being done by Dyfed-Powys Force with vulnerable victims, providing advice, guidance and support has been recognised at a national level and is well regarded by HMIC. It should also be noted that Dyfed-Powys Police was mentioned both at a national conference in London and at a safeguarding conference in York held in late September.

I continually monitor the progress by the Force in this regard and the recent introduction (by The City of London Police as National Lead Force for Fraud and NPCC lead for Economic and Cyber Crime) of a monthly National Lead Force Newsletter to PCCs will further enable my office to hold Dyfed-Powys to account, as we do with other crime types, receiving performance of our Force against the fraud cases disseminated to them by Action Fraud.

The number of victims in the Dyfed-Powys area has increased significantly in the past 12 months and whilst this might be seen as a negative that we have a high per 1,000 population referral rate, I actually think this is really positive. (figs below)

DPP are the only Force in the country that actively encourages members of the public to report fraud directly to us and we then report to Action Fraud on their behalf.

The funding I provided for a Triage Officer has enabled this to happen. The Force identified in Dec 19/Jan 20 that the reports to Action Fraud across the country were wrong and did not accurately reflect the scale of fraud. From April 2020 all reports from members of the public are recorded on STORM and contact is made with EVERY one that reports. This accounts for the significant rise in numbers. This also means that the quality of the report being sent to Action Fraud is improved.

- No. of victims in Dyfed-Powys area reporting to action fraud in 2020-21 was 8.8 (per 1,000 population) ranked 3 highest (ranking 1 = highest per 1,000)
- This compares to an All Forces figure of 6.4 and Wales and MSG figures both showing as 6.2
- This is a substantial increase from the 2019-20 reported figure of 3.9 when Dyfed-Powys were ranked 41 highest.

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