



Heddlu Police

DYFED-POWYS

Fraud Policy

Policy summary:	<i>Responding to and investigating allegations of fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).</i>
Policy number:	<i>005/2020</i>
Version control:	<i>Version: 2.0 Date: 14/09/2022 Author: [REDACTED] Rationale: Review of content – no change. Updated template. A full version control is available here.</i>
Date implemented:	<i>05/02/2020</i>
Review date:	<i>13/09/2024</i>
Owner/contact:	<i>Economic Crime Team</i>
Approval	<i>DCI [REDACTED] 14/09/2022</i>
Final Approval	<i>DCI [REDACTED] 14/09/2022</i>
Consultation and approval	<i>CID SMT Detective Chief Superintendent, Head of CID</i>
Welsh Translation	<i>Yes</i>



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1. Statement of Policy

Recommendation 9 of the Her Majesty's Inspectorate of Constabulary (HMIC) inspection report entitled 'Fraud: Time to Choose', which was published in April 2019, stated "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)".

This policy, when read in conjunction with the Force Fraud Strategy [version 1 dated 20.9.2019] addresses the HMIC recommendation.

Applies (but not limited) to: All categories of Dyfed-Powys Police employees, whether full-time, part-time, permanent, fixed term, temporary (including agency staff, associates and contractors) or seconded staff. Any employee accessing and using Force assets and property must have due regard to the contents of this policy.

2. Policy Scope

This policy ensures that Dyfed-Powys Police (DPP) are compliant in managing and investigating fraud 'calls for service' and National Fraud Intelligence Bureau (NFIB) disseminations for enforcement, in accordance with the National Police Chief Council's (NPCC) 'National Fraud Policing Strategy 2019-2022' and Home Office (HO) national crime recording standards.

'Calls for service' are victim reported allegations of fraud made to the Force Communications Centre (FCC), or by attendance at a Police Station. The guidance and processes for managing calls for service are set out in the Force Fraud Strategy.

The NFIB disseminates fraud reports to DPP for enforcement where it has been assessed by them that the most appropriate force to undertake an investigation would be DPP. The guidance and processes for managing such disseminations are set out in the Force Fraud Strategy.

The risk to DPP in not following this policy could cause a failure to comply with the 'National Fraud Policing Strategy 2019-2022', HO national crime recording standards or the victim's codes of practice.



This policy affects the Economic Crime Team (ECT), the Criminal Investigation Department, the FCC, the Incident Crime Allocation Team (ICAT), Police Response and Neighbourhood Police Teams and the Crime Recording Bureau. All staff within those areas of business should be aware of the policy.

3. Powers and Policy/Legal Requirements

This policy is fit for purpose in that it meets governance requirements both internally and externally and is compliant with the NPCC 'National Fraud Policing Strategy 2019-2022' and Recommendation 9 of the HMIC inspection report entitled 'Fraud: Time to Choose'.

Legislation in relation to the HO national crime recording standards and Victim Codes of Practice is relevant to certain aspects of this policy.

4. Options and Contingencies

Policy Owner: The policy will be owned by the ECT who will be responsible for regularly monitoring the policy for:

- Its effectiveness;
- Any changes to HO rules and NPCC or NFIB guidance;
- Challenges to the Policy; and
- Any identified inefficiencies in relation to implementation

Approval Process: Approval decisions regarding the implementation of the policy will be made by the Head of CID and the Force Operations Board.

The Force Fraud Strategy: the strategy identifies the procedures and processes for responding to Calls for Service and NFIB disseminations for enforcement.

It also provides guidance in respect of:

- the Fraud Assessment Principles
- making a referral to the Regional Intelligence Group (RIG)
- Partner Agency investigations
- the 'transcrime' process
- allocating fraud investigations to Division



- allocating fraud investigations to the ECT and cyber investigators
- applying the Fraud Investigation Model
- managing victims of fraud
- understanding emerging threats

The processes identified within the Force Fraud Strategy are applicable to all police officers and police staff who are involved in any aspects of the recording, allocation and investigation of fraud within DPP. Referral to supervisors and managers for advice and guidance will be sought where deemed appropriate. The process will however be robustly and effectively monitored by supervisors and managers to ensure continued compliance [see 5. Take action and review].

The following Code of Ethics principles are relevant to this policy:

Accountability - We will be answerable for the decisions, actions and omissions made in relation to the application of the processes and procedures contained within the Fraud Strategy.

Honesty - We will apply the processes and procedures contained within the Fraud Strategy with honesty to maintain the trust of the community we serve.

Integrity - We will always strive to do the right thing.

Objectivity - The application of the processes and procedures contained within the Fraud Strategy and the decisions made will be based upon evidence and best professional judgement.

Openness - We will be open and transparent in our actions and decisions.

Respect - We will treat everyone with respect.

Selflessness - We will act selflessly and in the public interest.

5. Take action and review

All Calls for Service are recorded on STORM, the Force command and control system, and the assessment process set out in the Force Fraud Strategy is applied.



Calls for Service, when recorded as a crime by DPP, undergo continuous positive supervision.

Fraud Calls for Service, are 'tagged' on STORM by the FCC, Incident Crime Allocation Team or Divisional staff for the attention of the ECT, who have a responsibility to monitor fraud tags and to advise and assist the investigating officers.

In addition, an automated notification is sent to the ECT email inbox when a fraud crime is recorded. Fraud investigators are responsible for reviewing these crimes in order to assess the nature of the complaint and to provide investigative advice and guidance to officers.

All disseminations for enforcement are sent by the NFIB to the DPP ECT, using the Vault system. These referrals are then assessed using a Fraud Matrix prior to being allocated for investigation. All of the disseminations received are recorded and monitored on an Excel spreadsheet (maintained by the ECT), STORM and the Crime Management System.

It is the responsibility of the Officer allocated the case for investigation to notify the NFIB of the Force crime reference.

The FCR provides the NFIB with a monthly list of those fraud crimes that have received an outcome during the preceding month.

The process detailing the management of NFIB disseminations received by DPP is set out in the Force Fraud Strategy and these procedures are regularly tested to ensure the strategy is fit for purpose and embedded within the force.

To ensure understanding of the processes contained with the Fraud Strategy Police Officers and Police Staff working within the departments affected by this policy are provided with training and regular 'reminders' are given.

Any significant failures within the procedures contained with the Force Fraud Strategy are referred for consideration to the Force 'Lessons Learned Committee'.

Complaints made by members of the public to the Professional Standards Department in relation to the management of fraud calls for service and disseminations for enforcement are assessed against the Force Fraud Policy and Strategy.



EQUALITY IMPACT ASSESSMENT

Section 4 of the Equality Act 2010 sets out the **protected characteristics** that qualify for protection under the Act as follows: Age; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion or Belief; Sex; Sexual Orientation.

The **public sector equality duty** places a proactive legal requirement on public bodies to have regard, in the exercise of their functions, to the need to:

- eliminate discrimination, harassment, victimisation, and any other conduct that is unlawful under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The equality duty applies to all protected characteristics with the exception of Marriage and Civil Partnership, to which only the duty to have regard to the need to eliminate discrimination applies.

Carrying out an **equality impact assessment** involves systematically assessing the likely or actual effects of policies on people in respect of all the protected characteristics set out above. An equality impact assessment should be carried out on any policy that is **relevant** to the public sector equality duty. An equality impact assessment template is available [here](#).



EQUALITY IMPACT ASSESSMENT COMPLETED

Name:	[REDACTED]
Department:	ECT
Signed:	[REDACTED]
Date:	13/09/2022

HUMAN RIGHTS ACT CERTIFICATE OF COMPLIANCE

This policy has been drafted in accordance with the Human Rights Act and has been reviewed on the basis of its content and the supporting evidence and it is deemed compliant with that Act and the principles underpinning it.

Name:	[REDACTED]
Department:	Legal Services
Signed:	[REDACTED]
Date:	14 September 2022

CODE OF ETHICS CERTIFICATE OF COMPLIANCE

This policy has been drafted in accordance with the Code of Ethics and has been reviewed on the basis of its content and the supporting evidence and it is deemed compliant with that Code and the principles underpinning it.

Name:	[REDACTED]
Department:	ECT
Signed:	[REDACTED]
Date:	14/09/2022




Freedom of Information Act 2000

Section 19 of the Freedom of Information Act 2000 places a requirement upon the Force to publish all policies on the Force website. Policies are why we do things and procedures are how we do them. A case-by-case review of procedures must be undertaken to protect law enforcement and health and safety considerations. Where a combined policy and procedure document is being produced the Force is legally required to publish the policy section and assess the procedure part to ensure no sensitive information is published. Generally the default position shall be that a policy and accompanying procedure document will be produced separately.

There is a requirement therefore to review this document to establish its suitability for publication. Please identify below whether the document is suitable for publication in its entirety or not. Where it is believed that disclosure will be harmful please articulate the harm that publication would cause and highlight the relevant sections within the document. Where it is perceived that there is harm in disclosure the document should be forwarded to the Disclosure Unit for review.

Suitability for publication

Suitability for publication	Yes/No	Date	Signature
Document is suitable for publication in its entirety	Yes	14/09/2022	
Document is suitable for publication in part, I have identified those sections which I believe are not suitable for disclosure and have articulated below the harm which would be caused by publication.			

Outline of any harm identified in publication:



FOI review – to be completed by Disclosure Unit

(Only required if author believes there is any harm in disclosure)

Suitability for publication	Yes/No	Date	FOI Decision Maker
Document is suitable for publication in its entirety			
Document is suitable for disclosure in part and relevant redactions have been applied. A public facing version has been created.			

Once review has been undertaken, FOI Disclosure Officer to return document to policy author and following sign-off, document to be published within Force Publication Scheme. Any future changes to the document should be brought to the attention of the Policy Officer and the Disclosure Unit, as appropriate.

Full Version Control

Version	Date	Author	Rationale
1.0	30/09/2019	[REDACTED]	New Force Fraud Policy
2.0	14/09/2022	[REDACTED]	Review of content – no change. Updated template.