

Fraud Act 2006 and Digital Fraud Committee

Corrected oral evidence: Fraud Act 2006 and digital fraud

Thursday 16 June 2022

10.45 am

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Members present: Baroness Morgan of Cotes (The Chair); Lord Allan of Hallam; Baroness Bowles of Berkhamsted; Viscount Colville of Culross; Lord Gilbert of Panteg; Baroness Henig; Lord Sandhurst; Baroness Taylor of Bolton; Lord Vaux of Harrowden; Lord Young of Cookham.

Evidence Session No. 21

Heard in Public

Questions 222 - 230

Witness

I: Andy Cooke QPM DL, Chief Inspector of the Constabulary for the London and National Regions.

Examination of Witness

Andy Cooke.

The Chair: Welcome to this second evidence session this morning of the House of Lords Fraud Act 2006 and Digital Fraud Committee. A transcript will be taken and published on the committee's website, and you will have the opportunity to make corrections to that transcript where necessary.

We are delighted to be joined for our second session by Andy Cooke, who is Her Majesty's Chief Inspector of Constabulary and HM Chief Inspector of Fire and Rescue Services. That is quite a long title. Welcome and thank you very much.

Q222 **Baroness Henig:** Good morning. Congratulations, by the way, on that recent promotion.

Andy Cooke: Thank you very much indeed.

Baroness Henig: The inspectorate has repeatedly argued that fraud indefensibly continues to be treated as a low priority despite presenting a serious threat to civil society and public safety. Perhaps you could start by telling us why it has come to that conclusion.

Andy Cooke: I searched for those particular words in our previous reports and could not see them. I have no doubt at all that those words were used in a subsequent media interview. I agree with the comment that was made.

The financial implications of fraud on the UK economy, as we all know, are massive. The impact on victims, which was a point raised just before, is not just financial. There is very much an emotional impact on victims, many of whom are, sadly, vulnerable in relation to fraud. For many, it is life changing. In our previous reports, you will have seen a number of case studies that have spelled out the impact on the victims.

We cannot forget the amount of fraud offences either. It is the single biggest offence that is committed in this country. It was solely responsible, near enough, for the increase in last year's crime statistics, which showed that overall crime went up. We still have less than 1% of police personnel dedicated to it, for many good reasons. That is not a direct criticism of law enforcement and policing, because chief constables and PCCs need to consider many different priorities on a daily basis in relation to the threat and risk that is posed.

Issues for chiefs and PCCs sit around it. In fact, it is often complex. It is not a crime that is necessarily committed close by, so it can be cross-jurisdictional and cross-border. It causes significant problems in relation to resourcing.

It is fair to say that some positive changes have been made since our last report. We have done three reports recently—in 2017, 2019 and 2021. We did a spotlight report on how effective the 2019 report had been in relation to change. Since then, we have obviously seen the implementation of the National Economic Crime Centre and the national fraud policing strategy from NPCC. That greater co-ordination is certainly making a difference and we now have fraud as a higher priority, not right across the board but certainly in some forces.

Sadly, when scored on methods that police and law enforcement use to score crime, fraud does not tend to score very highly when you have firearms-enabled crime, knife-enabled violence and child sexual exploitation. That is a daily issue for police chief constables particularly to wrestle with. It is inarguable that the amount of resource put to fraud is too low.

Baroness Henig: Can I just press you on one area? The two police officers we heard evidence from in the first session were remarkably sanguine in some ways about resourcing and things improving. They were not complaining particularly about flaws in the system. They said that there were issues, but your take on this seems to be more

pessimistic, if I can put it that way, than what we heard in the earlier session. Do you share their optimism that things are improving?

Andy Cooke: Policing and law enforcement are eternally optimistic, and 36 years in law enforcement lead me to the conclusion that things are improving. Yes, the resourcing is better than it used to be, but it is not sufficient. The input from private industry is not sufficient. We had some examples there about online companies and the speedier banking approach. A lot more can be done not just by law enforcement, but by the whole system. That co-ordination is essential.

Q223 **Lord Young of Cookham:** The next question arises straight from Baroness Henig's. Looking at the strategic policing requirement, which is set by the Home Office and sets out the biggest national threats for the police, should fraud be included? Your office has some record of influencing the Home Office, in that violence against women and girls is now going to be included. Against the background of what you have just said about other forms of crime, should fraud be included in that SPR?

Andy Cooke: It is a really difficult question to answer. Let me explain why. In 2021, we commented that most of the people we spoke to as part of that inspection wanted it to be part of the strategic policing requirement, but they would do because they are directly involved in the investigation of fraud. The problem is that nothing becomes a priority if too much goes into the strategic policing requirement, because it is just a long list of things that have to be done by law enforcement. It is a real balance.

It should be kept in consideration for addition to the strategic policing requirement. There is a strong case for it to be included, but my view is that something else needs to come off if we include fraud, because, nationally, we cannot keep giving police chiefs too many priorities. As I say, nothing then becomes a priority.

Lord Young of Cookham: Was that a factor when it was recommended that violence against women and girls should be added? You could apply exactly the same argument to that inclusion as to fraud. It is a difficult question to answer, but would you put VAWG higher than fraud?

Andy Cooke: That is a really difficult question. Both have a significant impact upon large sections of the community. I can fully understand why violence against women and girls was included at that time. I would have no objection to fraud being included, but I just come back to the point that everything cannot be on the strategic policing requirement.

Lord Young of Cookham: You would not object, but you are not going to suggest it.

Andy Cooke: We did not recommend it in our last report, but we advocated for its consideration as part of the strategic policing requirement review. I was involved in that in my last role as a chief constable. I suppose the best way to describe it is as numerous leads for different parts of policing business who are all prosecuting for their own

piece of business to be part of the strategic policing requirements. The Home Office has to decide what is included.

The Chair: Mr Cooke, you have a very long and distinguished career in the police. In the last session, which you heard the second half of, we were exploring the structures and bodies that are responsible for investigating fraud. What would happen if fraud were added, and what is lost by it not being on the list?

Andy Cooke: I cannot remember anything ever coming off the strategic policing requirements, so it is addition on addition. If fraud is to be included in the strategic policing requirements, it has to come with something else, whether that is resource or law change, that raises its prioritisation as part of that. Just putting it on the SPR means that it will just sit among a number of other priorities.

The Chair: That is very helpful.

Q224 **Viscount Colville of Culross:** Good morning. In your *State of Policing* report, you said that the police have struggled, and continue to struggle, to keep up with the demands that the digital world places on them. How can the police recruit and retain the relevant digital skills against the severe competition they face from the private sector?

Andy Cooke: It is a real challenge for policing. We can add to that question as well that there is a national shortage of detectives at the moment, so getting the right people to be involved in targeting those engaged in fraud and online crime is a real challenge for chief constables. Policing is very grateful for the 20,000 uplift to numbers, but that will take many years to show real benefits, because there is a lot of inexperience in policing at the moment and the age level of many of the recruits is at the very lower end. It will be a continuous challenge over the next few years to keep the right people.

Policing and public service do not pay as much as the big companies. I can give a specific example of a young, very gifted detective chief superintendent, far too young in my view, who was whisked away by Amazon on treble the pay that he was on as a chief superintendent. To keep the good people involved, you need to look at the public service approach. You need to appeal to making a difference and do this for a good reason. We also need to look at interchangeability between private industry and public service, taking people with the right vetting and background for a couple of years into public service with the agreement of those companies.

Viscount Colville of Culross: We just heard about that happening from the previous set of interviewees.

Andy Cooke: I did not hear that, I am sorry.

Viscount Colville of Culross: We did, but it is obviously at a very nascent stage, hardly even happening at all. Should it be a priority to try to get that relationship going between the law enforcement agencies and

private industry in order to ensure that you can recruit and maintain the relevant digital skills?

Andy Cooke: It is always going to be difficult. As a public service, we should continue to appeal to the more benevolent side of big business in relation to it. We should keep asking questions and sharing our abilities. There are a lot of reasons why some of those companies will never do that; I accept that, but I am sure that some would. I am sure that, for some of those companies, it would also be good business to do so, because they would learn an awful lot about policing business, as policing would about how the companies work.

Lord Sandhurst: That is very interesting. You may not be able to answer this now, so perhaps you can reflect on it instead, but if you have some ideas, give them to us now. Can you think of any sticks or carrots that could be deployed by, say, the NCA to persuade people from Google and Amazon to come for a two-year secondment to work inside the NCA or Action Fraud? You would put in some contribution. They should possibly even supply them for free, because they have a vested interest in getting this sorted, or may have, because the regulators may put pressure on them. Can you try to think of that?

Andy Cooke: One reason for them to do it is that policing technology is big business that is worth billions of pounds a year, so there is a market opportunity for them in relation to that. To give a bit of fairness to the likes of Amazon, in my last role as chief constable, Amazon worked alongside my force for free, bringing in expertise on child sexual exploitation and better ways of dealing with sexual offenders.

There is a willingness there. There obviously has to be something in it for the business concerned. Solely appealing to its better nature is not always a great argument, so it has to be balanced with that. In relation to specific sticks and carrots, I will certainly give it some thought.

The Chair: I do not know whether you were in the room to hear this, but I think Deputy Superintendent O'Doherty said that digital investigation needs to be mainstream policing. I just wonder more broadly, given your role as chief inspector, whether the police are already, as we talked about, retraining as specials or using their digital skills. Outside fraud investigation and just generally, is more investment or support needed to retrain police officers in digital investigations?

Andy Cooke: The younger generation of police officers coming in now generally have a better understanding of this business, so that is a good start. An awful lot of good work has been done in relation to digitalising the daily life of police officers through hand-held devices. Most things can be done through a hand-held device.

Investment in technology on the side of policing and law enforcement—how much it costs—is always going to be an issue. The cliff edge funding approach for specialist units such as Action Fraud and regional organised crime units, where funding is promised only for the next 12 months, can

be a real barrier to investing in better technology. Policing is getting better at keeping up with digitisation and technology, but there is still a long way to go.

Q225 Lord Vaux of Harrowden: I was going to ask about Action Fraud and the National Fraud Intelligence Bureau. In 2019, the inspectorate did a review in which the report basically concluded that victims receive a poor service through a lack of both capacity and capability. You gave a number of recommendations and areas for improvement. To what extent have those recommendations and areas for improvement been acted upon and changed? What challenges remain, and what is the answer going forward?

Andy Cooke: The majority of those recommendations from 2019 have been completed, but there are a couple outstanding, and I will focus on those if I may. The recommendations were directed to the NPCC co-ordinator for economic crime, but they were for Action Fraud.

The first one was that Action Fraud should establish performance indicators for dealing with call waiting times. Obviously, this goes right to the heart of victims and how victims feel about being involved in the process. We recommended that clear detail should be published in relation to that, because at that time the average waiting time and the abandonment rate were far too high.

Some progress has been made in relation to it, but further work is needed. One of the key issues is that people do not know where to find that performance information anyway. As part of that 2019 inspection, we looked at how easy it was to go into a force's website and find out how it dealt with victims. We found 24 forces that had information on their websites; we found 14 of those reasonably easily, but the rest of them were really hard to find, even for people who had worked in law enforcement. We know where to look and the public would struggle to find it. The visibility of the performance indicators and their accuracy throughout the way fraud is dealt with nationally needs to be improved. That recommendation has partially been answered, but not fully.

The second one was in relation to updates of the NFIB intelligence database, known as "no fraud", which enables the NFIB to analyse and gather intelligence on this, and to improve the service that has been given. The City of London Police have known for some time that this "no fraud" is not fit for purpose and have tried to address that. A recent update in relation to the strategic analysis and intelligence platform side of it was implemented in 2018 and is still ongoing. At the end of the day, it is not fit for purpose. The City of London Police accept that it is not fit for purpose, so that recommendation has not been answered.

It will be challenging for the City of London Police to replace that with a better system, particularly against the backdrop that I mentioned before of the cliff edge funding, because the earliest they would be able to implement that system would be 2024 anyway. For the next few years,

we will have a system for intelligence on fraud that is just not fit for purpose.

Lord Vaux of Harrowden: That is interesting. I do not know whether you were here for the answers the witnesses gave on Action Fraud at the last session, but we heard about the changes that are going to be made to Action Fraud in 2024. Do you have any views on what they are planning there?

Andy Cooke: I would have to seek some advice on those, because I missed that part of the session.

Q226 **Lord Sandhurst:** Over the period of time, we have taken evidence from groups that the current counter-fraud policing response in England and Wales is not effectively co-ordinated. The Barber review, among other things, made two recommendations, which I shall highlight. One was the creation of a new crime prevention agency with fraud as a central priority. It suggested expanding and strengthening the NCA at the same time so that it acted like the FBI.

The second recommendation it adopted was that fraud investigations should be carried out by economic crime specialists based in regional units tackling fraud across regional boundaries and so on, presumably working with and under the NCA or the new crime prevention agency. Do you have views about that?

Andy Cooke: In our 2019 report, we said that the current model of local investigations supported by national functions was right. We considered a national approach as part of that, but our view was that it was not viable.

If I deal with the first part of your question first, the Barber review undoubtedly came up with some very good ideas around policing. Quite a centralist approach was adopted for quite a few of those ideas as well. I do, however, agree with the regional economic crime investigators in regional organised crime units. Being the inspectorate, whether that should happen is not my decision to make, but I am very clear that the link between the regional and national forces needs to be very strong. There is still more work to do on making sure that regional organised crime units are consistent with each other and that the links are there internationally, nationally and locally.

A key issue now is not just whether there should be a central or local agency, but the ability to task against fraud issues nationally. The NCA has tasking powers in relation to serious organised fraud and other crimes that it can task regions and forces to deal with. In 2019, we gave the recommendation that more work should be done on that ability to task. However, the National Economic Crime Centre was put in place in the intervening period, so we changed that recommendation in the 2021 report to recommend that the NECC and others should ensure that tasking on fraud is better than it was.

Some progress has been made by the City of London Police and other partners to the NECC in that intervening period, but it is still not where it

needs to be. We still have organised fraud bouncing around between different agencies because no one is prepared to pick it up. That tasking ability is really important. We were asked to consider writing off that recommendation in March this year and we declined to do so, because more work needs to be done on that ability to task and co-ordinate the key fraud inquiries that are ongoing.

Lord Sandhurst: In very simple terms, what would your structure be?

Andy Cooke: If it were my decision—

Lord Sandhurst: You are Home Secretary or God tomorrow.

The Chair: They are not necessarily equivalent.

Andy Cooke: I am not sure who has the hardest job out of the two. If it were in my ability, I would have the three different tiers. If you move it away from a local approach, you can lose some of that care and compassion to victims and some of the local knowledge that is required. If you just have a central agency, that is just another agency among many that are involved in law enforcement and similar issues. I would go for a strong central tasking model sitting in the National Crime Agency that was fully linked into regional economic crime investigators as well as investigators involved in economic crime locally, who would give that local touch for those investigations.

Lord Sandhurst: They would have to have resources and skills.

Andy Cooke: Yes. They would need to be correctly trained. As I mentioned, at the moment, there is a real issue about training and identifying detectives.

Lord Sandhurst: Are there any operational models, either in the UK or overseas, that may be doing it better than we do?

Andy Cooke: I tasked my staff to have a look at this quite recently and they could not find one. That is not to say one is not there. I am not sure whether that is a measure of international law enforcement or my staff; we will have to see.

Q227 **Baroness Bowles of Berkhamsted:** Lord Sandhurst touched on the word “resources”, and there is always a price tag to that. How much additional funding is needed to ensure that the various remedies discussed in response to the questions asked today can be enacted and sustained into the future? What conversations on the topic of resourcing have been held with the Home Office and others in Government?

Andy Cooke: This is a really difficult question for me to answer, because the inspectorate does not get involved in negotiation in relation to costing recommendations or similar matters. That is a matter for the Home Office, the NPCC and various others. I am trying not to be rude in answering this question, but I really cannot answer it, because we have never been involved in those sorts of discussions. I would go back to the

fact that it is quite apparent that insufficient resource is placed in the investigation of fraud at the moment, but I would really struggle to specify the amount.

Baroness Bowles of Berkhamsted: When speaking to the Treasury Committee in the Commons, the then-director-general of the NECC told them that they had asked the Government for an additional £80 million to fund law enforcement activity. The spending review in 2021 suggested that they were going to get only £42 million for economic crime; that is just 1% of the £4.2 billion increase to the Home Office budget over the next three years. You may not be able to answer in quantitative terms, but in qualitative terms does 1% of the budget increase sound right to you, given the extent of fraud?

Andy Cooke: It is undeniable that insufficient resource is put into the investigation of fraud, for the reason I mentioned of chief constables having to make decisions about where those priorities go. You could probably times the £80 million by five and you would start to make a small dent in relation to the scale of the problem. It is one of those issues for which money has to be spent wisely, and law enforcement needs to ensure that the money it has is being spent wisely. An awful lot of money can be poured into it, but it is about making sure that where the money is coming from is balanced against other priorities for law enforcement. I am sure that the head of the NECC will ask for £160 million and not £80 million next time; he might get £80 million then.

Baroness Bowles of Berkhamsted: There are other ways to get money. In the context of money laundering, there is going to be a levy. That will raise £100 million, but that is available on the money laundering side and nothing to do with the fraud side. Can you think of mechanisms with which money could be raised out of the detection of fraud and hypothecated back into it?

Andy Cooke: I suppose the eternal questions are these: "Is private industry putting enough money into the prevention of fraud? Should it fund more the approach that policing action takes"? There is also a question of where that money should go. Should it go into investigation or prevention? If that many offences are being committed, the first question is where you get your best bang for your buck. In relation to fraud, a lot of that will be prevention. By the time you get to investigation, it is too late for a lot of people who have suffered from it. There are a number of questions around it, but it is really difficult for me to put a figure on how much.

Baroness Bowles of Berkhamsted: Yes, I understand. "Go for the cause" is quite a useful comment, but we have to know that people are caught. They then move on.

The Chair: Mr Cooke, I should probably know this. Do you report to the Home Secretary or Parliament?

Andy Cooke: I report into the Home Affairs Committee. I am responsible to them and obviously responsible to the public. The Home Secretary commissions me, but she cannot tell me what to say—any Home Secretary, that is, not just this one.

The Chair: I am pleased to hear it. I was just thinking of the use of your report in terms of Baroness Bowles' question about resourcing. It has come up in lots of evidence sessions as to whether a Select Committee will look at what you are saying about particular areas and use that as a reason to push the Home Office on resourcing, or whether, if you know from conversations you have once your report has been published, Home Office officials are also looking and thinking, "He's mentioned this and done a specific report on it, so we'd better give this a bit more money and attention". Do you ever have follow-up conversations like that?

Andy Cooke: They are not specifically about money. The annual *State of Policing* report sets out the key challenges for policing and is directed towards the Home Secretary. From that, I am sure that policymakers identify where policing is struggling more than other places or where it needs more resources, as long as that *State of Policing* report is a good report. I know that the Home Office is doing an awful lot of work on fraud at the moment. It has a new fraud strategy coming out. It is not like fraud is the forgotten part of policing. It is a key part of it, but it sits among other priorities.

The Chair: Has that changed over the years? Perhaps one could argue that it was forgotten at one point, because, as somebody said in written evidence, it does not bang, bleed or shout. Therefore, it has often been perceived in the past as a bit of a victimless crime. It was partly also because other parts of the private sector will just pay compensation.

Andy Cooke: I think so. I am pleased to remember that that is a line from one of our reports.

The Chair: We have taken note, you see.

Andy Cooke: Good. When you consider the explosion of fraud over the last 10 years or so, "caught me by surprise" is probably the wrong way of putting it, but the scale of it becomes a real challenge. It had become a poor relation in law enforcement to a great extent. I used to have a very small fraud department. Policing can no longer do that. Policing is looking right across the cyber-enabled and fraud picture. Resources have not really caught up with the scale of the issue so far.

Q228 **Lord Allan of Hallam:** One area where people can spend their resources is on fraud awareness campaigns. A lot of people have proudly brought their campaigns to us, including one of the previous set of witnesses, who has a sort of old-school postcard that they send out to people. We noted that the inspectorate has argued that too little is done to assess the effectiveness of these campaigns, so we are curious to hear your view on how useful fraud awareness campaigns are and what might be done to improve their effectiveness.

Andy Cooke: It is an excellent question. I saw that in the last session. I think there are some excellent fraud campaigns out there. I say "I think", because there is an insufficient evaluation of the campaigns that go on with the public to see if they make any difference. Bearing in mind how much public money has been spent on them, we should have a better evaluation system for what works.

It is no good measuring against how many times it is shown on social media or as an advert on television, or how many forces take up the campaign. The real point of evidence evaluation for me is whether it changed behaviour. We have consistently seen a lack of evaluation of prevention campaigns; we have raised this issue previously. We have never judged the individual campaign itself on big concerns. If you are going to spend public money on campaigns, you have to evaluate the effectiveness. That is not the number of tweets; that is speaking personally to victims or potential victims. Did they see it? Did it change their behaviour? That is how we are able to tell whether it is effective.

Lord Allan of Hallam: I certainly agree with you. Commercial advertisers are ruthless in understanding whether people bought the product, not whether they saw the ad.

I am curious. You have said this repeatedly. What happens next if they continue to ignore you and do not spend any money on doing the surveys?

Andy Cooke: The inspectorate is an inspectorate; we are not a regulator for good reason, because chief constables are operationally independent. You cannot have a central body telling the chief constable, "You must do this". We make recommendations. The vast majority of the time, whether that is a thematic report or part of our peer inspections that just look at each force, those are dealt with because it is not in a chief constable's interest not to do anything about those recommendations.

This is one where we need to continuously put the pressure on to get good evaluation and get the College of Policing involved in that evaluation as well, so that best practice and learning can come from what has been done previously.

Lord Allan of Hallam: I guess airing the question in a parliamentary hearing is another way to get some focus on that lack of evaluation.

Q229 **Baroness Taylor of Bolton:** You mentioned at the beginning that victims were very important and that this did not just have a financial impact but often an emotional one. You have just been talking about evaluation of the campaigns. How would you evaluate how victims are treated? Obviously, the scale of the problem is very great now. We heard earlier from the police and crime commissioner that the landscape is very confusing; he said there is a black hole for many victims. Would you like to comment on that?

Andy Cooke: Policing and law enforcement's response has improved, but there is still a long way to go in relation to victims of fraud particularly.

That starts with forces being clear with victims as to what they can expect from the local force in relation to the fraud offence that has happened to them. It is fair to say that forces in general are better at identifying vulnerable victims of fraud now than previously and that they are better at communicating with vulnerable victims of fraud. In general, fraud victims are not given enough information, even down to the fact of whether that fraud against them will be investigated.

Fraud presents some real challenges, particularly around the victims' code. If you have multiple victims, it can be a lot harder to comply with the victims' code, but the policy drawn up by NPCC now gives an exemption for how you can better speak to victims, identify victims and keep them informed of progress.

I mentioned how easy it was for victims and members of the public to find out from the websites how they would be treated if a fraud was committed against them. That was not where it should be, and I would urge forces to improve in relation to that. We have also heard about the long waiting times for victims with Action Fraud, and the number of calls that are terminated and abandoned before they speak to anyone because of the delays that we have seen.

Although there has been improvement, it is fair to say that victims of fraud can disappear into a bit of a black hole. I mentioned that trying to get someone to investigate offences of fraud can be difficult, given individual forces' priorities. A lot more needs to be done. There needs to be a lot better compliance with the victims' code.

One of the key things is keeping people informed. As a victim—and I will say this a previous victim of crime—you can accept that it does not get solved, but you cannot accept the fact that you are not kept informed of the progress or otherwise in relation to it. There is more work to do, but it has certainly improved since our 2019 inspection.

Baroness Taylor of Bolton: You mentioned vulnerable victims there, as others have. They are often portrayed as the elderly, people who are at home and are phoned, and so on. In fact, the majority of victims are younger people who are vulnerable in a different way through being enticed into being money mules or whatever. Do we do enough to alert younger people to their vulnerability?

Andy Cooke: Rob Jones previously mentioned the work that is done in academic institutions. I have seen for myself some very good work going on there to raise the profile on younger people.

This is a sweeping generalisation, but a lot of younger people are more blasé about this not happening and that is part of being involved with social media and being online. Most of the real impacts have been seen against older people or more vulnerable people in relation to mental health issues, et cetera. Those impacts can be absolutely dreadful. We know about people who have committed suicide or attempted suicide, or who have refused to go out of the house, following this.

It is a balance, really. Where do you get the best bang for your buck? Forces are right to focus on the most visibly vulnerable people who are subject to this, but they cannot forget younger people who fall victim to this far more often than is reported to law enforcement. No doubt a vast amount of this crime is not reported to law enforcement.

Baroness Taylor of Bolton: In terms of getting best bang for a buck, is part of the issue that all those involved have to concentrate on high-value targets and crimes so that the lower end of what the fraud amount has been tends to be pushed to one side, and that is why those victims tend to feel in that black hole?

Andy Cooke: Yes, absolutely. With the scale of the millions and millions of fraud offences every year, it would be impossible for law enforcement to deal with each of those offences in any meaningful way. The higher value gets looked at, but the caveat should be either higher value or impact on the victim. That can be £100 for some people, so we cannot just look at it in monetary or value terms. It is about the impact of this crime on that individual. That goes for every crime and not just fraud.

Q230 **The Chair:** Thank you very indeed, Mr Cooke. We are very grateful for your evidence this morning, your time and everything else. We have come to the end of our specific detailed questions. I do not know whether there is anything else that you particularly wanted to raise with this committee. As Lord Allan said, taking advantage of being able to raise things in front of parliamentary Select Committees can be useful, but is there also one specific recommendation related to what you have reported on that you would like us as a committee to include in our report?

Andy Cooke: The first point I will make before I come to a specific issue is that it cannot be forgotten that there is a sea of fraud happening. Law enforcement has done some exceptionally good work with the resources that it has, and there are some real pockets of excellent work ongoing across the country. That cannot be forgotten in relation to how the policing and law enforcement personnel are addressing these solutions.

I mentioned before, and Sir Craig Mackey mentioned in his report, that there is a real mismatch between the level of resources and the level of the problem. That needs to be a consistent theme and thought for government and law enforcement.

I was going to mention an issue that has been mentioned anyway, which is the cliff edge funding. If you want real progress in relation to tackling fraud, there should be 12 month on 12 month funding in order to build technology to do it and secure the better people involved. I mentioned the people going into private industry from the public sector. If you know that the funding for your role is not clear in 12 months' time, where is the incentive to remain where you are when you can be better paid elsewhere?

The other one I want to mention is duty to prevent.

The Chair: That is, the failure to prevent offence.

Andy Cooke: Yes, absolutely.

The Chair: Would that be seminal in changing behaviours and concentrating minds?

Andy Cooke: I think so. Because of the scale of fraud, prevention is crucial. You will never reduce numbers just by enforcing single issues around it. There has to be that duty and power to prevent. That is a really powerful tool.

The Chair: Just on the cliff edge funding, given your experience in the police more broadly, are there any other areas in which the approach to cliff edge funding has been changed with effect? Is that something that has worked and changed elsewhere?

Andy Cooke: It is a similar issue to funding for regional organised crime units, which has previously been year on year. In relation to the last review that I was involved with in policing, there was a three-year promise that that funding would remain. Even three years is not long enough, in my view. Issues like fraud are not going to go away; they will be here for some time. There needs to be a five-year or 10-year commitment: "We're going to continue funding this at least for this amount for this long".

The Chair: We talked in the previous session about having a 10-year fraud strategy. In your experience, would you therefore say that, in order to really land a 10-year strategy, it needs 10-year funding?

Andy Cooke: It would certainly give people a very clear view about the ongoing commitment of Government and others to addressing the problem and the importance of the problem. For instance, you cannot fund fraud for three years and then say that it is not a priority any more because times are tight. It has to remain a priority in relation to the amount of people who are suffering from it.

The Chair: Thank you very much indeed for your time this morning. I know that preparing for Select Committees takes some time, but we are really grateful to you for the evidence that you have given this morning. Thank you very much.