

BUSINESS CRIME STRATEGY

2014-2016



MAYOR OF LONDON

OFFICE FOR POLICING AND CRIME

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CONTENTS

Forewords	4
Strategic context: The case for change	8
Lack of business confidence in the policing response to reported crime	10
Cyber-fraud is an area of increasing vulnerability for businesses big and small, and the police response has not been good enough	13
Under-exploited opportunities for collaboration between police and businesses	17
Lack of take up of effective protective security and prevention advice	22
Delivery plan	26
Objectives	27
MOPAC's three immediate developments to aid the response	28
MOPAC's three key longer-term innovations	30
MOPAC's challenge to law enforcement partners	32
MOPAC's key asks of businesses to help law enforcement partners in the response	34
Performance framework	36
Using the ACPO definition for business crime	38
Better understanding how much business crime is organised crime committed by gangs	38
Mapping of police resources to business crime hot spots	39
Publishing clearer data for fraud committed against London's businesses	39
Introducing the first ever Business Attitudes Survey	39
Governance	40
MOPAC Business Crime Change Board	41
Annexes	42

FOREWORDS

STEPHEN GREENHALGH

Deputy Mayor for Policing and Crime

London drives our nation's economy. The city contributes over 22% of the UK's total output and employs over 5.4 million people. But safety is crucial to this position as the country's economic hub and one of the largest business centres on earth.

Local prosperity, too, is driven by a feeling of safety. So by improving our response to crimes that impact on small businesses, we can generate prosperity in those areas that are hit by crime.

Across the capital crime is falling like a stone – down 17% under this Mayor – and our streets are getting safer. But crime against businesses remains significantly under-reported and the police response when reports are made is too often inadequate. Unless and until reporting increases and the response improves we won't be able to deal with all the forms this threat takes.

If London is to continue to grow and thrive as both the greatest and safest global city on earth, then it must provide the safest environment for enterprise as well as the citizen. Therefore, we need a renewed effort to both fight crime that affects big and small business and stop it from happening in the first place.

This is the first strategy of its kind and **it represents a call to arms for the police, businesses, local authorities and others to work together to build confidence and prevent and cut crime.** But more than this, it sets out clear, deliverable plans to achieve this, with commitments from MOPAC and law enforcement and expectations on businesses.

The crime threat in the UK is changing as criminals become more sophisticated and more crime, and opportunity for crime, moves online. This strategy, along with the MPS's firm commitment to build their capability, the City of London Police's desire to improve their performance and the NCA's zeal for the fight, mean that we can take that challenge head on.



SIR BERNARD HOGAN-HOWE

Commissioner, Metropolitan Police Service

Our job is to make London a safe place in which to live, visit or invest. As part of that drive over the past 18 months the Metropolitan Police Service has launched a renewed focus on business crime. We are proud that London will be the first in the country to have a business crime strategy which unites partners within law enforcement, criminal justice and the business community in the fight against crime.

Vibrant, prosperous and well managed businesses are the lifeblood of the City and we want them to operate free from the fear of crime, anti-social behaviour and in a well-policed cyberspace.



The MPS recognises the huge contribution the private sector, Business Improvement Districts and the broad range of local business partnerships can give to support the police and we want this partnership to be strong, effective and ingrained in our organisational culture.

We are enhancing our capability to fight crime online through the launch of the FALCON (Fraud And Linked Crime ONline) command, we have invested in developing business crime reduction partnerships across the city with the Safer London Business Partnership and, using expertise from the business community, have the first UK dedicated business crime hub collating best practice and sharing information and intelligence across industry.

We welcome the publication of the first business crime strategy by MOPAC as an opportunity to galvanise activity, reduce crime and put criminals on the back foot as we take the total war on crime to them.

DONALD TOON

Director, Economic Crime Command, National Crime Agency

The National Crime Agency (NCA) welcomes the opportunity to work with MOPAC on its Business Crime Strategy.

We know that serious and organised criminals target business for many reasons, including defrauding them for financial gain. Small and medium-sized enterprises in London are not able easily to absorb the impact of fraud against them and can cease trading. Attacks on online services erode consumer confidence, which affects social and economic wellbeing and reduces the attractiveness of the UK, including London, as a place to do business. In addition the scale of the laundering of criminal proceeds, despite the UK's leading role in developing international standards to tackle it, is a strategic threat to the UK's economy and reputation.

The NCA firmly believes that MOPAC's Business Crime Strategy is the right way forward to tackling business crime in the capital. We recognise that it is in the private sector that much of the threat of serious and organised crime is felt, and that it has data

and capabilities that can make a real contribution to the response. We recognise that law enforcement cannot tackle serious and organised crime on its own and want to strengthen our collaborative activity with business. For this reason I welcome the Mayor's three key asks of businesses to help law enforcement.

We know there will be challenges ahead and we need to ensure that law enforcement activity does not add unnecessary additional bureaucracy or processes to business activities. However, through partnerships such as this, we can work together to help safeguard London's reputation as a safe and prosperous business environment.



STEPHEN HEAD

Commander and National Police Coordinator for Economic Crime, City of London Police

In our role as the National Lead Police Force for fraud we have welcomed the opportunity of working with MOPAC on this new Business Crime Strategy.

The threat from fraud and particularly from cyber enabled fraud continues to grow and every section of society is now at risk. It is therefore increasingly important that policing and businesses work ever more closely together to counter this threat. The collaborative and joined up approach advocated by MOPAC and highlighted in this strategy is absolutely the right approach if we are to be successful in continuing to meet this challenge.

Fraud and business crime impact upon small and large businesses alike and the scale of the threat ranges from the most serious and organised criminal networks through to larger numbers of more isolated incidents. This strategy supports a clear and proactive approach to protecting the citizens and the businesses of London from every aspect of that threat and builds upon work undertaken over the last two years to change the way policing and government deal with fraud and cyber-crime as a whole. The development of new and emerging technologies has necessitated a far reaching modification of all our policing practices and this strategy is a key component of that fight in London.

We will continue to work with MOPAC and others to ensure that our capital city remains one of the safest and most business-friendly anywhere in the world with a policing approach that is fit and appropriate to tackle 21st century crimes.



STRATEGIC CONTEXT: THE CASE FOR CHANGE

The Mayor's vision is for London **"to be the safest and greatest big city on earth"**. This includes helping London to be the safest city in the world in which to do business.

This strategy starts with the principle that businesses that are well-informed and resilient against crime, and are supported by excellent law enforcement, will help the city and nation thrive. London's economy is integral to the prosperity of the UK.

London collects £5.4 billion of business rates each year – a tax take 15 times larger than that of the UK's second city. The income generated by the city's businesses ensures funding for public services across not only London but the entire country.

The aim of this strategy is radically to improve the landscape for business by boosting law enforcement's ability to pursue criminals, and the ability of businesses to protect their physical and intellectual property. The ambitions of this strategy – ranging from setting up England's first Business Crime Resilience Centre for police and private sector, driving up investment in law enforcement capability, ensuring a policing response aimed at crime hot spots and working in unprecedented partnership with business – will give London the platform for ever greater growth, prosperity and confidence.

During the consultation for this strategy, the Mayor's Office for Policing And Crime (MOPAC) took evidence from nearly sixty organisations from individual businesses, trade bodies, charities, local authorities, cyber security experts and Government departments (see a full list in the appendix).

Stakeholders relayed to us a number of core issues:

- A** There is a lack of business confidence in the policing response to reported crime.
- B** Cyber-fraud is an area of increasing vulnerability for businesses big and small, and the police response has not been good enough.
- C** There are opportunities for greater collaboration between police and businesses.
- D** There is a lack of take up of effective protective security and prevention advice.

A

LACK OF BUSINESS CONFIDENCE IN THE POLICING RESPONSE TO REPORTED CRIME

Many businesses who responded to the consultation on this strategy stated that crime goes unreported as they are not confident of an effective police response. Retailers, in particular, often choose to solve crimes themselves or take no further action. This is backed up by the 2013 British Retail Consortium (BRC) survey which found that a third of respondents indicated that the most significant reason preventing them from reporting crime was because they had no confidence in the police response, a large increase on the previous year.

It is significant that 2013 has the lowest reporting rate for customer theft since the BRC survey began over ten years ago. This is also reflected in the MPS's own crime figures, where reported business crime has decreased in every year since it started to be measured consistently in 2011/12.

MOPAC has heard from businesses and the police that crime is being committed more and more by organised criminals. Without the full intelligence picture through consistent reporting by business, the police cannot link offences perpetrated by organised crime gangs, which makes it harder to prosecute them.

This lack of confidence is also borne out in the figures. In 2013/14, businesses were victims of over 100,000 crimes, which was 14% of all recorded crime in the MPS. The most common types of crime suffered by businesses were theft and handling, criminal damage, burglary, robbery and violence against the person. This is shown in table 1 opposite.

The level of recorded crime has fallen each year since the 2011/12 base year when London's first Police and Crime Plan was published.¹ That strategy set the MPS a target to reduce key crime types by 20% by 2016. However, this was aimed at crimes against the individual.

Business crime is slightly different from crime against the individual as it is currently under-reported. An increase in recorded cases of business crime may actually indicate an increase in business confidence in the police to deal with offenders. MOPAC wants the trend of decreasing crime reports to be reversed.

The data for individual offence types (table 2) shows a similar pattern of decreasing volumes. By far the highest offence type is theft and handling, representing over 70% of all business crime in 2013/14.

1. <https://www.london.gov.uk/priorities/policing-crime/mission-priorities/police-and-crime-plan>

TABLE 1: MPS RECORDED BUSINESS CRIME 2011-2014

BUSINESS CRIME OFFENCE TYPE	2011/12	2012/13	2013/14	CHANGE 2011-2014	
Theft and Handling	76,612	75,658	72,756	-3,856	-5%
Criminal Damage	19,212	16,122	14,970	-4,242	-22%
Burglary	14,683	12,406	11,377	-3,306	-23%
Violence Against the Person	2,348	2,248	2,496	148	6%
Robbery	2,144	1,841	1,463	-681	-32%
TOTAL	114,999	108,275	103,062	-11,937	-10%

TABLE 2: MPS BUSINESS CRIME DETECTION RATES 2011-2014

BUSINESS CRIME OFFENCE TYPE	2011/12 %	2012/13 %	2013/14 %	CHANGE 2011-2014 %
Theft and Handling	29	26	27	-2
Criminal Damage	19	21	23	4
Burglary	16	15	19	3
Violence Against the Person	52	51	54	2
Robbery	30	25	30	0
TOTAL	29	28	30	1

Source: MPS CRIS System

*NB excludes fraud as this is largely reported through CIFAS (see p.15)

The outcome rates for business crime from 2011/12 – 2013/14 show that the numbers of business crimes being solved is broadly flat in percentage terms, with 2013/14 being the highest performing year.

This also shows that police performance in solving business crime is actually better than crimes against the individual; the detection rate for MOPAC seven crime types against the individual was 14% for 2013/14.²

However, to increase confidence the police still need to clear up more business crime, and businesses need to help the police by reporting more. In areas where crime is reported more consistently, for example in Business Crime Reduction Partnerships, it becomes easier for the police to link together repeat offenders as they have the whole crime picture.

The High Street Blues report by the Greater London Assembly³ stated that smaller convenience stores and similar businesses are particularly vulnerable to business crime such as theft and assaults in high streets.³ Respondents were not happy with the current level of police response.

In this strategy, MOPAC challenges business to dare to share intelligence and crime reports more openly with law enforcement so crime gangs and serial perpetrators can be traced. MOPAC wants to see an increase in reporting business crime, and similarly an increase in the number of business crimes solved as a result.

MOPAC will also introduce the first ever Business Attitudes Survey so that there is another more robust indicator of business confidence than recorded crime statistics.

2. MOPAC 7 SD performance, 2013/14

3. High Street Blues, Conservative Group, Greater London Assembly, 25 February 2014

B

CYBER-FRAUD IS AN AREA OF INCREASING VULNERABILITY FOR BUSINESSES BIG AND SMALL, AND THE POLICE RESPONSE HAS NOT BEEN GOOD ENOUGH

Fraud and cyber-crime are significant and growing problems across all sectors of society, including business. No method of measuring fraud is reliable, but all estimates demonstrate a problem of significant scale. The National Fraud Authority estimates that in 2013 the loss to the UK economy through fraud was £52 billion.⁴

The British Retail Consortium estimate that fraud accounted for 41% of the total cost of crime to retailers in 2012-13. The majority of retailers also reported that cyber-attacks posed a critical threat to their business.⁵

The internet has made it easier to commit fraud, and one estimate suggests that 57% of fraud reported in 2012/13 was cyber-enabled.

Numerous law enforcement bodies are involved in tackling fraud.

The Government, business and law enforcement are structuring themselves to tackle this new type of threat, but the landscape can sometimes appear confusing.

City of London Police is the lead force in England and Wales for the fight against fraud. Since April 2013, Action Fraud has received all reports of fraud and computer misuse offences from the public and businesses on behalf of police forces. These are screened for opportunities to investigate and also used in prevention and disruption.

The **National Fraud Intelligence Bureau (NFIB)** within the City of London Police analyses crime reports and refers actionable crime report packages for local borough police within the MPS to investigate and solve.

The MPS then investigate frauds received from the NFIB at a borough-level.

Expert capability at a national level is available to the MPS. The **National Cyber Crime Unit (NCCU)**, part of the National Crime Agency) was set up to lead on cyber-crime in the UK under the Serious and Organised Crime Strategy, receiving skilled resources from the MPS. The role of the NCCU is to identify and prosecute people engaged in cyber-attacks in the UK, and also support investigations into cyber-enabled crimes, providing technical support to police forces where necessary.⁶

This fragmented law enforcement landscape needs one body to oversee a more effective response.

4. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/206552/nfa-annual-fraud-indicator-2013.pdf

5. http://www.brc.org.uk/brc_policy_content.asp?iCat=48&iSubCat=646&spolicy=Retail+Crime&sSubPolicy=BRC+Retail+Crime+Survey

6. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/248645/Serious_and_Organised_Crime_Strategy.pdf

Under this strategy MOPAC will establish a Business Crime Change Board and a statistical toolkit – a business crime performance framework – that will shine a spotlight on the performance of each organisation responsible for improving the response to online fraud.

The local response to fraud is currently inadequate – an astonishingly small proportion of fraud cases are actually solved by the police in London.

Fraud is currently reported into City of London Police through three main pathways – Action Fraud, CIFAS, and the UK Payments Council.

In 2013/14 Action Fraud received 391,642 reports (approximately 9% of which were from business). The National Fraud Intelligence Bureau assessed only 2,700 reports, or less than 0.6%, as viable for investigation.

Approximately 1,980 were sent to the MPS, where an estimated 360 resulted in a successful police / judicial outcome.

However, reports of fraud from businesses via CIFAS shows clearly the current issue with attrition rates for fraud.

Of 81,631 crimes occurring within the Greater London area reported by UK businesses to the National Fraud Intelligence Bureau via CIFAS in the 2013/14 financial year, fewer than 1% were sent on to the MPS for action (see diagram opposite), and only nine packages of linked fraud offences saw successful police or judicial outcomes.⁷

This data, backed up by what stakeholders told MOPAC during the strategy consultation, shows that current reporting, intelligence and enforcement mechanisms for fraud need drastic improvement.

7. Data obtained by MOPAC from CIFAS, 2013

There is poor victim response to fraud.

In consulting for this strategy MOPAC heard the views of businesses dissatisfied with the current police response to fraud.⁸

MOPAC also heard from the key trade bodies which represent small businesses.

It is particularly worrying how little redress there is for a small business brought to its knees by online or supplier fraud. To date, it has not been a priority for victims reporting crime to Action Fraud to be updated on progress or advised on the realistic likelihood of an offender being charged.

Police recognise that contact with victims needs to improve. Consequently, a new Economic Crime Victim Care Unit is to be set up by the City of London Police to provide greater support and protection to individuals and businesses targeted by fraudsters.

The MPS has delivered significant crime reduction in recent years, but acknowledges that performance in respect of business crime and cyber-enabled fraud has lagged behind. The MPS recognises it needs to build its specialist capability against fraud, to increase take up of training and to have in place plans to assess and respond to the threat.

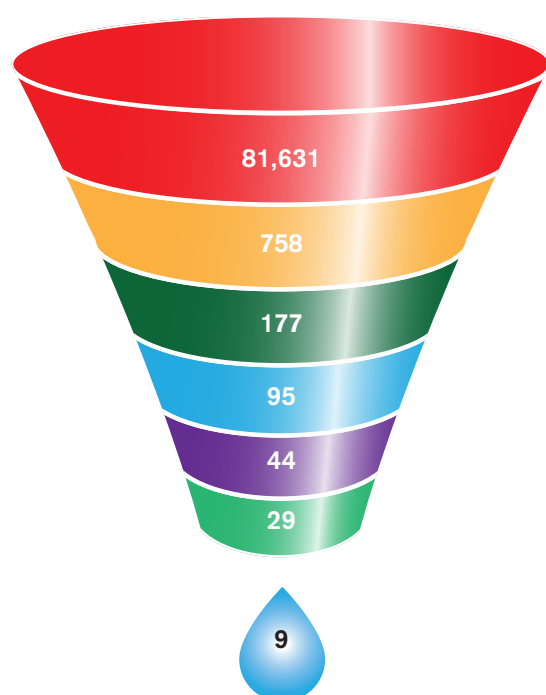


TABLE 3: THE 'FRAUD FUNNEL'

81,631	Frauds reported by London-based businesses in 2013/14
758	Fraud reports deemed solvable by NFIB at City of London Police
177	Onward referrals of 'packages' linked to fraud cases to MPS
95	Packages currently under investigation by MPS
44	Packages where no further action was taken by MPS
29	Packages investigated by MPS but closed

Successful Police/Judicial Outcome – just 9 fraud packages in 2013/14

8. Fraud Advisory Panel, Federation of Small Businesses, CIFAS

As Her Majesty's Inspectorate of Constabulary (HMIC) noted, national police leaders have started to take steps to improve the skills of their staff to deal with cyber threats. Take up of training provided by the College of Policing has been poor.⁹

The MPS has plans to build a significant new capability, the FALCON command, which will lead on cyber-crime and fraud in particular.

MOPAC will work with the MPS to ensure FALCON is successfully implemented to improve outcomes and the victim response.

There is evidence to suggest that businesses are willing to invest in more police capacity to address fraud or to join up intelligence.

MOPAC heard from businesses throughout the consultation that they would be prepared to fund police officers, as is already done in business improvement districts. However, the lack of prioritisation being given to pursuing offences of cyber-fraud does not make a compelling case for businesses investing time and money into the bulk reporting tools without a re-focused strategy.

Some businesses are able to compile crime reports to a high evidential standard, but find there is a lack of dedicated resource to action arrests from the police.

The consultation underpinning this strategy has indicated that the opportunities for better collaboration between the business sector and law enforcement are not being fully exploited.

MOPAC will ensure that opportunities for police and industry collaboration are fully exploited.

9. The Strategic Policing Requirement: An inspection of the arrangements that police forces have in place to meet the strategic policing requirement, HMIC, 10 April 2014



UNDER-EXPLOITED OPPORTUNITIES FOR COLLABORATION BETWEEN POLICE AND BUSINESSES

MOPAC has heard examples of how better joint work between business and the police can vastly improve the effectiveness of the response to business. These include:

- Business Crime Reduction Partnerships as a forum for better police-business engagement
- Working with the late-night trade
- Working with planners on designing areas that minimise crime
- Policing operations being targeted at crime hot spots



BUSINESS CRIME REDUCTION PARTNERSHIPS AS A FORUM FOR BETTER POLICE-BUSINESS ENGAGEMENT

As with fraud, when businesses on the high street report crime and share intelligence with each other and with the police, they do not always do so in a systematic manner. Good quality evidence and CCTV images, reported in fast time and in a compliant manner, are crucial tools in bearing down on criminals in our town centres.

Some information sharing relationships between the police and businesses are more mature than others. Consistent information sharing, using standard agreements and information platforms, should become the norm. Information should be uploaded to an evidential standard, which will give the police the tools they need to use their specialist powers.

Real gains are being made in areas where there are active Business Crime Reduction Partnerships, for example in areas of Soho and Lambeth. Intelligence on suspected offenders is shared between businesses, and along with radios, shop keepers can remain vigilant of possible threats. They also provide a one-stop shop for police to engage with the wider business community, making best use of time and resources.

As intelligence and crime reports are collated by a manager, a better crime picture emerges and this can help the police catch both prolific shoplifters and gangs who target shops in a systematic way.

Working with local authorities and the MPS, MOPAC will facilitate setting up BCRPs in current business crime hot spots.

MOPAC also calls on business to help the police with minimum standards for CCTV and other forms of evidence so criminals can be convicted, and also give the public reassurance that town centres are safe places to shop and enjoy a night out.

WORKING WITH THE LATE-NIGHT TRADE

Bars, pubs, restaurants and other businesses which operate at night create wealth, jobs and regeneration opportunities in town centres; but unchecked, they can also cause disorder that impacts on local residents and visitors to London.

When police and licensees work closely together, crime can be minimised through good prevention advice and responsible management of licensing conditions. However, MOPAC heard during the consultation from the late night trade and from the police that not all parts of London consistently follow best practice.

There needs to be a more consistent and standard approach to licensing across the MPS.

There also needs to be a better set of indicators to ensure that the police know where there might be problem premises. This needs to be reviewed more openly with the trade it affects to ensure all steps are taken before enforcement action is pursued.

MOPAC will address issues of crimes committed against the late-night trade by working with the MPS through a sub-group of the Business Crime Change Board.



WORKING WITH PLANNERS ON DESIGNING AREAS THAT MINIMISE CRIME

MOPAC heard during the consultation for this strategy how better relationships formed earlier in the design of new shopping centres can ensure crime is designed-out at the outset.

Designing-out crime has already shown great success in reducing crime in other areas.

For example, under Operation Vanguard in which the MPS worked with industry to develop new intelligence, prevention and enforcement methods the number of cash in transit robberies of security vehicles has fallen. The MPS also provides training for retailers and assists boroughs where robbery has become an issue.

There are opportunities to identify best practice and promote good security in shopping centres and high streets. This has the additional benefit of reducing the cost and inconvenience of having to 'target-harden' premises after they have been built.

The MPS has a specialist team of Design-Out Crime Officers (DOCOs). If business engages them at the right stage of developments, crime prevention advice and relevant standards such as Secured by Design can be implemented.

Business can play its part in designing-out crime in town centres. Under this strategy MOPAC will ensure the MPS' specialised DOCOs are fully engaged by business at the right point in the development process.



THERE IS GOOD PRACTICE IN HOW POLICING OPERATIONS CAN BE TARGETED AT CRIME HOT SPOTS, BUT THIS IS NOT CONSISTENTLY APPLIED.

MOPAC has heard from retailers in central London how police resources could be better allocated by demand. In some hot spots there is a very effective police response, but it is not always applied year-round.

The MPS carry out an annual Operation Blizzard in the West End over the Christmas and New Year period targeting crime and anti-social behaviour. Tactics include focused local deployment, daily briefings, crime prevention advice, community reassurance and high profile publicity which were used to reduce crime and to support the local business community. Working in partnership with local businesses, Operation Blizzard has reduced anti-social behaviour and made the West End a more welcoming and attractive location for visitors and the local community.

Based on the good work in Westminster, similar operations are starting to run in other high footfall areas, such as Operation Holles in the Southbank.

MOPAC wants this model to be more consistently applied around the year. Research carried out by the MPS in 2014 shows the top ten areas in London where businesses were victims. MOPAC also wants these hot spots to form pilot areas for better demand modelling and aligning resources to business crime hot spots.

Under this strategy MOPAC will ensure the MPS begins to target its resources more consistently in ten business crime hot spots. MOPAC will also drive the MPS to make better use of predictive crime mapping tools, already being successfully used in burglary campaigns.



D

LACK OF TAKE UP OF PROTECTIVE SECURITY AND PREVENTION ADVICE

MOPAC's consultation and research showed that smaller organisations are particularly vulnerable to business crime, with fewer resources to dedicate to security, both in terms of infrastructure and reporting. This is particularly acute in terms of cyber security, where small businesses are vulnerable.

The 2014 PwC Information Security Breaches survey showed that fewer small businesses reported security breaches than in the previous year (33% in 2014, down from 43% in 2013), but that the average cost per breach had gone up by nearly double from on average £35k-£65k per breach, to on average £65k – £115k per breach. This type of attack can completely wipe out a small enterprise.¹⁰

Oxford Economics recently predicted that over the next decade, London's digital technology sector could grow by 5.1% a year, creating an additional £12 billion (\$20 billion) of economic activity and 46,000 new jobs by 2024. Many of these businesses are small, innovative start-ups. It is therefore critical to London's economy that these organisations take up advice and know what to do in the event of a cyber-attack.

In 2011, the Federation of Small Businesses highlighted how smaller businesses could do more to protect themselves and prevent fraud and cyber-crime happening in the first place, but that Police forces and Police and Crime Commissioners should do more to help them, including better signposting of advice and expectation management.¹¹

There is therefore a general agreement that awareness raising is key. However SMEs are sometimes harder to reach as they do not have the resources of larger organisations to manage affairs with Government stakeholders. Cyber-awareness and support needs to be scalable and accessible for busy individuals running small businesses.

There is a plethora of guidance available to smaller businesses, but more should be done to make it more accessible and relevant.

Work conducted by the Federation of Small Businesses reported that businesses would welcome a more effective police response to fraud and more targeted advice and effective signposting around cyber-crime and fraud.¹¹

This is not to say this information is very useful, but it can be time consuming for people running smaller enterprises to navigate.

10. <http://www.pwc.co.uk/audit-assurance/publications/2014-information-security-breaches-survey.jhtml>

11. http://www.fsb.org.uk/frontpage/assets/fsb_cyber_security_and%20_fraud_paper_2013.pdf

Current initiatives include:

The Government's national Cyber Street campaign, funded by the National Cyber Security Programme, which aims to provide an online portal for advice to small businesses and the public about online protection.¹²

The Fraud Advisory Panel (FAP) provides 'fraud facts' and guidance for both small businesses and the public, particularly with financial redress for those defrauded where the police response has not been effective.¹³

The MPS produce a Little Book of Big Scams for Business to help them manage the threats.¹⁴

An industry-led cyber security standard has recently been launched by Government to help address basic technical risks to organisations, of any size. This will help smaller organisations to understand how to attain different levels of cyber-security, giving assurances to industry that cyber risks are being minimised when awarding contracts.¹⁵

E-learning training is also being developed for SMEs on information security, adapted from the public sector 'Responsible for Information' training. This should be ready in 2014 and will be available free of charge.

The Cross-sector Safety and Security Communications platform (CSSC) is an alert system set up for the 2012 Olympic Games. It was set up as a not for profit organisation. Information alerts are managed through a central hub, which maintains permanent direct contact with the police, other agencies and the 'Industry Sector Leaders' from trade bodies and major individual businesses.¹⁶ This allows businesses real-time information about anything from major incidents to threats of cyber-crime.

Innovation vouchers are a possible route for London SMEs to access funding to help them improve their cyber security. Up to £5,000 is available per organisation to those applying through the Government's Technology Strategy Board.¹⁷

There are a number of organisations that are trying to support small and medium sized businesses. However, there is a lack of evidence that guidance and good practice on information security management actually influences smaller businesses protecting themselves online. This field is constantly evolving to keep ahead of the criminal threat, and smaller businesses need help to keep up with all of these developments.

MOPAC needs to take the lead and translate this confusing picture into actionable advice for smaller businesses.

12. <https://www.cyberstreetwise.com/>

13. https://www.fraudadvisorypanel.org/publications.php?c_id=19

14. http://www.met.police.uk/docs/little_book_big_scams_business_edition.pdf

15. <https://www.gov.uk/government/publications/cyber-essentials-scheme-overview>

16. <http://www.vocal.co.uk/cssc/>

17. <https://vouchers.innovateuk.org/home>

There is work being done in the public sector, in Scotland and elsewhere which should be replicated in London to help small businesses

The work of the Scottish Business Resilience Centre has been very successful in providing a central focal point for providing advice, support and information sharing across businesses and the police. The key aim of the Centre is to protect jobs and growth in Scotland by addressing the diverse needs of all businesses, from one person start-ups to multinationals investing in Scotland.

The Centre does this through a wide programme of activities, and has a strong core of programmes aimed at both better joint working with law enforcement through secondments and targeting problems effectively, and ensuring business is effective at better protecting itself to begin with to reduce demand on policing. The Centre also manages messaging alerts through a shared resource – CSSC Scotland.

For example, the Centre co-ordinates the development of business networks and information sharing tools, uses experts to test the cyber-security of Scottish businesses, uses performance oversight, research and analysis to target problem areas, and runs awareness campaigns to influence how businesses can better protect themselves.

Given the new threat of cyber-crime, more creative ways of addressing the skills challenges in local law enforcement should

be found, working with experts in industry. The Centre does this through secondments described above.

It is really important to have specialists who have expertise in financial investigations and cyber security working with the police. Good practice already exists. MOPAC commends schemes such as that run by City of London Police's Special Constabulary, which use industry specific special constables to help combat business crime, shows the sort of creative work that is needed to combat the lesser understood threat of internet enabled crime. A Centre could co-ordinate industry secondments and academic students into the police in London.

MOPAC wants this model replicated in London, scalable for SMEs who most need our help.

Under this strategy, MOPAC will introduce a Business Crime Resilience Centre of its own, but focusing on helping smaller businesses to make it much simpler to protect their assets using crime prevention advice, business-to-business alerts, and cyber security standards.

This can form the starting point or proof of concept for a national hub supporting the Government's Serious and Organised Crime Strategy.⁵

The Centre will offer five key things for SMEs:

- **Present best practice, guidance and threat assessments in one place**
- **Provide alerts to business via the Cyber Information Sharing Partnership**
- **Provide a mechanism and resource for industry secondments and academic students into the police service**
- **Manage a programme of roadshows to raise awareness of threats to businesses, especially for SMEs**
- **Provide a service to assess the level of cyber resilience in a business, for example by the Government's recently launched Cyber Essentials Scheme**

National cyber security protection

Nationally, there are mechanisms to support forces developing response plans with larger businesses to an orchestrated cyber-attack. The National Cyber Security Programme, funded as part of the Cyber Security Strategy, has two important developments.

The **Cyber Information Sharing Partnership (CiSP)** enables members to engage with industry and government peers in a secure environment and obtain early warning of potential cyber threats. CiSP has a joint industry and government 'Fusion Cell' analytical team which collates information from many sources, joining the dots and alerting members to potential breaches and threats.

The **UK Computer Emergency Response Team (CERT-UK)** will work on developing the UK's cyber resilience to state-sponsored and criminal attacks on critical systems. Billions of pounds are lost to the UK economy each year with industry being by far the biggest victim.

There is a need for greater awareness by business, including SMEs, of how to respond to organised cyber threats when they occur and this need extends to the police. A recent HMIC inspection found that the MPS was amongst the large majority of forces not to have developed cyber-crime strategies or plans.

It recommended that forces should understand better their role in preparing for and tackling the threat of a large scale cyber incident, using the "Pursue, Prevent, Protect, Prepare" themes⁸ that are central to the national Serious and Organised Crime Strategy published by the Government earlier this year.

DELIVERY PLAN

What MOPAC wants to achieve through this strategy to address the problems outlined above

**IN ADDRESSING THESE CORE BUSINESS CRIME ISSUES,
THE FOLLOWING OBJECTIVES WILL BE ACHIEVED:**

PURSUE

Prosecuting and
disrupting more crime
against business

PREPARE

Reducing the impact
of crime against
business

PROTECT

Increasing the protection
for business against
becoming a victim of crime

PREVENT

Preventing individuals from
being drawn into carrying
out crime against business

MOPAC WILL IMPLEMENT THREE IMMEDIATE DEVELOPMENTS TO AID THE RESPONSE:

1. MOPAC will introduce a Business Crime Change Board, and the Mayor of London will chair an annual 'Business Crime Summit' to track delivery.

The Deputy Commissioner currently leads on business crime for the Metropolitan Police Service and the Strategic Business Crime Forum has been very successful in promoting openness between businesses and senior police officers around key issues.

This forum will be further developed into the key reference group supporting the delivery of the strategy, chaired by the Deputy Mayor and meeting quarterly, with an annual 'Business Crime Summit' chaired by the Mayor of London. Building on the successful work of the London Crime Reduction Board, this will be called the **MOPAC Business Crime Change Board**.

Membership will be reviewed, to include key representation from across the business community, law enforcement and other sectors.

There will also be sub-groups that will drive tactical and operational delivery of this strategy – these will be focused on:

- o Day-time economy
- o Night-time economy
- o Cyber-crime.

2. MOPAC will roll out further Business Crime Reduction Partnerships using the top ten Recorded Business Crime hot spots.

MOPAC and the MPS's research on business crime has shown that there is a web of anti-crime agencies working in town centres, and this can lead to confused responsibilities, task duplication, and poor co-ordination of limited police resources.

BCRPs can help here by acting as focal points of contact for the police and business community, and lead key activities such as:

- Radio schemes for businesses to alert one another to threats;
- Information sharing portals to share data on known offenders, and also report crime to the police without duplication;
- Better co-ordination of work with private security so there is no duplication and police make best use of their special powers.

Current BCRP provision around London is patchy. MOPAC will work with the MPS, using data on business crime hot spots, to offer support in setting up BCRPs in areas with most demand. This will be co-ordinated using the Safer London Partnership umbrella model, which already has success in rolling out BCRPs in other London boroughs with high levels of business crime.

3. MOPAC will facilitate the use of Predictive Crime Mapping tool to assess emerging business crime hot spots.

Predictive crime mapping has been used by the MPS since 2013, where automated data analysis is combined with proactive policing. In January 2013, the MPS began a trial of predictive mapping in order to reduce residential burglary.

The approach showed promise and a predictive crime mapping pilot has now been rolled out to all boroughs and the process is being extended to a wider range of crimes that are known to be a priority for the public including all the 'MOPAC 7' crime types.

Once there has been an evaluation of the robustness of the predictive process, MOPAC will ensure the MPS expand its use further for predicting spikes in business crime.

MOPAC WILL OVERSEE THREE KEY LONGER-TERM INNOVATIONS:

1. Establish London's first Business Crime Resilience Centre

MOPAC will establish, working alongside key partners, a Business Crime Resilience Centre similar to the Scotland model to co-ordinate information and resource sharing across business and law enforcement, and to in particular protect and increase threat awareness of small start-ups and SMEs.

This can form the starting point or proof of concept for a national hub supporting the Government's Serious and Organised Crime Strategy.⁶

The Centre will do five key things:

- Present best practice, guidance and threat assessments in one place
- Provide alerts to business via the Cyber Information Sharing Partnership
- Provide a mechanism and resource for industry secondments and academic students into the police service
- Manage a programme of roadshows to raise awareness of threats to businesses, especially for SMEs
- Provide a service to assess a business' level cyber resilience, for example by the Government's recently launched Cyber Essentials Scheme.

2. Ensure clearer performance management of agencies responsible for a better business crime response

MOPAC will be joining the Home Office Serious and Organised Crime Board to ensure there is clear accountability in every area of business crime from the local to national level.

MOPAC will also develop the first ever Business Crime Performance Framework for London, including:

- Using the Association of Chief Police Officers (ACPO) definition for business crime to look at reporting levels and outcomes
- Better understanding how much business crime is organised crime committed by gangs
- Mapping of police resources to business crime hot spots
- Publishing clearer data for fraud, showing numbers of viable National Fraud Intelligence Bureau fraud packages sent to the MPS by the NFIB, and the numbers of outcomes for bulk fraud
- Introducing the first ever Business Attitudes Survey.

3. Drive a step change improvement in the reach of advice to small business

The National Crime Agency is assisting MOPAC and partners to develop a consolidated source of advice for business. MOPAC will work with the NCA to ensure that significant amount of guidance for SMEs online reaches its intended audience and that there is further support available.

This activity will be co-ordinated under the new Business Crime Resilience Centre.

**MOPAC WILL CHALLENGE LAW ENFORCEMENT
PARTNERS TO DELIVER THREE KEY IMPROVEMENTS:**

**1. A measurable improvement
in the response to online fraud**

MOPAC, working with CIFAS, will ensure that clear data showing the scale of the problem, the number of reported frauds, attrition rates, onward referrals to the MPS and finally outcomes for victims will be shared between City of London Police, NCA, Home Office and MOPAC so there is much greater transparency and ownership of the problem among agencies.

**2. An increase in resources in
the MPS policing response to
fraud through collaboration,
co-funding and partnership
with business**

The MPS is substantially increasing its capability to deal with fraud and cyber-enabled fraud through the creation of a new command of hundreds of specially trained officers.

This will be set up from July 2015 and will aim to substantially increase the number of fraud detections, currently extremely low as CIFAS data shows, and provide a much better service in terms of victim care.

MOPAC will work with industry partners and the MPS to ensure opportunities for collaboration are fully exploited.

3. A local policing response with police activity targeted at crime hot spots

MOPAC wants to ensure that efforts to match resources to times of peak demand, as seen successfully in operations such as Operation Blizzard in the West End over Christmas, are not limited to just one period in the calendar year.

As part the business crime performance framework in this strategy, MOPAC will work with the MPS to develop a tool that looks at how police resources are matched to demand across busy periods, to reassure businesses that the police are in the right places at the right times. This will be done using the top ten business crime hot spots.

**MOPAC HAS THREE KEY ASKS OF BUSINESSES TO
HELP LAW ENFORCEMENT PARTNERS IN THE RESPONSE:**

**1. To design-out crime at
the beginning of new
developments**

MOPAC heard during the consultation that crimes could be prevented by a more consistent uptake of advice earlier in new developments.

MOPAC now asks businesses to form better relationships with the MPS DOCOs, so money isn't spent on target-hardening.

**2. To help police with a new set
of minimum standards for both
evidence and public safety**

This will be two projects. The first is a safety kite mark pilot, to which retailers will sign up, reassuring the public and police that they have done all they can to prevent crime.

The second project aims to improve the working relationship between police and the private security industry.

This will roll out schemes to improve the working relationships in three pilot areas:

- In retail security, by improving quality and training of security staff, improving the intelligence flow between police and private security and encouraging joint patrolling where appropriate
- In CCTV control rooms, by improving the briefing of control room staff, improving the feedback mechanisms to CCTV control rooms and improving tasking of staff
- In the night time economy, by improving the intelligence flow between police and private security, briefing and tasking staff and by encouraging joint patrolling where appropriate

3. To dare to share more openly with the police

This cuts right to the heart of this strategy. The police can only form links to tackle the more organised forms of retail and online crime so harmful to the economy if businesses report much more.

In return MOPAC wants the police to give assurances to business that more of these crimes will be solved. Initiatives such as the London Business Crime Resilience Centre and Business Crime Reduction Partnerships will provide the framework for this relationship.

PERFORMANCE FRAMEWORK

How MOPAC will measure the success of this strategy

Through this strategy MOPAC will ensure clearer performance management of the various agencies who are responsible for the business crime response. MOPAC plans to do this by establishing of the first ever business crime performance framework for London, including:

- 1. Using the ACPO definition for business crime to look at reporting levels and outcomes**
- 2. Better understanding how much business crime is organised crime committed by gangs**
- 3. Mapping of police resources to business crime hot spots**
- 4. Publishing clearer data for fraud, showing numbers of viable NFIB fraud packages sent to the MPS by the NFIB, and the numbers of outcomes for bulk fraud**
- 5. Introducing the first ever Business Attitudes Survey.**

Because business crime is under-reported, MOPAC is not setting numerical targets for volume changes in recorded crime in this strategy. Rather, MOPAC wants to see recording increase, as the confidence of businesses in the police response improves.

1. Using the ACPO definition for business crime to look at hot spots, reporting levels and outcomes

Business crime is such a loose concept that ACPO has recently published a definition for business crime to try to pin it down and target problems.

‘ any criminal offence that is committed against a person or property that is associated by the connection of that person or property to a business’.

This broadly means that business crime is any offence against a business, or against business’ customers which could result in a loss of trade. This may be simplified to crimes against, in or around businesses.

Every quarter MOPAC will publish a set of business crime indicators using MPS recorded crime structured under this definition.

This will allow MOPAC and the MPS to assess crimes where businesses were the direct victim, but also crimes committed in a business premise that may affect their trade or reputation.

Alongside an increase in crime reporting by businesses, MOPAC also wants to see an increase in sanction detection rates for all offences.

2. Establishing a better understanding of how much business crime is organised crime committed by gangs

A big benefit of good information sharing between businesses and the police is that the complete picture of criminality is known.

For example, this has allowed existing BCRP's to understand much more about crime committed by repeat offenders or organised by gangs. This allows the police to focus their resources on repeat offenders, rather than opportunistic crimes that occur in places of high footfall.

MOPAC will work with the MPS, retailers and existing / emerging BCRPs to gain a much better understanding of how much business crime has a more serious and organised nature, which would allow police resources to be directed to best effect.

3. Mapping of police resources to business crime hot spots

MOPAC will work with the MPS to assess the resources allocated to each of the ten business crime hot spots across times of the day. This will allow MOPAC to challenge how well police resources are allocated to business crime hot spots, and whether the model needs to be refined to better match demand in high footfall areas. This will also reassure businesses in crime hot spots that police resources are effectively allocated.

4. Publishing clearer data for fraud committed against London's businesses

MOPAC will be publishing every quarter-year a summary of data from City of London Police and CIFAS, which will give an indication of both reporting levels, attrition rates and outcomes for victims of fraud. As shown, the current outcome rate for MPS fraud cases is very low. MOPAC wants to see this outcome rate increase by 2017.

MOPAC will specifically look at:

1. How many reports of fraud the NFIB receive from business
2. How many packages of linked crimes are created and referred onwards to the MPS
3. How many result in a positive outcome once at the MPS.

5. Introducing the first ever Business Attitudes Survey

Confidence between the police and business goes right to the heart of the issue MOPAC is trying to address through this strategy. While increases in reporting may be a proxy for confidence, having a clear, robust measure of business confidence will allow us to assess improvement and supplement data above.

MOPAC will create a completely new – and first – survey of business confidence in the police. This will be called the London Business Attitudes Survey.

The survey will need to be managed by experienced market researchers, and this needs a robust method of sampling and interviewing businesses across London.

The survey will therefore take time to implement, and MOPAC will publish the first results by April 2015.

GOVERNANCE

The MOPAC Business Crime Change Board

The Deputy Commissioner currently leads on business crime for the Metropolitan Police Service. The MPS Strategic Business Crime Forum has been very successful in promoting openness between businesses and senior police officers around key issues.

This forum will now be further developed into the key reference group supporting the delivery of the strategy, chaired by the Deputy Mayor and meeting quarterly, with an annual 'Business Crime Summit' chaired by the Mayor of London. It will be called the 'Business Crime Change Board'.

Membership will be reviewed, to include key representation from across the business community and different sectors. This will include the MPS, City of London Police, NCA, London First, the London Chamber of Commerce and Industry, the British Retail Consortium and the federation of Small Businesses.

There will also be sub-groups that will drive tactical and operational delivery of this strategy – these will be focussed on:

- Day-time economy
- Night-time economy
- Cyber-crime.

ANNEX A

[About this document](#)

In the Police and Crime Plan 2013-2016, the Mayor committed to establishing a business crime strategy for London.

MOPAC has now carried out extensive consultation with businesses across London, and assessed feedback on the draft proposals presented to the police and business community in November 2013. MOPAC now presents this final strategy as a way of rebuilding trust and confidence between businesses and the police.

This strategy has been endorsed by a number of key partners as well as the MPS, in recognition of the growing threat of cyber-crime to London's businesses and the need for a coherent law enforcement response. This includes the City of London Police and the National Crime Agency.

The research for this strategy included:

- A review of evidence base including Home Office research, British Retail Consortium survey, and the Home Office Commercial Victimisation Survey.
- Four specific MOPAC stakeholder workshops themed around shopping centres and retail crime, the night time economy and Business Crime Reduction Partnerships and Business Improvement Districts. This informed the initial strategy document that went out for consultation from 26 November 2013 – 7 February 2014.
- Analysis of formal feedback to the draft strategy (over 60 submissions, see annex B).
- Two cyber-crime breakfast seminars with police, banks, insurance companies and cyber security companies.
- One cyber-crime roundtable event focused on the threat to business from intellectual property crime with police, law firms and cyber-security companies.
- Engagement with colleagues including business, Government and academia.
- Conferences such as the annual British Retail Consortium loss prevention conference and briefings for police and crime commissioners on cyber fraud.
- Business crime leadership events for police and business to strengthen working relations.

ANNEX B

List of respondents to draft proposals

NAME	TYPE OF ORGANISATION
ACPO Business Crime Lead - DCC Sue Fish	Law Enforcement
AM Roger Evans	Assembly Member
Angel AIM BID	Business Improvement District
Association of Business Crime Partnerships	Trade body
Association of Convenience Stores	Trade body
Association of Licenced Multiple Retailers	Trade body
Baker Street Quarter BID	Business Improvement District
Better Bankside	Business Improvement District
British Bankers' Association	Trade body
British Council of Shopping Centres	Trade body
British Oil Security Syndicates Limited	Trade body
British Retail Consortium	Trade body
Camden Town BID	Business Improvement District
Centre for Strategic Cyberspace and Security Design	Not for profit association
CIFAS	Not for profit association
City of London Police	Law Enforcement
Crimestoppers	Lobby Group
Cross-sector Safety and Security Communications	Information Exchange
Croydon BCRP	Business Crime Reduction Partnership
Cyberst	Cyber Security company
Enfield Council	Local Authority
Facewatch	Technology company
Federation of Small Businesses	Trade body
Fraud Advisory Panel	Charity
Hammersmith Fulham Council	Local Authority
Haringey Council	Local Authority
Harrods	Retailer
Havering Council	Local Authority
Heart of London Business Alliance	Business Improvement District

Leanne Monchuk, Huddersfield University	Academic
Littoralis	Technology company
London Business Against Crime	Business Improvement District
London CCTV Managers Group	Professional organisation
London Chambers of Commerce and Industry	Trade body
London First	Lobby group
London Riverside BID	Business Improvement District
Merton Chamber	Trade association/organisation
MPS	Law Enforcement
National Crime Agency	Law Enforcement
National Fraud Authority	Government
National Pubwatch	Trade body
Newham Pubwatch	Trade body
Northbank BID	Business Improvement District
ORIS	Trade body
Pub Watch SE1	Business Crime Reduction Partnership
Redbridge Council	Local Authority
Royal Borough of Kensington and Chelsea	Local Authority
Safer Croydon Partnership	Local Authority
Safer Lewisham BCRP	Business Crime Reduction Partnership
Sainsburys	Retailer
South Bank Employers	Business Improvement District
Southwark Community Security Zone	Community Security Zone
Tech UK	Technology company
TNT	Retailer
Tobacco Manufacturer's Association	Trade association/organisation
Vauxhall One	Business Improvement District
Victoria BID	Business Improvement District
Cyber Business Breakfast Notes Nov '13	Roundtable event
Intellectual Property Round Table Event slides Jan'14	Roundtable event

