

# WILTSHIRE POLICE FORCE POLICY



## FRAUD

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## **POLICY STATEMENT**

Fraud is a hidden and under-reported crime with victims often in denial or unaware of the criminality behind it. Increasingly fraud is becoming more complex and sophisticated, much of which is targeted at vulnerable and elderly people. Technology is enabling fraudsters to carry out attacks more quickly and employ more complex behaviours to remain undetected.

The nature of fraud victimisation is not only financial. The emotional impact is significant and includes guilt, misplaced trust and diminished confidence, resulting in detrimental effects on physical and mental health and increased social isolation.

Fraud is a type of criminal activity as defined by the [Fraud Act 2006](#).

Fraud is also classified as a 'lifestyle' offence and one where the Proceeds of Crime Act can be applied (see [Recovery of Criminal Assets Policy](#) and the [Seizure and Retention of Money Procedure](#)).

All cases of fraud whether reported direct by the victim or referred by the police are now recorded centrally via Action Fraud and analysed by experts within the National Fraud Intelligence Bureau (NFIB) hosted by the City of London Police. Following analysis, the NFIB provides the police and other law enforcement agencies with individual crime packages that identify viable opportunities for either investigation or disruption.

The expectation is that all referrals from NFIB will be considered for investigation, however, as with 'calls for service' the decision on whether to investigate an allegation of fraud lies solely with the police.

Police forces will not record fraud as crimes. Frauds are now given Non-Crime numbers by Police Forces. All fraud and cybercrime will be managed within the NFIB from where it will be accessed by those Government Departments with an interest in such data.

### **Fraud is [reported](#) to Wiltshire Police in a number of ways:**

- 1) Disseminations to the Force by the Nation Fraud Intelligence Bureau. These disseminations are sent to a 'Vault' which is accessed by the Crime and Communication Centre (CCC) Supervisors. A niche is created and then allocated to the most appropriate department after applying the '[Fraud Allocation Matrix](#)' which is contained in the '[Crime Allocation Policy](#)' on Firstpoint.
- 2) If a member of the public reports direct to the CCC and it is a 'call for service' (see below). It is then allocated according to the 'Fraud Allocation Matrix' which is contained in the '[Crime Allocation Policy](#)' on Firstpoint.
- 3) Partners Agency referrals who include Wiltshire Council, Department for Work and Pensions and Trading Standards. The Fraud Allocation Matrix is used to identify which department investigates.

### **Fraud [investigation](#) by Wiltshire Police:**

Fraud is investigated in Wiltshire Police by four different business areas:

- Community Policing Teams (CPT),
- Criminal Investigation Departments (CID),
- Safeguarding Adults Investigation Team (SAIT) and
- Complex Fraud Team (Wiltshire Fraud Niche allocation inbox)

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The [Fraud Allocation Matrix](#) is applied at the earliest stage by either the Crime Recording Supervisors or the Complex Fraud Manager. The FAM was designed to give some clarity to fraud investigators on which business area deals with the reported crime. It works on a point based system to identify where an investigation might require specialist investigative resource.

All frauds that are reported or disseminated to Wiltshire Police are investigated to a conclusion, whether that be a

- sanctioned outcome,
- no further police action due to a lack of evidence, support,
- not being in the public interest or
- more appropriate for investigation or intervention from partner agencies.

All outcomes are currently reported back to the National Fraud Intelligence Bureau by our Crime Registrars Department.

Reports investigated by the Wiltshire Police are also subject to consideration of the principals set out in the '[Fraud Investigation Model](#)' (FIM). FIM is an extension to the principals set out in the [Authorised Professional Practice on Investigation](#).

FIM takes into account the unique nature of fraud crime types and considers that the period of harm to victims can be far greater in frauds than in other crime types. The aim of the FIM is to disrupt and protect at the point of reporting to stop the victim suffering further loss.

All investigations will be conducted in line with APP Investigations and the [Hierarchal Crime Review Procedure](#).

### **ACTION Fraud:**

With the exception of crimes meeting the 'call for service' criteria (see below) police can advise the victim to report fraud to Action Fraud directly via the contact centre using the contact telephone number or on-line reporting tool.

Action Fraud allocate crime for investigation based on these 5 principles:

1. The police force area covering the location of the fraudulent operation/ suspect's address or for Business related fraud the office address of the employee or if no office address, the Head Office of the company.
2. The police force area with the greatest number of individual usages or offences
3. The police force area where the first offence was committed
4. The police force area where the victim resides or works.
5. In the unlikely event that it is impossible to determine a Force Area using these principles the NFIB will determine a Force Area.

**Offences not recorded by Action Fraud** (Do **NOT** report the following fraud offences to Action Fraud):

- making, supplying or use of articles to commit fraud\*
- possessing/controlling article(s) for use in fraud\*
- possession of false documents\*
- making off without payment/bilking\* (forecourt crime)

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- forgery or use of drug prescription\*
  - fraud or forgery relating to vehicle or driver records\*
  - other forgery\*

(\* these are **not** recorded by Action Fraud)

All the above offences are recorded within Force where the offence has been committed under the respective Home Office Counting Rule codes.

### **Call for Service (CFS):**

In general terms a 'call for service' is a report that requires a response from the police. In the case of fraud the Home Office Counting Rules (HOCR) define the circumstances that should be treated as a call for service.

Reports received from members of the public that they have been a victim of Fraud. The call handler will THRIVE+ the incident and those which meet the call for service criteria will be allocated to the most appropriate department (see [Fraud Allocation Matrix](#)). The call for service criteria is defined as follows:

- The victim is considered vulnerable or they are at risk
- There is a known local offender (i.e. resides in Wiltshire and identity can be determined relatively simply)
- The crime is ongoing or has recently occurred (i.e. are there time bound investigative leads – e.g. CCTV, ANPR enquiries etc.).

If any of the CFS criteria applies the crime must be investigated as appropriate. If the Call for service criteria is not met the call handler will not create a contact record, but refer the caller to Action Fraud, unless they are Vulnerable or at Risk.

### **POLICY AIM**

This policy sets out the way in which reports of fraud are managed within the Force to ensure consistency and maximise efficient use of resources. The policy provides a clear and consistent approach in assessing the vulnerability of all victims of fraud to ensure effective support for vulnerable victims.

### **APPLICABILITY**

All police officers and police staff who receive reports of fraud or who may be required to investigate fraud allegations.

### **LEGAL BASIS AND DRIVING FORCE**

Fraud Act 2006  
Proceeds of Crime Act 2002  
Equality Act 2010  
Human Rights Act 1998  
Data Protection Act 2018  
Freedom of Information Act 2000

### **RELATED POLICIES, PROCEDURES and OTHER DOCUMENTS**

[Fraud Investigation Model \(FIM\)](#)

[Fraud Allocation Matrix](#)

[Crime Allocation Policy](#)

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[Hierarchal Crime Review Procedure](#)  
[Recovery of Criminal Assets Policy](#)  
[Seizure and Retention of Money Procedure](#)

## **AUTHORISED PROFESSIONAL PRACTICE**

[APP > Investigation](#)

APP > Investigation > [Investigating Fraud](#)

## **DATA PROTECTION**

Any information relating to an identified or identifiable living individual recorded as a consequence of this policy will be processed in accordance with the Data Protection Act 2018, General Data Protection Regulations and the [Force Data Protection Policy](#).

## **FREEDOM OF INFORMATION ACT 2000**

This document will be classed as suitable for public release when the final draft has been adopted.

## **MONITORING AND REVIEW**

This procedure will be reviewed every two years in the light of any national policy or procedural change or due to changes to law or Force strategy or at such other times as may become necessary. Any review will take into consideration feedback/lessons learned from fraud investigations.

## **WHO TO CONTACT ABOUT THIS POLICY**

The Superintendent Head of HQ Crime is responsible for this policy. All queries relating to this policy should be directed to the Accredited Counter Fraud Manager (Wiltshire Police Complex Fraud Team) or the Force Policy Officer.

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## DOCUMENT ADMINISTRATION

### Ownership:

Department Responsible: HQ Crime - Complex Fraud Unit  
Policy Owner/Author: Supt. Head of HQ Crime / Accredited Counter Fraud Manager  
Technical Author: Force Policy Officer  
Senior Officer/Manager Sponsor: ACC Crime and Justice

### Revision History:

Revision Date	Version	Summary of Changes

### Approvals:

This document requires the following approvals:

Name & Title	Date of Approval	Version
Continuous Improvement Team	20.12.2019	0.5
ACC Crime and Justice		
JNCC (Not required for all policies)	N/A	

### Distribution:

This document has been distributed via:

Name & Title	Date of Issue	Version
E-Brief		
Email to relevant affected Staff/Officers		
Other: (state method here)		

### Diversity Impact Assessment:

Has a DIA been completed? If no, please indicate the date by which it will be completed. If yes, please send a copy of the DIA with the policy to the Force Policy Officer.	<input checked="" type="checkbox"/> <b>Yes</b> <b>Date:</b>	<input type="checkbox"/> <b>No</b>
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### Consultation:

List below who you have consulted with on this policy (incl. committees, groups, etc):

Name & Title	Date Consulted	Version
Supt. Sarah ROBINSON, Supt. Adrian BURT, Supt. David MINTY	02.12.2019	0.4
Supt. Ben MANT, Supt. Steve KIRBY, John FLYNN	02.12.2019	0.4

### Implications of the Policy:

#### Training Requirements

No additional training requirements.

#### IT Infrastructure

No additional IT infrastructure required.