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Dear Susan,

I am writing to you in your capacity as Chairman of the London Assembly's Police and Crime Committee. Having represented the MPS at the meeting, alongside Det. Superintendent John Roch and DI Geoff Donoghue, I am writing in reply to the letter from Caroline Russell AM, former Chair of the Police and Crime Committee, dated 27 February 2024.

I note Caroline's letter includes several recommendations. For ease, I have set out our response to each recommendation in the Annex enclosed.

Please accept my apologies for the delay to this reply. As a result of the London Assembly elections in May and restructuring within some MPS teams since then, it has taken us longer than we would have liked to come back to you. However, as you will see, we have been extremely active in this space since I attended the Committee back in January 2024 and I am pleased to share a number of significant updates with you and your colleagues.

Yours sincerely,

Commander Stephen Clayman

Central Specialist Crime,
Metropolitan Police Service.

Annex

The Committee recommends that the Met uses its communication channels and community engagement structures to warn Londoners about the threat, range and risks of financial scamming, including money laundering.

The Economic Crime Command does request for relevant posts to be shared on both the MPS' main communications channels and also local channels. (Each ward and borough in the MPS area have access to their own communications channels on X (formerly Twitter), which are used to raise awareness of local issues.)

All requests made by the Economic Crime Command for wider MPS support of Action Fraud and other campaigns will be carefully considered against other requests.

As you will appreciate, the MPS communications team are asked to publicise a range of issues. All decisions will be dependent on wider media interest, operational needs and community concerns.

The Committee is deeply concerned at the vast quantities of illicit finance (£12 billion cash and £100 billion through the financial system each year) being laundered through the UK. It recognises the steps taken by the Met and its partners yet remains concerned that seizures of cash are in tens of millions and not the billions being laundered.

The Committee recognises the complexity of money laundering, the challenge in detecting and preventing it and welcomes the commitment from all agencies to work together to tackle it.

The MPS is one of several UK agencies who are engaged in the fight against money laundering. We also recognise the importance of collaboration as part of the effort to recover criminal assets.

The Economic Crime Command is the principle department within the MPS for investigating money laundering, using the powers set out in the Proceeds of Crime Act.

The MPS allocates resource to countering money laundering and recovering criminal assets using a Placement, Layering and Integration model. The table below provides further detail on this model.

Money Laundering Stage	MPS Resource
Placement	MPS ECC Proactive Teams – Cash seizure
	ECC FI's – Cash seizure
Layering	ECC FI's – Account Freezing Orders (AFOs)
	ECC Proactive SARS Unit – AFO's
	MPS Forensic accountants
	ECC FI's – Cryptocurrency powers under ECCT
Integration	ECC FI's – Listed assets
	ECC FI's – Confiscation
	ECC FI's RART – Civil recovery
	ECC FI's ACE Team – Confiscation revisits

Please note, the Economic Crime Command is currently undergoing a restructure, which is expected to result in the separation of the fraud investigations and criminal finance/money laundering investigations functions.

We are currently reviewing opportunities for greater collaboration with the City of London Police and National Crime Agency to ensure we are prioritising the investigations presenting the greatest risk to communities, improving intelligence pipelines, reducing duplicity and delivering the most impact.

As part of this review, we are exploring how we can use secondments to both the City of London Police and the National Crime Agency to facilitate closer working.

It may also be of interest to you to know the Dedicated Card and Payment Crime Unit (DCPCU) is a pre-existing joint MPS/City of London Police team. This team is funded by the banking industry and its sole purpose is combatting crimes associated with banking and payments.

The DCPCU's objectives are to proactively pursue fraudsters who cause the most economic harm; disrupt Organised Crime Groups, opportunistic fraudsters and online threats; and use the media to help partners develop their counter-fraud capabilities.

The MPS has hosted workshops with the City of London Police and National Crime Agency around closer working. We are currently examining how we can align our resourcing across pro-activity, victim care, protect activity, complex investigations, fraud investigation teams and criminal finance teams

The Committee is concerned by the vacancy rates in the Met's Economic Crime Command. It recommends that the Met conducts a review urgently examining the composition of its Economic Crime Command to:

- **Identify vacancies that require filling as a priority; and**
- **Ensure that it has the right skillset and ratio of police staff and police officers.**

As part of the ongoing restructuring to the Economic Crime Command, we can confirm we are looking to recruit a number of additional civilian financial investigators. This uplift will enable the Economic Crime Command to have a presence on the frontline as the intention is to locate the

additional investigators in Borough Command Unit (BCU) buildings, have them assist with cash seizures and have them share their skills and experiences with frontline officers.

The recruitment process to deliver the uplift is underway. We are confident once delivered, this uplift will increase our ability to seize more assets and investigate money laundering offences more effectively.

The recruitment of additional civilian financial investigators also aligns with our wider objective to civilianise roles which do not require warranted officers.

At a broader level, we do hope to recruit an additional number of civilian financial investigators as part of an effort to enhance the Economic Crime Command's overall capacity to seize assets with a view to reinvesting back into the MPS, creating a self-sustaining funding model. This proposal is due to be taken to the MPS Executive Committee in due course.

The Committee recommends that the Met works closely with the City of London Police and the National Crime Agency to identify opportunities, including secondments and apprenticeships, to work with the private sector to strengthen the Met's response to money laundering, upskill officers and staff and ensure it has the right skills to respond.

Please see the reply above regarding collaboration with the City of London Police and the National Crime Agency.

The Committee welcomes the work the City of London Police is leading to increase understanding of money laundering across frontline officers. The Committee recommends that the Met reviews the training provided to its frontline officers to identify any gaps and ensure all officers understand what money laundering is and what powers are available to assist them on the frontline.

The MPS is continually working to upskill our officers and staff on emerging issues.

The City of London Police has created an Economic Crime App which has been rolled-out across the MPS to provide frontline officers with greater guidance on money laundering and economic crime.

In addition to the launch of the Economic Crime App, our team host in-person and virtual training sessions. Our Central Specialist Crime team also provide 'Lunch and Learn' sessions on a range of relevant topics to keep officers and staff across the Economic Crime Command upskilled in new areas, such as cash handling.

A core function of our crypto-team (see below) is to deliver relevant upskilling and to operate as a centre of excellence, providing both internal and external training.

Further, the additional civilian financial investigators being recruited will work with local teams, enabling them to recognise and act when they come across illicit finance.

The Committee recommends that the Met works with the Mayor, the Home Office and NECC to increase its pro-active engagement with universities across London to raise awareness of the threat posed by money laundering and that students might be susceptible to becoming money mules.

The MPS fully recognises the importance of pro-active engagement. You may be interested to know the MPS Economic Crime Team does operate a university engagement programme. Engagement events are arranged either in the format of presentations or stalls to upskill young people on financial exploitation.

As part of Student Money Week 2024, our team worked with the National Association of Student Money Advisors to create partner packs for universities to use to educate their students on financial exploitation and fraud types affecting young people.

Further information is available here: [NSMW 24 - Metropolitan Police – For National Student Money Week and Beyond - NASMA](#).

Please note, the MPS is seeking to move away from the use of the term ‘money mule’.

The Committee welcomes the Economic Crime and Corporate Transparency Act and the anticipated impact it will have on money laundering activity. The Committee recommends that the Met provides it with further detail on what powers it will use, how these will strengthen its approach and the resource implications arising from this new legislation by June 2024.

The Economic Crime and Corporate Transparency Act empowers officers to seize, detain and forfeit crypto-assets, disrupting and denying criminals access to these assets.

Using the powers conferred under this Act, we are pleased to share the MPS is working towards the formation of a multi-agency crypto fusion cell which will seek to forge better collaboration between agencies to recover more crypto-assets. Partner agencies include the City of London Police, the National Crime Agency, the Financial Conduct Authority and HMRC.

The Committee believes it is imperative the Met upskills its staff in new areas (such as cryptocurrency), working closely alongside financial institutions, to match the growing demand tech-enabled money laundering poses on the service.

In addition to the ongoing training the MPS provides to officers and staff, which includes a clear focus on upskilling, the MPS is a key partner to, and majority resource provider for, the Economic Crime Plan (ECP) 2. The plan recognises the emergence of crypto-assets within large-scale cash-based money laundering.

The plan also calls for the creation of a multi-agency cell to share intelligence and working practices to develop an effective response to this threat.