

Exploring the Barriers to Policing Financial Crime in England and Wales

P. M. Gilmour

Exploring the barriers to policing financial crime

 Paul Michael Gilmour¹

¹. Faculty of Humanities and Social Sciences, Institute of Criminal Justice Studies, University of Portsmouth, Portsmouth, UK.
Email: paul.gilmour@port.ac.uk

ABSTRACT

The police service in England and Wales has been subject of much criticism in the past two decades over the policing response to financial crime. Many studies have reported failures in how the police investigate and prosecute financial crime, which have led to many victims being dissatisfied with the service provided by police. Yet, there has been little research into the barriers facing police investigators entrusted with tackling financial crime. This article reports on a study into such barriers, through surveys and interviews with investigators that aimed to better understand the challenges faced by police forces within England and Wales. It demonstrates several overriding practical and cultural issues that inhibit the success of investigations. The article concludes that police need a better appreciation of financial crime, to help improve the service delivered to victims, and to prioritize this often-undervalued field of policing.

Introduction

The investigation of financial crimes, such as fraud and money laundering, by police forces in England and Wales has been subject of much criticism. A recent study by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) concluded that the policing response to fraud is ineffective, with victims of fraud often left dissatisfied with the quality of the police's investigation into fraud (HMICFRS, 2019, p. 7). Less than 3% of fraud reported to police between 2017 and 2018 led to any type of positive outcome, such as a charge, summons, caution, or community resolution (Skidmore *et al.*, 2018, p. 3). These statistics are especially disappointing considering that fraud and related computer crimes accounted for almost half of all crime in England and Wales in the year ending December 2019 (Office for National Statistics, 2020). Indeed, the Crime Survey for England and Wales, documented nearly 3.5 million fraud offences by the end of 2018 (Bossler *et al.*, 2020, p. 312). However, this is likely to be an underestimation of the true figure of the volume of fraud as not all cases of fraud are reported, let alone detected; fraud is inherently deceitful, and goes largely unseen (Jones, 2004; Button and Gee, 2013).

Financial crime investigations encompass a wide scope of acquisitive crime types. Gottschalk (2010) provides a useful overview, defining financial crime as '... crime against property belonging to another to one's own personal use and benefit' (p. 441). He explains that financial crime incorporates, not only, corrupt acts (such as bribery) and theft of petty cash, art, and intellectual property; but also, counterfeit currency; tax evasion; money laundering; cyber-crime; and fraud, such as the misuse of bank cards, deceitful mortgage applications, and corporate frauds committed internally by employees and externally against employers (Gottschalk, 2010, pp. 443–455). Online frauds, in particular, represent the most commonly reported financial crime type, possibly because offenders can target more victims concurrently across the globe, than traditional fraud types, like cheque fraud or document forgery (Bossler *et al.*, 2020, p. 311). Although relevant to other acquisitive crime types, like burglary, robbery, blackmail, and modern slavery offences, most mainstream police investigators will likely associate their experiences of financial crime investigations with fraud (Gottschalk, 2010; Middleton *et al.*, 2019).

Many financial crime investigations fall under the responsibility of police personnel within non-specialist 'criminal investigation departments' (CIDs) operating at local level. Yet, not all police investigators receive specialist train-

ing. Most police personnel tend not to have the specialist capability or awareness to effectively investigate financial crime compared to those within dedicated Economic Crime Units (ECUs), whose sub-specialties may include fraud, asset recovery and money laundering. Furthermore, police forces no longer have the luxury of such previously separate sub-specialisms, as more have been engulfed into centralized ECUs or even abandoned completely because of budget cuts and shifting policing priorities (HMICFRS, 2019, p. 11). Staff in public-facing policing roles, such as response, roads policing, for example, are unlikely to have received any bespoke training into financial crime.

Bespoke training, like the Specialist Fraud Investigator course delivered by the City of London Police's Economic Crime Academy; or the Financial Intelligence Officer's and Financial Investigator's (FI) courses which deal with many aspects of financial crime and train and accredit staff in powers under Proceeds and Crime Act (POCA) tend to only be reserved to staff serving within dedicated ECUs (Bullock, 2010; Chave, 2017). Bossler *et al.* (2020) studied the preparedness of constables and sergeants in dealing with online fraud and found that those on mainstream front-line duties felt less prepared to respond to online fraud than those in specialist teams, which may explain officers' unwillingness to investigate reports and subsequent inexperience in such cases. This will likely remain problematic as crime becomes more globalized and criminal evidence needing security by the police, more digitalized.

Moreover, the sheer volume of fraud cases and increasing sophisticated methods through which criminals operate places a growing demand on an already limited police resource (Button *et al.*, 2015a). According to Home Office statistics, <1% of all police officers in England and Wales are currently dedicated to investigating financial crime (Shepherd, 2020, p. 1). The police service in England and Wales has also seen significant government cuts to policing budgets during the last decade, which has led to many forces having to prioritize cases involving victims deemed at greater risk of immediate physical harm over others in an attempt to protect the most vulnerable (Button *et al.*, 2015a, p. 130; see also Doig and Levi, 2013, pp. 149–150). It is evident that police staffs are now increasingly burdened with greater workloads, while less attention is given to investigating financial crimes. Despite this trend, little is known about the barriers that police face in investigating such crimes.

This article will explore the barriers facing police (warranted officers and non-warranted members of staff) in investigating financial crimes, which should be considered to better understand what can be done to improve the policing response to such crimes. It will examine the practical and cultural factors inhibiting the success of these investigations that, consequently, hinder victims receiving justice. However, it will be useful at this stage to discuss the background to the investigation of financial crime within England and Wales.

The policing response to financial crime

Historically, the approach to policing financial crime has often been haphazard. In 2005, the UK government commissioned a large-scale review towards addressing the emerging fraud problem. This review was driven by the rising cost of fraud on the national economy and concerns over policing resources and competing crime priorities (Doig and Levi, 2013). An interim report published in 2006 identified several flaws in the national approach to tackling fraud. Apart from recognizing that there was no national fraud strategy, the Fraud Review found that the police were unlikely to investigate lower-worth corporate frauds because of diminished police resources. It also found that fraud intelligence was inadequate, the investigation of fraud was fragmented, prosecutions of fraud were limited and burdensome, and convicted fraudsters often received little sanction by the judiciary (Doig and Levi, 2013, p. 146; see also Doig, 2018, p. 985). Consequently, widespread reforms in policy were launched and such reforms continue to be developed today.

These reforms involved the City of London Police force being designated as the 'National lead force' in investigating fraud in an effort to identify and promote best practice and solidify police resources and skill dedicated to fraud (Doig and Levi, 2013). The National Strategic Fraud Authority, later renamed the National Fraud Authority, an executive body of the UK's Home Office, was also created to measure the national scale of fraud and devise strategies to protect the UK's economy from the increasing threat from fraud (King and Doig, 2016, p. 904). A national fraud reporting service (now known as 'Action Fraud') was also set up, solely responsible for recording victims' reports of fraud and cybercrime and disseminating them through the City of London's Police's National Fraud Intelligence Bureau, before potentially passing to regional and local forces for investigation (HMICFRS, 2019). The wide-

scale reforms arising from the 2006 Fraud report demonstrated much-needed impetus to improve the investigation of economic crime and in standardizing how economic crime is policed.

However, despite these reforms, concerns surrounding the lack of improvement in how police tackle fraud remain (Fraud Advisory Panel, 2017). The charity organization, Fraud Advisory Panel, highlighted in a recent letter to the UK government that police forces across England and Wales, outside the City of London, are still largely ineffectual at dealing with fraud and vary in approach to tackling it (Fraud Advisory Panel, 2017). It is well reported that fraud is not considered by many police forces to be a priority crime, which may explain why many police officers view fraud as outside their responsibility (Frimpong and Baker, 2007; Button *et al.*, 2011; Skimore *et al.*, 2020). For Crocker *et al.* (2017, p. 4), despite the increasingly organized nature of fraud, the policing response to fraud falls short of equaling its occurrence and the harm that it causes to local communities. Better training may help improve awareness and perceptions of this frequently misunderstood field of policing.

Much of the ongoing training that police receive relies on an e-learning platform known as the Managed Learning Environment (MLE), provided by the National Centre for Applied Learning Technologies (NCALT) as an alternative means to classroom training. It is widely recognized that police officers and staff must engage in continual professional development to meet the increasing demands of operational policing (Alexandrou and Davies, 2002; College of Policing, 2018; Honess, 2020). The MLE online platform is flexible in terms of content delivery and does not require face-to-face instruction. It also allows training packages to be easily distributed in a manner in line with changing operational demands (Honess, 2020, p. 3). However, Honess (2020) found that most officers are dissatisfied with their ongoing training provision and feel that the MLE platform, which often involves mandatory training packages, does not fulfil their needs. His study observed that officers were often unmotivated to complete mandatory e-learning courses, claiming that its content is neither useful nor interesting (Honess, 2020, p. 7). It is important that any ongoing police training is valid, relevant, and engaging.

The literature suggests that neither initial police recruits nor trainee detectives are trained to any depth in how to investigate financial crimes. A latest study by Perpetuity Research and the Police Foundation found that over three-quarters of police personnel felt they needed more training to tackle fraud (Miller, 2018, Para. 4). For Chave (2017, p. 441), accredited FIs' knowledge tends to be limited to an understanding of basic money-laundering offences, as legislated by the POCA 2002. He argues little is known about emerging criminal methods, for example, the role of cryptocurrencies in fraud and money-laundering schemes, or about informal banking arrangements, like Hawala (Chave, 2017, p. 441). Similarly, Bullock (2010, p. 8) argues, FIs have little knowledge of their available powers under POCA to investigate and recover criminal proceeds. Effective guidance is vital to the success of cases because those within the police must understand how to investigate and detect financial crimes, and to confiscate criminal proceeds.

The plethora of differing investigative models and initiatives used by police forces also do not help towards ensuring a consistent approach to policing fraud. Numerous manuals previously published by the now defunct Association of Chief Police Officers (ACPO) of England, Wales and Northern Ireland covering an assortment of policing purposes have now been incorporated into The College of Police's Authorized Professional Practice (APP) website (College of Policing, 2020). However, little APP content appears to deal with fraud. In the author's experience, such content is also not widely publicized to investigative staff.

Bossier *et al.* (2020) highlight the worth of police forces establishing, applying, and publicizing useful strategies and guides for officers to enhance their response to online fraud. Their study demonstrates that promoting such guidance, even during team briefings, contributes towards an increased awareness of online fraud throughout the workforce and helps officers feel more prepared to tackle online fraud and support their victims. They add that further training is needed in fundamental computing, managing computer exhibits, and online resilience (Bossier *et al.*, 2020, p. 324). For Skidmore *et al.* (2020, p. 377), the police service has, thus far, failed to adjust to the increasing demands of crime, especially considering the growth of online crime. Implementing new training initiatives towards promoting best practice within the police service seems imperative so officers can better deal with evolving crime.

Importantly, the City of London Police, as the nation's lead force for fraud, helps to promote best practice through several initiatives, such as running the Economic Crime Academy and user groups and undertaking peer reviews; though, more action may be needed to ensure such initiatives recognize, consider, and share effective procedure (HMICFRS, 2019, p. 10). The City of London Police has also devised a Fraud Investigation Model (FIM) that offers a useful framework for preventing and investigating fraud, and in disrupting offenders (Betts *et al.*, 2017). The FIM further guides how an investigator may instigate a fraud case and considers what resources may be required

to do so. It also questions the role of partner agencies in assisting the police's approach in such cases. While the FIM is a welcome addition to the fraud investigators' repertoire, it offers guidance only as a simple tool. It does not provide in-depth procedural support and does not seem to be widely utilized by forces outside of the City of London Police (HMICFRS, 2019).

However, the National Police Chiefs' Council, the body which replaced ACPO, does recognize best practice in identifying and protecting vulnerable victims of fraud and cybercrime, through Operation Signature. This campaign, initiated by Sussex Police with the aim of providing additional support to vulnerable victims within local communities, establishes a regimented response to victims who report fraud and cybercrimes either directly to police or through referral from Action Fraud. The Operation Signature model has been successfully rolled out nationally, although, to varying degrees and forms (HMICFRS, 2019, p. 20; Sussex Police, 2020). Skidmore *et al.*'s (2018, p. 47) study found that only nine police forces have an intention to introduce a similar model locally due to an apparent lack of need and resources. This sentiment seems to be reflected by HMICFRS's (2019) study which concluded further assessment of Operation Signature and similar models is required to assist police forces to decide whether to resource them. A national approach that oversees victims' care, like that adopted by the Economic Crime Victim Care Unit (ECVCU), may be a better solution to dealing with the increasing volumes of victim reports and managing differing victim profiles across England and Wales (Skidmore *et al.*, 2018). Nonetheless, it should be noted that ECVCU only currently operates across three urban police jurisdictions: West Midlands, Greater Manchester Police, and the Metropolitan Police Service (Skidmore *et al.*, 2018).

Furthermore, victims' experience of fraud may be worsened by the criminal justice system's inadequate response, and police officers' poor attitudes towards fraud offences and victims. According to Levi *et al.*, (2017, cited in Bossler *et al.*, 2020, p. 312) victims are often directed to initially report their crimes to Action Fraud, unless it warrants urgent action; victims are often ignored and left feeling at fault for the crime happening. Regardless, of the crime type, the generalist police service remains the first point of call for victims (Bossler *et al.*, 2020, p. 314).

It is also important to note that businesses typify a significant proportion of those victimized by fraud. A total of 56% of UK businesses surveyed by PwC (2020) reported having experienced fraud losses, which for a fifth of those surveyed amounted to \$5 million. However, many businesses rely on their local police force to investigate fraud as the business often does not have the means to investigate and prosecute fraud themselves. Thus, the police frequently act as the only channel through which corporate victims can access justice, a process which is seemingly hindered by police's lack of resources and interest (Button *et al.*, 2015b, p. 164). Such difficulties have inevitably prompted victims to seek their own private prosecutions (Button *et al.*, 2015b; see also Button *et al.*, 2018).

Despite developments in the national approach to how financial crime is tackled, its approach apparently remains fragmented, with differing responses implemented across England and Wales. It seems evident that fraud is viewed as a lesser policing priority by many police forces, so officers involved in its investigation may perceive it as outside their scope of work (Button *et al.*, 2015a; Skidmore *et al.*, 2018). Yet, most fraud and other financial crimes are dealt with by officers at a local force level. It is against this backdrop that this study was undertaken, to better understand the barriers facing police in dealing with financial crimes.

Research methods

Although, it is widely documented that the policing response to financial crimes is ineffectual, there is little literature that seeks to understand what hinders the police's success in dealing with financial crimes. Therefore, an online survey was devised to collect the views of police personnel engaged in investigating and prosecuting financial crimes on a force-wide level. The survey was designed to incorporate a gamut of financial crime types as to not limit investigators' responses solely around fraud, thus, recognizing the wider scope of financial crime investigation (see Gottschalk, 2010; Middleton *et al.*, 2019). Questionnaires can help gather information from a large sample of individuals relatively inexpensively and simply (Semmens, 2011, p. 63). The survey was complemented by semi-structured interviews. Staffs were invited to participate in an interview either face-to-face or via telephone, which focused on deeper questioning around the barriers in investigating and prosecuting financial crimes. As Semmens (2011) argues, semi-structured interviews allow respondents to freely discuss their answers and enable the researcher to probe for explanations; thus, allowing for deeper insight into the topic. All participants were informed that their involvement in the research was voluntary and that the responses would be anonymized.

The survey was designed by the author and implemented through an online link for participants to visit. The survey collected data about participants' role, level of service, and the level of training received relating to financial crime investigation. The survey then asked questions around their knowledge of specific investigative procedures, including whether they understood how to conduct investigations into financial crimes, and where they would seek help if needed. The survey also questioned the investigative models that participants use. The survey then used a 10-point Likert scale to measure how staff would describe their knowledge of relevant legislation; for example, the Fraud Act 2006, POCA 2002, Bribery Act 2010, Theft Acts of 1968 and 1978, and lesser encountered laws, such as the Trademarks Act 1994 and Financial Services and Markets Act 2000. The survey then questioned the challenges facing staff in investigating and prosecuting financial crimes. This section used the 10-point Likert scale ('1 out of 10' being the lowest and '10 out of 10' being the highest rating) to measure whether they agreed or disagreed with various statements that aimed to understand their perception of financial crime, victims of financial crimes, the circumstances under which such crimes should be investigated and prosecuted, and the common barriers confronted in doing so. The survey then questioned participants' resource and training needs.

The survey link was disseminated to all police forces within England and Wales through the College of Police's 'POLKA' online platform and its new 'Knowledge Hub' member forums, and via email directly to nine forces' research leads. Responses were received over a 6-month period from late September 2019 to early March 2020 with regular prompts, and a total of 218 completed surveys were returned. The survey responses were compiled by the author's police force's corporate communications department and forwarded to the author for analysis. A total of five semi-structured interviews were also completed by the author: four face-to-face and one via telephone. These interviews focused on questions around the barriers to investigating and prosecuting financial crime with more opportunity for participants to freely discuss these issues. All data were then coded and thematically analysed through NVivo software to identify key themes by detecting, examining, and reporting patterns within the data (Vaismoradi *et al.*, 2013, p. 400). This provides a qualitative narrative through an impartial and a consistent method (Vaismoradi *et al.*, 2013, p. 400). As participants were able to provide free text in the survey responses, further attention was made to key themes (such as complex, interest, resources, and specialist) when interpreting the data. The search function within NVivo assisted in examining such patterns.

Findings

The survey was predominantly completed by police officers (78%). Nearly 40% of all respondents stated having had between 13 and 21 years' service, while a quarter reported having had at least 6 years' police service. Almost 60% of all respondents were of constable rank. A total of 30% of all respondents stated they worked in a generalist investigations department (such as a CID), 24% on front-line response, and 26% within a specialist investigations department (such as an ECU, Serious Organized Crime Unit, or Safeguarding Investigations Unit). The remaining participants reported working in other policing roles, such as the Missing Persons' Unit, Roads Policing Unit, the Dogs Unit, the Police Contact Centre (PCC), or similar.

Knowledge of investigating financial crime

The police's lack of knowledge around relevant legislation and investigative procedures emerged as a key theme in the research. Only 40% of all respondents reported understanding the processes through which frauds are reported to the police, and half of all respondents did not understand the role of Action Fraud. This was evident in the following remarks.

There is a case I was involved with where investigations took their time in sending the case to Action Fraud and when they did, it took Action Fraud 3 weeks to say that it should not be sent to them and that we need to make a request to the police force of where the suspect lives instead. I do not really see any benefit of sending any jobs to Action Fraud (respondent 11, police community support officer (PCSO) on a neighbourhood prevention team).

In addition, in my experience, reports received from Action Fraud [...] are woefully inadequate and are quite frankly not worth the paper they are written on (respondent 52, trainee detective constable on a CID).

Within the Contact Centre, all callers are referred to Action Fraud unless there is a call for service - i.e. locally named suspect/vulnerability identified from OP Signature questioning. To be honest I do not even know what Action Fraud do with the reported information. Even where there may be a line of enquiry, we are still referring the caller to Action Fraud, because there is no locally named suspect. Often victims complain about the lack of response from

Action Fraud, and our hands are somewhat tied in relation to this. I have some knowledge around the Fraud Act, but training is limited and there are no real refreshers in this area (respondent 61, member of staff in the PCC).

Most respondents indicated they knew how to make requests for information under the Data Protection Act; however, 44% stated they had no knowledge on how to complete international requests. A quarter of respondents stated they had no knowledge of how to complete court production orders for banking evidence. A quarter of respondents also reported having no knowledge in dealing with material subject of Legal Professional Privilege (such as correspondence between a lawyer and their client). Only 14% of all respondents claimed to have no knowledge whatsoever on how to seize financial evidence (e.g. cash). Most respondents (77%) indicated they would ask their immediate colleague for advice and 16% stated they would simply 'search Google' for the answer. One respondent stated,

Fraud is an area of investigation which the vast majority of police officers have little or no experience investigating (respondent 20, detective constable, on a specialist investigations department).

Regarding what investigative model staff respondents use, less than a quarter reported that they would employ the FIM to guide their investigations, while 19% stated they did not know what model they would use. One respondent commented,

The FIM has been around for several years yet hardly anyone on [force's investigations department] about it or how it can help direct, prioritise, or even just do prevention/disruption in fraud allegations. Big Fail!!!! (respondent 22, detective sergeant on a CID).

When asked what partner agencies had been actively involved in their last investigation into financial crime, most said that a bank was involved, while 32% stated that no other body was involved. Apart from banks, the most frequently consulted agency was their local authority social services.

Notably, knowledge of relevant legislation also varied. The participants reported having most knowledge around the Theft Acts of 1968 and 1978. Only 15% of respondents rated their knowledge of the Fraud Act 2006 as 'eight out of ten' on the 10-point Likert scale. Nearly 38% stated they had no knowledge of the new Bribery Act 2010, and 15% of all respondents rated their knowledge of POCA 2002 as only '3 out of 10'. Over half of all respondents (56%) stated that they had no knowledge in the Financial Services and Markets Act 2000, Trademarks Act 1994, Insolvency Act 1986, Consumer Protection from Unfair Trading Regulations 2008, or Companies Act 2006.

Lack of training in how to investigate financial crime

Inadequate knowledge surrounding investigative processes and legislation reflects the lack of training respondents reported as having received. A total of 29% of respondents reported having received no training related to investigating financial crime. Almost 40% of all surveyed stated that the only training received relating to financial crime was during their initial police recruitment. In nearly 40% of respondents, all investigative training delivered had been via online e-learning packages. Only 16% reported receiving continuing professional development (CPD) relating to financial crime and only 14% had attended a specialist course. The lack of adequate training is further evident in the following comments.

As a DC, we have had absolutely no input from any Department during my training to become a DC or since, relating to economic crime (respondent 18, detective constable on a CID).

Absolutely frauds should not be investigated by front line police officers. I and much like many of my colleagues have received no formal training (respondent 22, detective sergeant on a CID).

In my opinion, lack of training and lack of equipment are the most significant problems in fraud investigations (respondent 78, detective constable on a CID).

Training in fraud investigations is lacking. Most of my learning has been through failing miserably or ploughing through it (or googling it!) (respondent 152, police staff investigator on a specialist investigations department).

Better training how to interpret financial evidence and how to trace money [is needed] (interview 2, detective constable on a CID).

Participants demonstrated hostility towards e-learning, particularly NCALT, and reported that they would rather receive face-to-face training in the classroom.

No more NCALT, I already have plenty of mandatory NCALT packages that I haven't completed and struggle to find the time to complete, so when I do it's rushed and lacks value (respondent 29, police constable on front-line response).

Investigators knowledge of what help they can get from ECU FIU needs to be raised - not on an NCALT package or the intranet. But with face to face training and a case study to explain the tools available (respondent 40, member of staff on a specialist investigations department).

Training is definitely required, but in person NOT NCALT or simply information on the Intranet (respondent 79, detective constable on a CID).

I do not believe that this can or should be taught via NCALT packages we need proper training but trained professionals whether Police Officers or Lawyers (respondent 157, detective constable on a specialist investigations department).

I learn from a classroom base not NCALT (respondent 166, police sergeant on front-line response).

Poor perceptions of fraud and attitudes towards victims of fraud

Given the lack of training and knowledge around financial crimes, many respondents reported being fearful of conducting investigations into such crimes.

I have personally dealt with very few financial investigations and therefore my confidence in dealing with them and my knowledge is very limited. I am also rubbish with figures and therefore financial investigations, if I am honest, scare me (respondent 82, member of staff on a specialist investigations department).

[Officers think] 'Oh god it's a fraud', [there is] fear of the unknown (interview 1, police sergeant on a corporate development department).

Production orders are scary (interview 2, detective constable on a CID).

The research also identified that many respondents have experienced financial crime investigations to be time consuming and complex, and consider that these crimes should be investigated by a specialist.

This is a specialist role and to suggest otherwise is misguided. These crimes should be dealt with by specialist officers or CID in order to give the victim a proper service (respondent 114, police constable on front-line response).

Investigating fraud is complex, highly time consuming (respondent 129, police constable on front-line response).

Frauds are often lengthy and time-consuming investigations that often involve external agencies or private companies with processes that are unfamiliar or completely unknown to police. Speaking entirely for myself I absolutely dread these investigations because they often involve a large amount of third party material and it is difficult to follow the trail of the money or property in order to ascertain if an offence has taken place and then to prove it. There is a complete lack of training on division in respect of this crime and often there is a reliance on supervisors and colleagues to help (respondent 148, detective constable on a specialist investigations department).

The perception of fraud was overwhelmingly negative. Many respondents reported that fraud was not a priority.

I really do not like fraud investigations, they are complex, and vary rarely seem to meet an evidential threshold and often seem to be better resolved as civil matters (respondent 8, police sergeant on other department).

Fraud has never interested me, but that said, it does not seem to interest many people; and as a result, it is definitely a poor relation when it comes to criminal investigation (respondent 118, police sergeant on a MASH).

Fraud is impossible to investigate on the [department]. We do not have enough time and demand is FAR too high, this will be bottom of the list (respondent 173, police sergeant on front-line response).

This negative sentiment extended to fraud victims. One respondent reported,

They expect us to do everything, solve all their issues and many times do not assist well at all, as they believe we should know it all (respondent 2, police constable on front-line response).

The perceived lack of support from fraud victims was also reported as being a barrier.

Many victims have a completely unrealistic attitude towards what we can achieve. Their basic standpoint is—I refuse to accept I could have done anything to prevent this, I refuse to accept that I should pay for a proper accountant to forensically examine this and I utterly refuse to accept that my own stupidity is responsible—so here, have a big bundle of unsorted documents and call me when you've got my money back. Ridiculous (respondent 34, police sergeant on front-line response).

Some victims are not aware that they are victims in some cases therefore are unwilling to support (respondent 66, police constable on front-line response).

Victims often simply wish to recover their losses, and therefore do not wish to go to court. Yet they will only raise an issue close to the conclusion of the investigation, stating they will not go to court and give evidence (respondent 90, detective constable on a specialist investigations department).

Resourcing and practice issues dealing with financial crime

As previously demonstrated, police reported lacking the knowledge and training to effectively investigate financial crime. Respondents perceived financial crime negatively, reporting that it is complex and time consuming to investigate. The results overwhelmingly demonstrate that it is not a priority. Furthermore, respondents reported that inadequate available resources hinder their ability to respond to financial crimes.

Frontline response officers do not have the resources or time in investigate fraud (respondent 177, police constable on front-line response).

I find fraud really interesting as a crime type, but I just don't understand it well enough to confidently execute an investigation, and often it is so low level if the victim won't support with additional information it's just not viable to continue with considering our workloads. We have 3 1/2 DCS. Two of which are TDC and we should have 7. Staffing is a massive barrier and prevents further training too (respondent 201, member of staff on a CID).

Respondents also reported a lack of managerial support.

There is a lack of interest from supervisors to investigate these offences and when THRIVE is taken into consideration, fraud appears low (respondent 17, detective constable on a specialist investigations department).

Senior Managers pay lip service to the importance of providing resources to fraud investigations (e.g. disclosure officers) but the reality is that the [department] I work within is under resourced and I do not believe that fraud is a priority. On the same date that our force was championing the need for effective Disclosure Management, our Disclosure officer role within [department] was cut and Disclosure officers across the force were also significantly reduced (respondent 59, detective sergeant on a specialist investigations department).

There is so little support from management to investigate fraud - the attitude from them reflects how little knowledge/experience they have (respondent 129, detective constable on a CID).

However, there were other reported barriers to investigating financial crime. The overly arduous task of complying with disclosure rules was cited as being problematic, as was the lengthy action plans requested from the Crown Prosecution Service (CPS) which officers were tasked with. Respondents also experienced problems in receiving evidence from banks and issues in exhibiting that evidence. They also reported challenges arising from recent changes to police bail.

I do not think we have enough knowledge to investigate most frauds, the problems are at every level: 1) the banks do not support us because it makes them look bad. They refund the money and then the victims lose interest. The banks should refund and then support an investigation. Who is the loser? The bank or individual? 2) Exhibiting financial data is difficult. How do we take bulk data and extract the parts we need? 3) CPS do not like to review cases that

involve bulk data. Just transferring the evidence to CPS in electronic form is difficult due to data file sizes (respondent 144, police constable on other department).

There seems to be a reluctance to arrest suspects early on as both a preventative measure whilst securing evidence; partly exacerbated by the foolish updates to the bail legislation making it practically more difficult to bail suspects (respondent 44, member of police staff on a specialist investigations department).

Discussion

This research has identified several key barriers facing the police in investigating financial crimes. The study indicates that police lack the knowledge required to successfully investigate and prosecute financial crimes. There are inadequacies in understanding police processes related to financial crime, including how fraud reports are handled and the role that Action Fraud plays in this procedure. The research suggests that staff believe that Action Fraud is involved in investigating fraud, rather than simply acting as a fraud reporting centre (HMICFRS, 2019). Respondents reported sending fraud cases to Action Fraud, perhaps with expectations that Action Fraud would investigate, which may explain delays in investigations and discontent experienced by victims. Such confusion may lead to conflicts over which investigative body has primacy over the investigation of fraud. These findings suggest that despite the existence of Action Fraud for over a decade, its purpose remains misunderstood by many staff who deal with fraud reports, and demonstrates that further information and training needs to be provided for staff. Police also lack the knowledge of relevant legislation. It is evident that greater training in financial crime is required.

The study supports Honess' (2020) research that staffs benefit from face-to-face training more than mandatory e-Learning. Staffs surveyed do not consider NCALT packages as suitable and lacking value of interactive classroom provision, especially considering the demands of financial crime investigation. The research demonstrates that, not only, is initial police training inadequate, but also, CPD opportunities are lacking. These findings support recent research conducted by Perpetuity Research and the Police Foundation (see Miller, 2018). Further training around investigative models including the FIM may also strengthen police's competence and provide much needed direction to their investigations. However, the police service should go further to properly prepare the workforce in dealing with financial crime. This research reinforces recent studies that advocate for the dissemination of training material which enhance the workforce's confidence in dealing with financial crime to support their investigations and victims (see Bossler *et al.*, 2020). This is key considering the police's increasing management of technology and exposure to online fraud, as the service tries to adapt to growing demands of modern policing (Skidmore *et al.*, 2020).

A key issue, however, seems to be staff's poor perception of financial crime investigations generally. This seemed most evident in the respondents within a front-line response role. Most staff surveyed felt that they are complicated and time consuming to undertake. The research also supports the notion that many within the police do not view financial crime as a policing priority (Button *et al.*, 2015a). This may explain unnecessary delays in investigations, as officers dedicate more time to other crime that are viewed as simple and worthy of their attention, resulting in frauds being left at the 'bottom of the pile'. Many generalist investigative officers viewed fraud as a 'specialist' crime required specialist skills, which may justify why they consider it to be out of their remit (Button *et al.*, 2015a; Skidmore *et al.*, 2018). This did not seem the case for investigators within specialist departments (e.g. ECU) who are more experienced in and responsible for investigating such crime. Nonetheless, the lack of police resources dedicated to investigating fraud likely impacts upon the police's ability to prioritize fraud considering their surmounting work pressures.

However, the negative sentiments towards financial crime extend to victims of such crimes. Some of the staff surveyed reported that victims were themselves a barrier to the investigation of financial crime. The research suggests that this is because victims may have unrealistic expectations of the police's ability to prosecute their case, or skill to recover their money lost to fraud. Victims may also not understand what evidence is helpful in a fraud case. However, it is incumbent on the police to support victims of financial crime through better training, knowledge, and investigative skills to tackle this frequently misunderstood crime. Although, the literature widely documents the police service's limited means to tackle financial crime (e.g. Doig and Levi, 2013; Button *et al.*, 2015a; HMICFRS, 2019), attitudes towards financial crime and its victims need to change. The findings of this research support the notion that unless further training is cascaded throughout the entire police workforce, front-line investigators will be ill prepared and unwilling to respond to victims' reports of crime (Button *et al.*, 2015b; Bossler *et al.*, 2020). This will only further discourage victims from reporting financial crimes with the belief that police are not interested and, conse-

quently, contribute towards its underreporting. The demonstrated lack of knowledge and training seems to be a significant factor in investigations' success and, consequently, the service provided to victims.

Further barriers facing staff in investigating and prosecuting financial crimes are evidenced. The lack of support from police managers, perhaps exacerbated by managers' lack of knowledge of and attention to financial crimes, seems to be an issue which hinders staff in dealing with their investigative workload. It is important that staffs receive the practical and intellectual encouragement to tackle financial crime. The study further suggests that better collaboration with outside agencies, such as CPS, and banking sector institutions is required to support and enhance ongoing investigations into financial crime.

Conclusion

This article demonstrates that police forces in England and Wales face difficulties in investigating financial crimes, which may explain why police forces in England and Wales have been criticized for failures in cases (HMICFRS, 2019; Office for National Statistics, 2020). This article has shown that police personnel do not have enough expertise to investigate and prosecute financial crimes successfully. Greater training is needed in this field to enhance investigators' ability to tackle financial crime. Further initial training and ongoing development will, not only, strengthen the police's competence in tackling financial crime, but also, improve the police workforce's resilience in meeting growing operational demands (Bossler *et al.*, 2020; Honess, 2020). Better training will also improve how this area of policing is perceived. Victims of fraud and other financial crimes need the full support of the police, especially considering the increasing volume of frauds reported to police each year (Button *et al.*, 2015a). Such training should focus on ensuring officers know the relevant legislation, how to conduct investigations, and understand the role of other important bodies, such as Action Fraud and other investigative or prosecution agencies. Training materials should be cascaded throughout the police workforce to support investigators facing increasing policing demands and to enhance support for victims (Bossler *et al.*, 2020).

Financial crimes also need to be prioritized. All sectors of the police service have an important role to play in the success of an investigation. Police managers and central government also have a duty to maintain a supporting narrative that financial crime is important and will be resourced appropriately. It has been recognized that police resources dedicated to financial crime have struggled to compete with other crime priorities (Doig and Levi, 2013). However, through improved training, investigators will be able to better judge and, therefore, prioritize those cases that warrant further investigation. This article has identified the challenges in policing financial crime; however, building stronger working partnerships with the other important agencies involved in investigating financial crimes, will only assist the police in tackling the increasing threat of financial crime. It will also mean that the barriers facing officers in investigating and prosecuting such crimes, as highlighted in this article, will be easier to overcome.

Article overview

This article reports on research undertaken by the author, whilst serving within the police service, exploring the barriers facing practitioners in policing financial crimes. The study advances upon previous literature focused on the nature of this often misunderstood, under investigated, and under-detected field of policing.

References

- Alexandrou, A. and Davies, J. D. (2002). 'Partnership, Continuing Professional Development and the Police Service of England and Wales: Deconstructing the Myth and Raising the Phoenix from the Ashes'. *Journal of in-Service Education* 28(3): 447–458.
- Betts, M. J., Court, N., and Clark, D. (2017). *Investigation of Fraud and Economic Crime*. Oxford: Oxford University Press (Blackstone's Practical Policing).
- Bossler, A. M., Holt, T. J., Cross, C., and Burruss, G. W. (2020). 'Policing Fraud in England and Wales: Examining Constables' and Sergeants' Online Fraud Preparedness'. *Security Journal* 33(2): 311–328.
- Button, M., Blackburn, D., and Tunley, M. (2015a). 'The Not so Thin Blue Line after All?' Investigative Resources Dedicated to Fighting Fraud/Economic Crime in the United Kingdom'. *Policing: A Journal of Policy & Practice* 9(2): 129–142.
-

- Button, M. and Gee, J. (2013). *Countering Fraud for Competitive Advantage, the Professional Approach to Reducing the Last Great Hidden Cost*. Chichester: Wiley.
- Button, M., Gee, J., and Brooks, G. (2011). 'Measuring the Cost of Fraud: An Opportunity for the New Competitive Advantage'. *Journal of Financial Crime* 19(1): 65–75.
- Button, M., Shepherd, D., and Blackburn, D. (2018). 'The Iceberg beneath the Sea', *Fraudsters and Their Punishment through Non-Criminal Justice in the 'Fraud Justice Network' in England and Wales*. *International Journal of Law, Crime & Justice* 53: 56–66.
- Button, M., Wakefield, A., Brooks, G., Lewis, C., and Shepherd, D. (2015b). 'Confronting the "Fraud Bottleneck": Private Sanctions for Fraud and Their Implications for Justice'. *Journal of Criminological Research, Policy and Practice* 1(3): 159–174.
- Bullock, K. (2010). 'The Confiscation Investigation: Investigating the Financial Benefit Made from Crime'. *Policing: A Journal of Policy and Practice* 4(1): 7–14.
- Chave, D. (2017). 'Proceeds of Crime Training: Bringing It up to Date'. *Journal of Financial Crime* 24(3): 437–448.
- College of Policing. (2018). *Workforce Transformation in the Police Service: An Introduction*. <https://www.npcc.police.uk/Publication/Workforce%20Transformation%20Baseline.pdf> (accessed 28 April 2020).
- College of Policing. (2020). *Investigation: Investigating Fraud*. <https://www.app.college.police.uk/app-content/investigations/investigating-fraud> (accessed 27 June 2020).
- Crocker, R., Webb, S., Garner, S. et al. (2017). *The Impact of Organised Crime in Local Communities*. <https://perpetuityresearch.com/wp-content/uploads/2017/06/2017-05-Organised-Crime-in-Local-Communities-Final-Report-web.pdf> (accessed 27 June 2020).
- Doig, A. and Levi, M. (2013). 'A Case of Arrested Development? Delivering the UK National Fraud Strategy within Competing Policing Policy Priorities'. *Public Money & Management* 33(2): 145–152.
- Doig, A. (2018). 'Implementing National Policing Agendas and Strategies for Fraud at Local Level'. *Journal of Financial Crime* 25(4): 984–996.
- Fraud Advisory Panel. (2017). *On 8 February 2017 the Fraud Advisory Panel Wrote to the City of London Police (copying in the home office) About Policing Priorities for the Investigation of Fraud. Our letter is below*. <https://www.fraudadvisorypanel.org/wp-content/uploads/2017/03/Policing-Priorities-for-Fraud-Investigations-Final-Web-Copy-08Feb17.pdf> (accessed 26 June 2020).
- Frimpong, K. and Baker, P. (2007). 'Fighting Public Sector Fraud: The Growth of Professionalism in Counter-Fraud Investigators'. *Crime Prevention and Community Safety* 9(2): 130–137.
- Gottschalk, P. (2010). 'Categories of Financial Crime'. *Journal of Financial Crime* 17(4): 441–458.
- Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services. (2019). *Fraud: Time to Choose - an Inspection of the Police Response to Fraud*. <https://www.justiceinspectors.gov.uk/hmicfrs/publications/an-inspection-of-the-police-response-to-fraud> (accessed 28 April 2020).
- Honess, R. (2020). 'Mandatory Police Training: The Epitome of Dissatisfaction and Demotivation'. *Policing: A Journal of Policy and Practice* 14(1): 191–201.
- Jones, P. (2004). *Fraud and Corruption in Public Services, a Guide to Risk and Prevention*. Aldershot, England: Gower.
- King, J. and Doig, A. (2016). 'A Dedicated Place for Volume Fraud with the Current UK Economic Crime Agenda? The Greater Manchester Police Case Study'. *Journal of Financial Crime* 23(4): 902–914.
- Levi, M., Doig, A., Gundur, R., Wall, D., Williams, M. (2017). Cyberfraud and the Implications for Effective Risk-Based Responses: Themes from UK Research. *Crime Law and Social Change* 67: 77–96. <https://doi.org/10.1007/s10611-016-9648-0>
- Middleton, B., Antonopoulos, G. A., and Papanicolaou, G. (2019). 'The Financial Investigation of Human Trafficking in the UK: Legal and Practical Perspectives'. *The Journal of Criminal Law* 83(4): 284–293.
- Miller, M. (2018). *Understanding the Police Response to Fraud*. <https://perpetuityresearch.com/3131/understanding-the-police-response-to-fraud> (accessed 27 June 2020).
-

- Office for National Statistics. (2020). *Crime in England and Wales: Year ending December 2019*. <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingdecember2019#fraud> (accessed 9 May 2020).
- PwC. (2020). *Fraud and Economic Crime – an Evolving Challenge: PwC's Global Economic Crime and Fraud Survey*. <https://www.pwc.co.uk/services/forensic-services/insights/global-economic-crime-survey-2020.html> (accessed 29 August 2020).
- Semmens, N. (2011). 'Methodological Approaches to Criminological Research'. In Davies, P., Francis, P. and Jupp, V. (eds). *Doing Criminological Research*, 2nd edn. Thousand Oaks, CA: SAGE Publications, pp. 54–77.
- Shepherd, D. (2020). 'DIY: Fraud Investigation and Access to Justice: A Case Study'. *Policing: A Journal of Policy & Practice* 1–13.
- Skidmore, M., Ramm, J., Goldstraw-White, J. et al. (2018). *More than Just a Number: Improving the Police Response to Victims of Fraud*. <http://www.police-foundation.org.uk/publication/more-than-just-a-number-improving-the-police-response-to-victims-of-fraud> (accessed 28 April 2020).
- Skidmore, M., Goldstraw-White, J., and Gill, M. (2020). 'Understanding the Police Response to Fraud: The Challenges in Configuring a Response to a Low-Priority Crime on the Rise'. *Public Money & Management* 40(5): 369–379
- Sussex Police. (2020). *Operation Signature*. <https://www.sussex.police.uk/advice/advice-and-information/wsi/watch-schemes-initiatives/os/operation-signature> (accessed 27 June 2020).
- Vaismoradi, M., Turunen, H., and Bondas, T. (2013). 'Content Analysis and Thematic Analysis: Implications for Conducting a Qualitative Descriptive Study'. *Nursing and Health Sciences* 15(3): 398–405.
-