

# FRAUD ALLOCATION AND INVESTIGATION POLICY

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## FRAUD ALLOCATION AND INVESTIGATION

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## Legal Basis

### Legislation specific to the subject of this policy document:

- Fraud Act 2006
- Theft Act 1968
- Criminal Procedure and Investigations Act 1996 (CPIA)
- Proceeds of Crime Act 2002 (POCA)
- Economic Crime and Corporate Transparency Act 2023

### Other relevant legislation which you must check this document against (required by law)

- [Human Rights Act 1998 \(in particular A.14 – Prohibition of discrimination\)](#)
- [Equality Act 2010](#)
- [Crime and Disorder Act 1998](#)
- [Health and Safety at Work etc. Act 1974 and associated Regulations](#)

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- [General Data Protection Regulation \(GDPR\) and Data Protection Act 2018](#)
- [Freedom Of Information Act 2000](#)
- [The Civil Contingencies Act 2004](#)

## Other documentation which you must check this document against:

- Investigation of Fraud and Economic Crime (Blackstone's Practical Policing, Michael J Betts)
- Fraud: Time to Choose. An inspection of the police response to fraud. HMICFRS
- [College of Policing – Code of Ethics](#)
- [Norfolk and Suffolk Constabularies' Standards of Professional Behaviour](#)
- [College of Policing – Authorised Professional Practice](#)
- Investigations Policy (Norfolk)

## 1. Introduction

- 1.1 Fraud and economic crime represent a significant threat to communities across the United Kingdom (UK). It is recognised that the volume of fraud impacting on the UK is growing in complexity and diversity.
- 1.2 Fraud has become a global issue and the reach of offenders has increased through the use of new technologies, enabling traditional crime to be committed in new ways through the use of computers, computer networks or other forms of information communications technology.
- 1.3 In 2023/2024, the total cost to society of fraud against individuals in England and Wales was estimated at £14.4bn (Home Office, 2026).
- 1.4 Fraud accounted for approximately 45% of estimated crime in 2025 and was the most common crime type. (CP 1523 – Fraud Strategy 2026-2029 Disrupting crime, supporting economic resilience and delivering justice)
- 1.5 Fraud and economic crime represents a significant challenge to Law Enforcement organisations and investigators. Fraud is often made more complex by the range of enablers and mechanisms to conceal the movement of money and the true nature of the fraud. As well as fraud often being intrinsically linked to other crime types including those of an exploitative, organised or domestic nature, adding extra complexity.
- 1.6 Key challenges are assessed as relating to officer capability (training and knowledge), effective joint data opportunities (rich picture) and demand versus capacity.
- 1.7 This policy recognises the scale of fraud related offences, significant loss and impact to businesses and individuals, a proportion of whom are very vulnerable. This policy seeks to ensure that Norfolk Constabulary prioritises fraud investigations appropriately and supports national priorities.

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- 1.8 This document sets out roles and responsibilities, reporting structures, assessment process, the Fraud Investigation Model (FIM), established preventative mechanisms and resources.
- 1.9 It is every officer's responsibility to deal with fraud offences, and safeguard victims, in accordance with the procedures laid down in this document.

## **2. Aims**

2.1 The aims of this policy are to:

- Make clear the national structure in place to deal effectively with fraud investigation and Norfolk Constabulary's part in it.
- Define relevant roles and responsibilities.
- Provide clear ownership and direction for Norfolk Constabulary staff in understanding reporting structures, lines of responsibility and processes.
- Define Norfolk Constabulary's response to investigation of fraud related offences.

## **3. Statement of Policy**

- 3.1 This policy is supported by Norfolk Constabulary's current vision and values.
- 3.2 Norfolk Constabulary will ensure that the policing response to reports is in line with national guidance relating to Report Fraud reporting or local ownership.
- 3.3 Norfolk Constabulary has a duty to protect vulnerable people from crime and will ensure that the necessary mechanisms are in place to safeguard people from fraud.
- 3.4 This policy has been formally agreed via the approved policy development/review process. It will be maintained by the Safeguarding and Investigations Command in conjunction with the Central Policy Unit.
- 3.5 The policy is intended to promote equality, eliminate unlawful discrimination and actively promote good relations regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, economic or family status.
- 3.6 This policy outlines Norfolk Constabulary's criteria and the responsibilities of those involved in fraud recording, allocation and investigation processes.
- 3.7 Considering these factors, in line with the Assessment Criteria, will inform the decision-making process as to whether or not a case is investigated further:
  - Nature of the offence;

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- Characteristics of the victim, including vulnerability;
- Impact of the crime;
- Criminality of the offender;
- Resources available; and
- Potential success of the investigation.

3.8 All cases are recorded on Athena and, for those cases not being investigated further, a rationale must be provided on the Enquiry Log. Unless suitable for direct signposting to Report Fraud, this process will be explained further in the next section.

## 4. Reporting / Recording Criteria

### Vulnerability

- 4.1 Norfolk Police will create a STORM and Athena record (if required) for all reports made by or about a vulnerable victim and deploy resources to manage safeguarding to them.
- 4.2 If the allegation being made by them **does** meet the Call for Service criteria, the classification to be used is: **Crime Investigation – Report Fraud: Call for Service**.
- 4.3 If the allegation being made by them **does not** meet the Call for Service criteria, the classification to be used is: **Non-crime Financial Investigation**.
- 4.4 Report Fraud will escalate Safeguarding concerns for local victims reporting to them into Norfolk for management of the safeguarding concerns. There are three pathways that can be used for this:
- 1) Immediate Threat/Risk to victim – Report Fraud will report the concerns direct into CCR by phone for resources to be deployed immediately for safeguarding action.
  - 2) Non-immediate Threat/Risk to victim – Report Fraud will report the concerns direct into the Norfolk Fraud Team by email. The Norfolk Fraud Team will create a **Non-crime Financial Investigation** and allocate to the local team for an in person safeguarding/welfare visit to the victim and onward management of safeguarding action.
  - 3) Concerns / Vulnerability – Report Fraud will report the concerns via a Vulnerable Person Alert through the N-CAS Foundry system. The Norfolk Fraud Team will create a **Non-crime Financial Investigation** and allocate to the local team for an in person safeguarding/welfare visit to the victim and onward management of safeguarding action.
- 4.5 Vulnerable victims will be classified in accordance with the Victim's Code, i.e.:

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- Anyone under the age of 18 at the time of the offence.
  - Anyone who is suffering from a mental disorder within the meaning of the Mental Health Act 1983.
  - Those with a significant impairment of intelligence and social functioning.
  - Those with a physical disability or who suffer from a mental disorder.
  - In addition to the above, take into account the individual characteristics of the victim and/or the nature of the offending to which they have been subjected which may indicate that the victim is vulnerable. For example, an elderly person may be vulnerable due to their age (alone) or when considered together with the offences to which they have been subjected and the likelihood of such offences continuing.
- 4.6 Similarly, a person of any age may be vulnerable to particular types of fraud and their characteristics may make them more vulnerable to certain offences.
- 4.7 Officers and staff will adopt a broad approach in determining the vulnerability of a victim and do not adhere prescriptively to the classifications above.

## Call for Service (CFS)

- 4.8 The call for service criteria is as follows:
- An offence where the offenders are arrested by police; or
  - Where, at the time of the call for service, the offender is committing or has recently committed the offence/s (all fraud types); or
  - Where there is a locally known or easily identifiable suspect that, through viable investigative leads, the police have sufficient information to apprehend the offender.
- 4.9 Any reports of fraud meeting the above criteria will be recorded and investigated in Norfolk, unless proportionate and ethical to close at point of recording. If you believe a Call for Service crime is suitable for immediate closure, please contact The Fraud Team for review.

## Investigation Recording for Call for Service Classified Offences

- 4.10 The Athena Classification to be used for crimes that meet the Call for Service criteria is: **Crime Investigation – Report Fraud: - Call for Service**
- 4.11 There is a requirement within the Home Office Counting Rules (HOCR) for every Call for Service crime to have an independent fraud specific outcome code when finalised. Unlike other crime types, the Athena reference is not considered the crime number for a fraud offence under HOCR; rather, the Report Fraud URN provided to the Constabulary is the recognised crime number. The Report Fraud URN is recorded on Athena against the investigation number as a tag and we have to provide Report Fraud with the

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outcome code for that fraud offence when finalised.

- 4.12 For the purposes of data integrity and accuracy the crime classification of: **Crime Investigation – Report Fraud: - Call for Service** is to be recorded as a standalone classification and cannot be used as an included or secondary classification.

## Report Fraud Reporting

- 4.13 Where the call for service criteria is not met, the person reporting the offence will be advised to contact Report Fraud directly to make their report. This follows the national process. Record the details on the Fraud MS Forms form indicating whether they are able to report to Report Fraud themselves or not.
- 4.14 If the person is vulnerable, a STORM (system used for recording calls into the constabulary, and computer aided dispatch of officers to incidents) record will be created for deployment of resources to complete safeguarding action and provide appropriate advice and guidance. An Athena record should also be made to record this action. The Athena record should be recorded as a **Non-crime Financial Investigation** with an API/CPI as appropriate.
- 4.15 Report Fraud are the national centre for reporting non-Call for Service fraud offences and disseminating them out to the appropriate force area for investigation.
- 4.16 A report can be made to Report Fraud in several ways:
- via the online reporting hub 24/7: Reporting cyber crime and fraud or phishing attempts - Report Fraud,
  - by phone 24/7 on 0300 123 2040, or
  - via the live chat on their website 8am-8pm seven days a week.



reportfraud.police.uk  
0300 123 2040

## NFIB Dissemination

- 4.17 Fraud reported to Report Fraud is assessed through a solvability matrix and where it is deemed 'solvable' and most appropriately investigated within Norfolk Constabulary's force area, the National Fraud Intelligence Bureau (NFIB) will disseminate that report to Norfolk for investigation.
- 4.18 The Norfolk Fraud Team will receive the referral via the bespoke Report

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Fraud system (N-CAS Foundry), record the report on Athena, complete a desktop assessment of the report and allocate it out to the most appropriate team for investigation with an investigation plan in line with the Fraud Investigation Model.

4.19 The Athena classification used for these reports is: **Crime Investigation – Report Fraud: - NFIB Referral.**

### Outside of Reporting Criteria Above

4.20 Report Fraud do not record the following offences, which must not, therefore, be reported to them:

- Making, supplying or use of articles to commit fraud;
- Possessing/controlling article(s) for use in fraud;
- Possession of false documents;
- Make off without payment offences. (Any offending beyond a simple make off without payment, where a false representation is made and is assessed as a Fraud must be reported to Report Fraud);
- Forgery or use of drug prescription;
- Fraud or forgery relating to vehicle or driver records;
- Other forgery.

4.21 The fraud offence involves theft of motor vehicles or plant equipment. These must be referred to Report Fraud after a STORM log has been created and the vehicle/equipment circulated on PNC.

4.22 Direct any person wishing to report a fraud where a motor vehicle/plant equipment has been stolen to the Report Fraud contact centre after a STORM log has been created and the vehicle/equipment circulated on PNC.

### Banking Protocol

4.23 The Banking Protocol is a UK wide rapid response scheme developed by UK Finance and National Trading Standards allowing bank staff to alert police to suspected fraud.

4.24 If there is a suspect in or around the bank it will trigger a **Grade A** response.

4.25 If there is a victim due to meet the suspect it will trigger a **Grade B** response.

4.26 Outside of this the response will be dictated by the THRIVE factors at play.

4.27 The banking protocol can be viewed at Appendix A.

4.28 A more detailed overview of the protocol is available here.

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## Norfolk Workflow

- 4.29 The Norfolk Workflow and step by step guide can be found in Appendices B and C respectively. They have been created to provide supportive guidance as to the initial response and recording needed to reports of fraud.

## **5. Fraud Investigation Model**

- 5.1 The Fraud Investigation Model (FIM) is a framework used to manage fraud investigations, focusing on preventing harm, securing assets and gathering evidence.
- 5.2 The Fraud Investigation Model prioritises prevention and disruption opportunities which is key to restrict the success and duration of the fraud and discourages diversification and expansion by the fraudsters.
- 5.3 The Fraud Investigation Model should be used to structure the response to fraud investigations, highlighting and managing risk, whilst setting clear parameters for the scope and end game for the investigation and highlighting use of early disruption tactics.
- 5.4 Prevention – Considers the following four questions:
- 1) Who are the principal enablers?
  - 2) Who else could be at risk?
  - 3) What could have been done to reduce/remove risk?
  - 4) How can others be protected from being victims?
- 5.5 Disruptions – Considers and targets the four enablers:
- 1) Professional – consider referrals to partner agencies and regulatory bodies.
  - 2) Technical – consider liaising with Cyber Crime or request NFIB disruption.
  - 3) Financial – consider account disruptions, Account Freezing Orders
  - 4) Environmental – consider press release, Fraud Ambassadors.
- 5.6 All investigative strategies for fraud investigations should be set using the Fraud Investigation Model with clear reference to it in action plans recorded on Athena. See Appendix D.

## **6. Roles and Responsibilities**

- 6.1 There are currently local, regional and national structures in place for fraud related matters.
- 6.2 It is recognised that there should be a level of collaboration and partnership working across public and private sectors to combat economic and fraud

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## Contact and Control Room (CCR)

6.3 CCR staff are responsible for:

- Considering if the person reporting should be referred to their bank/ financial institution or Report Fraud.
- Creating a STORM log and deploying resources where the victim is vulnerable for appropriate safeguarding to be managed.
- Creating a Storm log and tasking resources to be deployed where a report meets the call for service (CFS) criteria.
- Creating a STORM log and deploying resources where the offence is:
  - Making, supplying or use of articles to commit fraud;
  - Possessing/controlling article(s) for use in fraud;
  - Possession of false documents;
  - Make off without payment offences;
  - Forgery or use of drug prescription;
  - Fraud or forgery relating to vehicle or driver records; or
  - Other forgery.

*(NB: Report Fraud will not deal with the above and these cases must not be referred to them.)*

- Referring frauds where a motor vehicle or plant equipment has been stolen to Report Fraud after a STORM log/occurrence has been created and the vehicle/equipment circulated on PNC.

## Investigating Officers

6.4 Investigating officers are responsible for:

- Considering the victims vulnerabilities in terms of their age, physical/mental health and circumstances and manage safeguarding action for them. Recording an API/CPI where appropriate and making relevant referrals.
- Considering if the person reporting should be referred to their bank/ financial institution or Report Fraud.
- If the report meets the call for service criteria:
  - Conducting a thorough investigation that will include taking statements and securing all available evidence including CCTV; and
  - Considering making an arrest if the offender is immediately available and it is in the best interests of the investigation. In such cases, advice and assistance can be obtained from officers within CID or the Fraud Team.

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- Applying the fraud investigation model to investigations and ensuring they manage the victim's expectations accordingly.
- Providing a detailed rationale on the crime for the decision as to whether a case will be investigated further or not.
- Where a case does not result in an investigation, delivering in person to the named suspect(s) a warning letter regarding their behaviour known as a 'cease and desist' letter, if appropriate.
- Where a case will not be subject of further investigation, informing the victim or reporting person (as appropriate) by person, telephone, email or letter to their home address.

## Fraud Crime Allocation of Investigations

6.5 The allocation of fraud investigations will be determined by the seriousness and complexity of the investigation. Complexity is assessed on the investigative action and tactics required and not on the value of loss.

## CPC Officers (PIP1)

6.6 CPC officers will manage the initial response to reports of CFS fraud, banking protocol alerts, the safeguarding response to vulnerable victims and the investigation of less complex allegations of fraud.

## District Crime Unit (DCU) (PIP1 with additional investigative experience)

6.7 DCU officers will manage the investigation of fraud with a greater degree of complexity and less complex investigations where a series has been identified.

## Safeguarding & Investigations CID/CAIU/AAIU Investigators (PIP2)

6.8 S&I officers will manage the investigation of serious and complex allegations of fraud.

## Safeguarding & Investigations SCDT Investigators (PIP2)

6.9 S&I SCDT officers will manage the investigation of the most serious and complex allegations of fraud where there is a clear OCG link.

## Norfolk Fraud Team

6.10 The Norfolk Fraud Team is responsible for:

- Reviewing crimes and ensuring that cases are recorded accurately in line with HOCA and national fraud standards.
- Reviewing crimes and completing a desktop triage to determine where the investigation will be allocated, if it should be investigated or there is no scope for onward investigation in line with the Fraud Investigation Model (FIM), recording their rationale for not pursuing an investigation.
- Adding relevant and proportionate investigative action plans on all fraud

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reports/frauds investigated by Norfolk Constabulary (and where appropriate and suitable, building on the OIC's initial actions set as part of the initial 8 Point Plan).

- Being the single point of contact for receiving requests from Report Fraud for cases to be evaluated and assessing them against HOCR, NCRS and this policy and, where appropriate, recording a crime record on Athena and allocating them to the appropriate investigative team.
- Reviewing crimes for transfer and completing the transfer process.
- Desktop evaluation and outcomes

## 7. 4P Plan Approach

- 7.1 The Norfolk Fraud Team has a 4P plan directing its activities and response to fraud which is updated periodically. The overarching 4P aims for the constabulary are as follows:

### Pursue

- 7.2 The aim of Norfolk Constabulary is that all perpetrators of fraud under investigation within the county will face the risk of prosecution, loss of assets and dismantled operations at every opportunity. All statutory enforcement and disruption options available to police and our partners will be explored to detect, investigate and disrupt criminality at the earliest possible stage, prosecuting those responsible and recovering assets.

### Protect

- 7.3 By working together in an effective collaboration with partners we aim to educate the public and businesses to prevent them becoming victims of fraud. By understanding our emerging threats, we will effectively drive targeted communications to help individuals protect themselves and reduce repeat victimisation.

### Prevent

- 7.4 The police and partnership approach will be to deter people from engaging in fraud by raising awareness of its devastating impact and showing that crime does not pay by marketing our successes.

### Prepare

- 7.5 Given the rapid increase in fraud, both cyber enabled and otherwise, investment has been made to the future staffing and resourcing of fraud management. In conjunction with our partners, we are ensuring an effective future response.

## 8. Partner Agencies

- 8.1 There are various partner agencies that also investigate fraud or may have

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information relevant to the investigation of fraud.

8.2 Some of these Partner Agencies are as follows:

- ERSOU (Eastern Region Special Operations Unit)
- National Crime Agency (NCA)
- The Serious Fraud Office (SFO)
- HMRC
- Trading Standards
- Local Council
- NHS
- Companies House
- The Environment Agency

8.3 If you would like more information about these agencies, or how they can support your fraud investigations, please contact the Norfolk Fraud Team.

8.4 Partnership working is also a key facet of the Protect strand of fraud management in Norfolk.

8.5 The Norfolk Against Scams Partnership is a multi-agency group who meet to coordinate targeted engagement with the businesses and communities of Norfolk to support the Protect and Prevent strands of the Fraud 4P plan.

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