

Date: Tuesday, 26 November 2013 Location: Committee Room 4, City Hall Hearing: MOPAC Challenge - Business Crime

Start time: 10.30am Finish time: 12.00pm

Members:

Stephen Greenhalgh (Deputy Mayor for Policing and Crime)
Faith Boardman (MOPAC Challenge Member)
Jeremy Mayhew (MOPAC Challenge Member)
Jonathan Glanz (MOPAC Challenge Member)
Steve O'Connell (MOPAC Challenge Member)
Helen Bailey (Chief Operating Officer, MOPAC)

Guests:

Simon Pitkeathley (Director, Safer London Business Partnership)
Stuart Turner (Director, Safer London Business Crime Reduction Partnership)
Alison Parkinson (Directory Security Manager, Next)
Stuart Emmerson (Development Manager, Federation of Small Businesses)
Philip Jones (Security Manager, Westfield Shopping Towns)
Trevor Pearce (Director, Economic Crime Command, National Crime Agency)
Commander Steve Head (City of London Police)

Metropolitan Police Service representatives:

Deputy Commissioner Craig Mackey Commander Simon Letchford **Stephen Greenhalgh (Chair):** Delighted that we have an audience because I think this is an incredibly important topic that focuses on business crime and we have a galaxy of stars that will be presenting evidence. Also we have got pretty much every tier of policing before us today which shows you just how important that policing takes the issue of business crime. So I am delighted both the Deputy Commissioner and Commander Letchford are here but also colleagues from the National Crime Agency (NCA), newly created, but also City of London Police that leads on economic crime. So fantastic to see you all. Also we are going to be hearing from people who are actually at the coal face, the Business Improvement Districts involved in partnerships, but also businesses themselves are also going to be providing some evidence.

Today is the formal day when we launch the Mayor's Office for Policing and Crime's (MOPAC) consultation on business crime so this is definitely not the last word. It is the first very formal word about what the Mayor's intentions are when it comes to developing a clear Business Crime Strategy for London. But, before we kick off, I know that some of my colleagues want to go through the formalities of declaring their interests. So Councillor Glanz?

Jonathon Glanz (MOPAC Challenge Member): Indeed. I think it is appropriate that I declare that I chair the Safer London Business Partnership from whom we will be hearing evidence today. Stuart Turner is a colleague and friend of mine.

Stephen Greenhalgh (Chair): Great. Fantastic. Any other declarations of interest? You must have something, Jeremy [Mayhew]!

Jeremy Mayhew (MOPAC Challenge Member): I was about to say maybe the right thing is to declare that I am a City of London Corporation Common Councilman and of course the City of London is the police authority for the City of London Police.

Faith Boardman (MOPAC Challenge Member): I think I should declare that I am the Treasurer of the Vauxhall Business Improvement District (BID) and therefore involved in the Lambeth extension of that approach.

Stephen Greenhalgh (Chair): Helen [Bailey], have you got anything to declare?

Helen Bailey (Chief Operating Officer, MOPAC): Not that I am aware of, Chair!

Steve O'Connell (MOPAC Challenge Member): For the sake of completeness I am a member of the Croydon BID Board.

Stephen Greenhalgh (Chair): I feel I am so conflicted I am unconflicted! I am obviously the Deputy Mayor for Policing and, equally, I am someone that understands what it is like to build up a business. I am an entrepreneur. My sister is an entrepreneur. I have watched my sister try to build up a business through sweat, graft and hard work and have it nearly collapse because

someone stole nearly £100,000 from her. So the idea that business crime is a victimless crime is one thing that we have to knock on the head and this is why we think it is incredibly important to hear from business, but also how we respond to this very serious crime. If we attack business we are attacking London's prospects as an engine for jobs and growth. I am delighted that we are taking this incredibly seriously but I also declare a personal interest as someone who has always taken great joy but also seen the sadness of what business crime can cause, particularly small and medium sized businesses.

So let's look at the first scale. We have got three parts to today's MOPAC Challenge; the scale of the business crime challenge in London. I think that is very important to get the context of that and we are going to hear some key experts on how partnerships can help to reduce business crime. The second stage is to get a feel for the London response to the business crime challenge, which is obviously logical. Then, finally, a discussion on what we are here today to talk about, which is our draft strategy, and the consultation begins today.

We have a number of people that will be dealing with the response to business crime. Who should I call first? Simon [Pitkeathley], I think. Simon, do you want to come forward and introduce yourself.

Simon Pitkeathley (Director, Safer London Business Partnership): Apologies for the late arrival. I was chairing a meeting next door.

Stephen Greenhalgh (Chair): Brilliant. I was hanging on for you!

Simon Pitkeathley (Director, Safer London Business Partnership): Thanks very much.

Stephen Greenhalgh (Chair): Perhaps if you could introduce yourself.

Simon Pitkeathley (Director, Safer London Business Partnership): Certainly, yes. I am Simon Pitkeathley. I run the Business Improvement District in Camden Town.

For us the interesting thing about the way we have encountered crime and the police over the last few years - and I should say that we are a mixed BID so we have retail, office and leisure members - is the way in which the day and the night time are very different. As I am sure you will hear today there is a lot of under-reported crime in the day time economy. A lot of retail crime is under reported our members are telling us all the time. We could discuss reasons for that but it is a fact that we have to accept. Then in the night time economy there is a very different set of circumstances where licensees are often very nervous about talking to the police - there is a sense in which some of them feel they will get black marks for highlighting things too much. Also, sometimes, you encounter a view that one way to solve a lot of crime, particularly in the night time economy but I think generally, is to shut businesses down. I have heard it said we could solve the crime in this town centre by closing down those three venues.



But of course what they are really talking about there is the mobile phone loss and theft and obviously if you got rid of those businesses they would go.

I think that one of the things I am really encouraged by what I am hearing about MOPAC already is this notion that business is absolutely crucial as a starting point. It is not a generator of crime, it is a generator of the economy. Crime may go with that as businesses improve and grow – and that is not removing the responsibility of businesses to try to deal with that – but we must accept that businesses are a really important part of the economy and crime is just one of the by products of that.

We do various things to try to tackle crime in our area. We run radio schemes to try to link users up with closed circuit television (CCTV) and local police officers. We try to share information. Getting information and sharing agreements is not always easy but we have been working on that for a long time. Again, welcome anything that would help standardise that. I think we find our relationships with the local authority are pretty good but they have been built up over a long period of time and we often have to reinvent them as faces change. Perhaps that is part of life naturally but it is certainly a constant in our lives.

Some of the other things that we have been doing is try to get, with the police and the local authority's encouragement, doormen to help with soft closing, quieter streets initiative, which is, on the face of it, extremely helpful for all concerned. There are some issues with insurance of those door staff, how far away from their premises they can realistically be. Are they working more time than they would otherwise and who is paying for that? Businesses will never fail to remind you of how much tax they pay, particularly when the issue of something like the late night levy comes up.

It is also true - and a little anecdote here - that as we were setting up this quiet streets initiative and we had 18 door staff I think out trying to marshal the streets, manage a bit of a quiet decline to the night time economy, it became apparent that, despite the tasking team that is jointly paid for by the local authority and the Metropolitan Police Service (MPS) and has been very successful in tackling our drug culture - a real success there - there were actually only four officers available to support those 16 or 18 door staff. I think just getting the resource right in the right place is not always as easy as it could be and I think that is a problem that we encounter.

To summarise, the fact that businesses are part of this debate and the fact that MOPAC is looking at businesses as a central part of this discussion is extremely encouraging. If we can get consistency across the piece, both within boroughs but across London as a whole, I think we will do a good deal of good. I would like to say that most of my relationships within my borough are extremely good and extremely constructive and we are all trying to work towards these ends and I think we are starting to get there but this is a very helpful step. That is probably enough from me.



Stephen Greenhalgh (Chair): Thanks for that. Let me take Stuart's [Turner] contribution next so we can focus on the issue around partnerships. I know Steve [O'Connell] will fire some questions. So, Stuart, introduce yourself and a couple of high level points because we are a bit rushed for time today with a lot of people to hear from.

Stuart Turner (Director, Safer London Business Crime Reduction Partnership): Thank you. Okay. Stuart Turner. I am Director of the Safer London Business Crime Reduction Partnership and, as it says on the tin really, it is a group of businesses that have come together to reduce crime.

Predominantly what we do, and our core business of what we do, is radio communication intelligence sharing. What we are trying to do is to stimulate a conversation between businesses. Businesses traditionally will sit as competition and can sit in a silo kind of mentality. What we are trying to do, with the Crime Reduction Partnership, is break down those competition barriers because, as everyone in the room will probably be aware, crime affects everybody and if we can come together in a partnership and start having a conversation then we stand a much better chance of fighting the crime.

We are a pan-London operation, or potentially a pan-London operation. A little bit of our history. We set up the partnership – Jonathan at the MPS set up the partnership – in Soho originally. Very, very successful. I came on board with Covent Garden and the Strand areas and we looked at mirroring what they had done in Soho. They had put radios on all the late night premises, bars, clubs, started getting them talking, and we could see the benefits of that in Covent Garden and down on the Strand so we decided that we would quite like to be part of that. When starting that it became immediately apparent that it was going to be quite expensive to set it up and the businesses that were contributing to us a lot of their money initially was going to go in to back office functions and infrastructure and radios so we decided that it would be far better if we were to have a conversation with Soho, who were already up and running, for us to share some of the costs, which they kindly agreed to, and Covent Garden became part of the Soho partnership under the umbrella of the Safer West End business partnership.

So, as I said earlier on, we provide the radio systems and we provide an online intelligence sharing database. There are two parts to this. The radio part is a very simple way of being able to communicate in real time about problems. Now whether you are retail or whether you are a member of the late night economy bars/clubs you are able to communicate with a police officer who, on the safer neighbourhood teams, will carry a radio. You are able to communicate with a CCTV control room in Westminster's case so that they are able to look at problems that members are experiencing and anti-social behaviour, whether that be theft through retail. But more importantly it allows businesses to be able to communicate with each other. This is the key to get businesses out of this silo mentality and say, "Actually let's be transparent and honest about this. We have an issue, we've got a problem and it affects all of us. How are we going to deal with it?". It is about having the transparency with the police. We are very, very



lucky that we have got Association of Chief Police Offices (ACPO) level, chief officer level, officers that are involved with our Board. Again, we can say to people, "This is transparency. It's open and honest. It's on the table. These are the issues so we can actually deal with it".

Once we identify problems or once member bars or clubs identify a problem then they can take action and they can, potentially, bar the person. We have a system in Westminster where, if you bar from one premises or one shop, then you cannot go in to any of them. That is quite important. Now we have people that will come to us time and time again - and to other BIDs around the country - that will say, "Actually, you know what, we can't get in to any premises with our friends any more. We can't get in to any of the shops [if they have been involved in shop crime] any more" and that has a real impact. But it only works if businesses work together.

Stephen Greenhalgh (Chair): I think you made a good point about breaking down the fact that they are competitors but collectively they can work together to create a safer environment for their law abiding customers and people in the West End.

Listen, Steve O'Connell's bursting to ask you questions. I cannot contain him! Thank you, Steve.

Steve O'Connell (MOPAC Challenge Member): I am beside myself with questions! Thank you very much. Stuart, for you initially, thank you for highlighting that because in this arena and subject matter - I have been around the block a few times - I have not heard your august organisation and I am interested to hear about it. One question I have got for you. You talked about it particularly being centred around Soho and Covent Garden and you pride yourself at having an ACPO officer on your Board and all that sort of stuff. Clearly this is excellent for a central London contained high profile area but what about the outer reaches of boroughs? If we are trying to sell this idea to a Bromley or to a Sutton --

Stephen Greenhalgh (Chair): Or a Croydon.

Steve O'Connell (MOPAC Challenge Member): Or indeed a Croydon. I deliberately did not mention that! You seem to be very town centre centric. How would you challenge that?

Stuart Turner (Director, Safer London Business Crime Reduction Partnership): The model that we have will work in any town centres in essence.

Steve O'Connell (MOPAC Challenge Member): Or district centres?

Stuart Turner (Director, Safer London Business Crime Reduction Partnership): In district centres. Now obviously we have got Business Improvement Districts that are geographical. We are in a position to be able to sweep up all around those sorts of areas and we do support the BID so a lot of the stuff that we do with the radios and the communication



infrastructure, why duplicate it ten times at a cost when perhaps BIDs and other Business Improvement Districts can come in and we can centrally procure --

Steve O'Connell (MOPAC Challenge Member): That was my next challenge back. What you are doing, Simon and BIDs elsewhere, will have a crime reduction part of their piece. In fact that might have been the top priority for their members when they did the vote; was about we want our levy and the bulk to go to police or whatever. So where there are BIDs are you not just duplicating?

Stuart Turner (Director, Safer London Business Crime Reduction Partnership): No. What our vision would be would be very much to help service BIDs. If we can provide a service at a cheaper price, for example, if we are buying lots and lots of radios we can provide a BID with radios at a cheaper price. We concentrate solely on crime so whereas the Business Improvement Districts have a multi-disciplinary task where they will be looking after the environment and such like, we would just look at crime.

Steve O'Connell (MOPAC Challenge Member): Okay. I get that. Turning perhaps partly to Simon, I want to touch upon the late night levy. From my questions around London I have had some mixed feedback on the attraction to boroughs in imposing the levy, and the attraction to businesses. What is your take on the late night levy?

Simon Pitkeathley (Director, Safer London Business Partnership): Well, firstly, I think businesses already pay an awful lot of tax and you want to encourage businesses to grow so they can pay more tax, not penalise them by taxing them without growth. I think, secondly, businesses often make good and very local and committed contributions through Business Improvement Districts.

Steve O'Connell (MOPAC Challenge Member): Is Camden operating the levy?

Simon Pitkeathley (Director, Safer London Business Partnership): No.

Steve O'Connell (MOPAC Challenge Member): No. Right.

Simon Pitkeathley (Director, Safer London Business Partnership): But I think there is a growing suggestion – I avoid using the word threat – that they might. So I think where businesses are already making a contribution to a Business Improvement District because, thirdly, the levy is not hypothecated so a large proportion of it can be spent anywhere. I would say it is a –-

Stephen Greenhalgh (Chair): Is there a bar on hypothecation?

Simon Pitkeathley (Director, Safer London Business Partnership): I think up to 30% can stay locally.



Steve O'Connell (MOPAC Challenge Member): Yes. 70/30 split.

Simon Pitkeathley (Director, Safer London Business Partnership): So 70% can go elsewhere.

Stephen Greenhalgh (Chair): Can you stop the 70% going elsewhere? Is there any reason --

Simon Pitkeathley (Director, Safer London Business Partnership): Well I cannot. You might be able to!

Stephen Greenhalgh (Chair): What if we said it could all go where it is raised?

Simon Pitkeathley (Director, Safer London Business Partnership): I would still say, where businesses are paying to a Business Improvement District they are doing their bit, actually, so it is unfair to add an additional levy on top.

Faith Boardman (MOPAC Challenge Member): This all feels very centred around Business Improvement Districts and I know that those can be really valuable as a catalyst. But what about the areas and the town centres that do not have BIDs?

Stuart Turner (Director, Safer London Business Crime Reduction Partnership): That is exactly one of the areas that we can actually sweep up, if you like, because there are areas that do not fall within the Business Improvement Districts and the business model, or the model that we have, allows people to pay a separate single one off fee to join the partnership, but gain the benefits of everybody else. So, yes, we are able to sweep. So if you have got a store, a local store, a local shop, that does not sit within the BID but they can still join Safer London Business Partnership.

Faith Boardman (MOPAC Challenge Member): So, in your view, this model could be rolled out across any local centre?

Stuart Turner (Director, Safer London Business Crime Reduction Partnership): It is very simple. It is very simple. That allows us to be able to go in to any centre, whether it is a Business Improvement District or not. We either are in a position to service the Business Improvement District's needs and we become a service provider to them, but equally we are in a position where we can mop up everything on the outside. Crime is not a respecter of boundaries. It is going to go anywhere.

Steve O'Connell (MOPAC Challenge Member): Going back to Simon to challenge one of your earlier comments about resources and the police's attitude to the night time economy - because I have a keen interest in the night time economy; Croydon has got a thriving night time



economy. Your analysis was it is a little bit about mobile phone theft and it is about it is wrong to close premises down. Everyone wants a thriving night time economy. We all --

Simon Pitkeathley (Director, Safer London Business Partnership): Not everybody does actually, but, yes, they insist.

Steve O'Connell (MOPAC Challenge Member): Everybody in this room probably. Everyone in this room possibly/probably. Isn't one of the very fair critiques if you have had a club open until 2am/3am/4am/5am it is quite a disproportionate drain on police resources and those resources, perhaps under the new policing model, are being pulled away from other parts of the borough and they are taking really an operational view that, actually, "This is not good for the borough if our resources are disproportionately drained". How would you respond to that, Simon.

Simon Pitkeathley (Director, Safer London Business Partnership): I think I would respond in the point I made earlier; you want a thriving economy and you want businesses to do well in order that they pay more tax and in order that they fund those services really. If they are already contributing to something like a Business Improvement District then I think that that should be sufficient. I assume you are heading us towards the late night levy again?

Steve O'Connell (MOPAC Challenge Member): No, no. No, I was not.

Simon Pitkeathley (Director, Safer London Business Partnership): Oh right. Sorry.

Stephen Greenhalgh (Chair): Actually, Simon, I am going to head it off towards a -- he has got a Croydon prism and I have got a Hammersmith and Fulham prism. The reality is, with the Local Policing Model (LPM) - and I am sure the Deputy Commissioner can amplify this, and Commander Letchford who is running a quarter of London anyway - there is the flexibility of putting more officers on late shift and Friday and Saturday nights but there is only a certain amount that you can resource that.

I think what Councillor O'Connell is saying is there there is an option to think about additional resourcing beyond the amount that has been committed to. There is a clear commitment about what is going in by 2015. I think that responds to the fact that actually you have got a choice about how much investment you put on door staff and the extent that you resource policing and your public safety choices if anything. I do not think there is an issue around double taxing but the commitment that business will have to ensure that the patrons have a safe environment and the contribution they can make potentially, in partnership with the local authority, you can get a good deal, buy one get one free, to fund extra police officers in town centres, like we did successfully.

Simon Pitkeathley (Director, Safer London Business Partnership): I think that is absolutely right. I suppose, in Camden, we do often have a situation where the night time economy - or the licensed premises - are blamed for an awful lot of difficulty.

Stephen Greenhalgh (Chair): Sure.

Simon Pitkeathley (Director, Safer London Business Partnership): It is often not as straightforward to pin a particular anti-social behaviour on a particular premises and the two issues that, in a sense, fall outside the licensee's management ability, yet cause most disruption, are dispersal and pre-loading. So a lot of the problems associated with those two things are often foisted on the licensee but they are actually things they can have limited effect upon.

Stephen Greenhalgh (Chair): I understand. That is a good point. No one should ever villainise licensees in general. You will all accept that, across London, there are problem premises and we need to do what we can to deal with those.

I think we are going to draw this bit to a halt. What I understand from the Safer London Partnership is really an offer to BIDs across the capital to say, "Here are some services we can provide and are potentially scaleable. We are not foisting them on any one but there they are if you want to have a radio system that works for the West End. That's something that is valuable and it connects you with the police and it connects premises together. We've got an online intelligence database or platform. Potentially that could serve wider than the West End. It was developed obviously in the biggest night time economy but it could potentially move to the second biggest, [which is Kingston according to my data], or the third biggest which might be Camden or the fourth which might be Croydon".

The second thing I want to say is let's, in the context of public safety, consider above the LPM what can be done to have extra policing in areas where we have an intensive night time economy because there will never be enough.

The third thing I would say is that I am going to make a policy on the hoof that whatever we raise locally should be spent locally. That is 100%. Now the 70% that is supposedly under the discretion of MOPAC, it probably would be fair to say that the monitoring officer and the chief operating officer would not want us to spend it on stuff that we could not support, but it would be spent locally. It would not be raised locally to be spent in other parts of London. I think you can have that blanket commitment, Camden, Croydon, whoever is in interested in night time levies. We are not going to foist that on any one. That has to come from the ground up. But then that does help to raise extra police officers so I think that should be welcomed.

Simon Pitkeathley (Director, Safer London Business Partnership): Can I quickly throw one last point in there, Stephen, a technical one?

Stephen Greenhalgh (Chair): Yes.



Simon Pitkeathley (Director, Safer London Business Partnership): I think there are technical developments coming through that we are looking at with a project funded by the European Union (EU) around whatever this amorphous internet of things is. I think better understanding the movement of people through those kind of location device technologies and data sources is a really interesting way of also looking at a lot of these problems, which I think is very important.

Stephen Greenhalgh (Chair): We are very interested in that research and we want to make sure that what Camden learns can be good for London so we will just keep a weather eye on whatever develops.

I think, generally, we need to be a lot more transparent, as transparent as we can be, about what is going on. We never forget the benefits of the night time economy, never forget the benefits of business, but we should know where crime is an issue and we need to reduce crime and be open about that, and not fearful. I commend all of what you are doing in bringing businesses closer together to provide a collective voice to make sure that we can have a safe environment.

Let's move on to the next area which is a lot to cover in a short time. One of the things that I knew absolutely nothing about but I became so fearful about I tried to find the business ten steps to cyber security and failed, so if anyone can direct me to where it is. This issue about cyber fraud or cyber enabled fraud. We have two experts; Alison Parkinson from Next. Send my best wishes to Lord Wolfson! I was very good friends with him at university before he became famous so will you send him my best wishes. Also, Stuart Emmerson, delighted, from the Federation of Small Businesses, representing the sort of businesses I am more used to, rather than the inter galactic ones like Next! But both of you welcome. It is an issue right across business, this issue of cyber fraud. I know you have got a slide, Alison, and some other points to make --

Alison Parkinson (Directory Security Manager, Next): No, we are not going to use a slide at the moment.

Stephen Greenhalgh (Chair): Okay.

Alison Parkinson (Directory Security Manager, Next): Primarily I am from Next but I also chair the Online and Mail Order Forum which is a collective of a number of large retailers. It is all about this lack of investigation. It is a two pronged approach for retailers in internet crime a) because it is a faceless crime and people think they can just get away with it but, where we are reporting, there is no support, or the consensus is there is no support in terms of action for all in the National Fraud Intelligence Bureau (NFIB) and I know all that is changing. But primarily, when it gets through action calling in the NFIB the inconsistent approach from the MPS

boroughs is leading to a lack of confidence so nothing is getting investigated. The impact of that on businesses is massive. We are, as a company ourselves, invested heavily on resource --

Stephen Greenhalgh (Chair): Do you really mean nothing gets investigated?

Alison Parkinson (Directory Security Manager, Next): Well not unless we do it as a call for service. Whether people understand what a call for service is I am not sure, Stephen.

Stephen Greenhalgh (Chair): Can you explain?

Alison Parkinson (Directory Security Manager, Next): Where you have got an actual avenue in an investigation or you dial in and do 999 and do your own investigation and you have a person to apprehend it is not getting investigated at the next level. So the person is getting arrested and it is then not getting investigated further down the line.

Now Next have had 50% support from an area from Simon's South London Crime Squad but, at the end of the day, they are not Thunderbirds! So it is really, really difficult. The inconsistent approach is leading to I pick the phone up and I go to one of Simon's guys, Lee Hill. I know I will get a response from him but what happens when I have to move in to North London or East London? It is not just happening. Next have offered, as you know, as well as other retailers, to put significant funding in to a specialised unit to investigate internet crime.

Stephen Greenhalgh (Chair): Yes. I have had a letter from Simon. I much appreciate that initiative. What you say, frankly, bowls me over as a point and I think we are going to get a policing response. What do you think drives the lack of response? Clearly we are seeing a pattern of crime changing from the off line and the smash and grab and cash and transits disappeared to the online world where --

Alison Parkinson (Directory Security Manager, Next): Because the clear message that is out there is it is not investigated and there is no apprehension of criminals so, "Let's get away with it. We don't need to go in to a store and shoplift any more. We can do it online". But the difficulty is I think probably businesses or other people will look and go, "You know what, you can afford this" or, "You can do it yourself. Stop the system". But, primarily, we are there as a sales driven business and we are dis-encouraging the general public to come and shop because we are making so —

Stephen Greenhalgh (Chair): Can you give a figure for the losses that you are getting through online fraud? Not as Next itself. Can you give me a figure? Just give an idea of the value.

Alison Parkinson (Directory Security Manager, Next): We lose billions. Absolutely.

Stephen Greenhalgh (Chair): How much billions? Billions or hundreds of millions or billions?



Alison Parkinson (Directory Security Manager, Next): Well you are looking at billions.

Stephen Greenhalgh (Chair): Billions of losses through online fraud. Billions.

Alison Parkinson (Directory Security Manager, Next): Yes. Absolutely.

Stephen Greenhalgh (Chair): Billions.

Alison Parkinson (Directory Security Manager, Next): Yes.

Stephen Greenhalgh (Chair): £1 billion? £10 billion?

Alison Parkinson (Directory Security Manager, Next): No. You are looking at well over £20 billion, Steve [Head], I am sure.

Stephen Greenhalgh (Chair): £20 billion? £20 billion?

Commander Steve Head (City of London Police): It is a significant figure. I do not know if I could quote the £20 billion figure but --

Stephen Greenhalgh (Chair): You just have. £20 billion?

Deputy Commissioner Craig Mackey (MPS): £27 billion is the national fraud estimate.

Stephen Greenhalgh (Chair): But that is all national fraud. That cannot just be retail. Retail online fraud. That cannot be £20 billion surely. Is it?

Alison Parkinson (Directory Security Manager, Next): Absolutely.

Stephen Greenhalgh (Chair): Is it £20 billion?

Deputy Commissioner Craig Mackey (MPS): They do not break it down to retail but the only --

Alison Parkinson (Directory Security Manager, Next): No, it is a collective number.

Deputy Commissioner Craig Mackey (MPS): National Fraud Authority report - and it is an estimate - £27 billion fraud is cybercrime.

Stephen Greenhalgh (Chair): Gosh. It is not small change is it?

Deputy Commissioner Craig Mackey (MPS): Oh it is not.



Stephen Greenhalgh (Chair): A lot of it gets stopped as well.

Jeremy Mayhew (MOPAC Challenge Member): If you remember what Ronald Reagan [US President 1981-1989] said, he said, "\$1 billion, \$1 billion there and very soon you are talking real money!".

Stephen Greenhalgh (Chair): I think £27 billion is a hell of a lot of cash and thank you for the offer of support for galvanising the policing response in this area. Is there anything you wanted to say?

Alison Parkinson (Directory Security Manager, Next): No.

Stephen Greenhalgh (Chair): Okay. Great. So, Stuart, in the interest of speed, do you want to give a smaller business perspective.

Stuart Emmerson (Development Manager, Federation of Small Businesses): Yes, absolutely. Perhaps I can help with the figures as well. The National Security Strategy has estimated that cybercrime costs the UK economy around £27 billion a year. Federation of Small Businesses (FSB) research gauges that the annual cost to small businesses of fraud and online crime is just under £4,000 a year. So small businesses --

Stephen Greenhalgh (Chair): £4,000?

Stuart Emmerson (Development Manager, Federation of Small Businesses): Yes. For each business.

Stephen Greenhalgh (Chair): I was about to say! I thought my abacus was not calculating correctly!

Stuart Emmerson (Development Manager, Federation of Small Businesses): For small businesses, for micro firms, who have incredibly small profit margins no small figure.

Stephen Greenhalgh (Chair): Sure.

Stuart Emmerson (Development Manager, Federation of Small Businesses): Around three in ten of our members have been a victim of fraud over the past year. The three types of fraud experienced included customer or client fraud, card fraud including cards not present and computer software fraud. Small retailers are particularly reporting the impact on their business of charge backs from card not present fraud transactions and that is something we would like the banks to do more in terms of communicating that to small firms. Businesses have had particular issues with virus infections, hacking and electronic intrusions and systems security breaches and losses. But the good new is that two thirds of the businesses that we have



surveyed have acted in some way to prevent fraud so that is the installation of security patches, risk assessments and staff training.

But perhaps one of the things we might come on to - and you alluded to yourself, Stephen - was the difficulty of finding reliable and timely information. Certainly I know the FSB website, for example, has ten steps that I could direct you to that can assist with the prevention of cybercrime. So in order to contribute to the debate the FSB recently published a well received report, Cyber Security and Fraud, and the impact on small businesses which --

Stephen Greenhalgh (Chair): Stuart, I am sorry to stop you in mid flow but I was quite interested in the kinds of fraud and crime that is suffered by small businesses. You mentioned card fraud, computer software fraud. What exactly do you mean by computer software fraud?

Stuart Emmerson (Development Manager, Federation of Small Businesses): That is just our members potentially hacking in to the various software packages that whatever particular companies may have and causing the systems to slow down, malware issues.

Stephen Greenhalgh (Chair): That is malware viruses, electronic hacking and all that sort of stuff?

Stuart Emmerson (Development Manager, Federation of Small Businesses): Yes. Absolutely.

Stephen Greenhalgh (Chair): And phishing, which I am learning about. What was the third thing? Malware, phishing, botnets, all that stuff. What is the other one?

Stuart Emmerson (Development Manager, Federation of Small Businesses): There was customer or client fraud, card fraud including card not present.

Stephen Greenhalgh (Chair): Customer or client fraud. What is customer or client fraud?

Stuart Emmerson (Development Manager, Federation of Small Businesses): That can be physical fraud on the premises.

Stephen Greenhalgh (Chair): So basically people diddling you out of money rather than card fraud?

Stuart Emmerson (Development Manager, Federation of Small Businesses): Yes, absolutely.

Stephen Greenhalgh (Chair): How much of it is in the cyber world?

Stuart Emmerson (Development Manager, Federation of Small Businesses): Breaking it down, customer or client fraud is 13%, affects 13% of our members, card not present fraud 10% of our members and computer software fraud 6% of our members.

So moving on to some of the recommendations that we will be feeding in to the consultation we are recommending that businesses obviously look at the guidance from Action Fraud, Get Safe Online, the tips that we produce. For bank and payment providers we would like to make them more aware of the online security that is available. We think banks need to be more up front about the risks of card not present fraud and making clear the message that authorisation does not always mean payment.

Police forces were incredibly aware that resources are finance so it is about managing the expectations around police responses to fraud. There is certainly an issue with reporting of crime and confidence amongst small businesses in terms of recording crime. It is certainly a key issue. We are also encouraging the use of regional networks such as the regional Fraud and Business Forums and the National Business Crime Forum that the FSB chairs.

But, to conclude, I think there is a lot of excellent advice out there. The key message is that a lot of our members do not have the time or the resources to access it so it is finding almost that single point of information that is credible, reliable and timely. Just to finish, the former head of the Serious Organised Crime Agency (SOCA) - this was an event that Rob Paul, who is in the audience, organised for London First - said that if small businesses kept their basic firewalls up to date, checked regularly, 90% of the threats could be dealt with, which I think is a cause of optimism.

Stephen Greenhalgh (Chair): A lot of this prevention message there.

Stuart Emmerson (Development Manager, Federation of Small Businesses): Absolutely.

Stephen Greenhalgh (Chair): Okay. Well, Jeremy, you were going to ask some questions.

Jeremy Mayhew (MOPAC Challenge Member): I have got three questions. One for the City Police, one for the MPS and one more general one about awareness. For the City Police under Action Fraud how are you gearing up for reporting by big and smaller businesses --

Stephen Greenhalgh (Chair): Jeremy, we are trying to do the policing response next. I thought you were just doing some questions off ...

Jeremy Mayhew (MOPAC Challenge Member): No. Okay. Forgive me.

Stephen Greenhalgh (Chair): Okay, well I will segue this and then we will move straight in to



Jeremy Mayhew (MOPAC Challenge Member): I was doing what I was told to.

Stephen Greenhalgh (Chair): Do not worry. I am sure you are. But I --

Jeremy Mayhew (MOPAC Challenge Member): Forgive me.

Stephen Greenhalgh (Chair): Sorry, it is no problem. We have not rehearsed this as you can see! Thank you for the message around investigation. We cannot be seen as a soft touch for fraudsters. I am sure that comes through in the meeting response. Actually your message about awareness really strikes a chord for me as someone who understands the strains and complexities of building up a small business where you are often cash poor and time poor and even if you are cash rich you are always time poor. I think the need to create some kind of package of awareness to really arm businesses to deal with this threat is very, very real and I do not think it is something that, for London anyway, we can simply outsource to a Whitehall department like BIDs. We need to ally with the FSB, we need to work with colleagues at the NCA and policing colleagues here to ensure that small businesses are very aware of the threat and do take the necessary steps and provide that support. So I think it is a point well made. Your survey also has to feed in certainly to our consultation and the points that you raise.

What I am keen now - sorry, Jeremy - is you have heard some points around partnerships and some issues around the night time economy and I think I am going to look to the MPS to respond to some of those issues. It would particularly be helpful if you could talk about what you have learned from your hotspot analysis and how you work with business crime reduction partnerships, with the Safer London Partnership and BIDs in general, and then perhaps we can look at cyber fraud after that. But let's start with the night time economy and town centres - what is your phrase, district centres? Let's look to the MPS first on that issue.

Deputy Commissioner Craig Mackey (MPS): If I just give the overview and I will pass to Simon. First of all, from what we have heard, you have heard outlined the complexity of the problem because you have heard about five different crime challenges across there; night time economy, day time economy and the things that affect business that operate in the day time, cyber enabled fraud and the capacity around that from our own people doing it through to those organised crime type attacks. The interesting bit that we have seen is that growth of that area that is around cyber enabled criminality, and it can take a variety of forms, as we have spoken about there.

But focusing first on the ones around the night time economy and the day time economy it is absolutely clear, as we talk there, they require a different range of responses in terms of doing it. So things like the partnership, absolutely, because, at its heart, is the flow of information and the exchange of information and understanding these. Because, as we have heard throughout all of the presentations, one of the big issues is education in terms of the ability to get information out to people to allow people to take realistic measures but also, importantly, the information that comes from businesses to us that allows us to make interventions around

organised crime groups and around individuals who are causing particular harm in their community. So getting that working and getting that information flow is absolutely crucial and that is about having the right people in the partnership because, in the nicest way, we can write information sharing agreements, we can write documents and those sorts of things, but we all know that actually partnerships work best where it is people who trust each other, they have been in a relationship for a reasonable period of time – and I mean by that professional working relationship in terms of they understand, they know where things are coming from and they know the challenges – and things then actually start to move in terms of doing it. There are some fantastic examples across London, not just the ones we have heard now, where these things are really starting to have an effect and real activity is taking place at a very local level.

The challenge, as was highlighted from some of the questions, is how do we get that to a consistent level? Because the MPS' strategic role in this is it is in our interests to have vibrant economies and vibrant businesses and workplaces across London. We want that as much as anyone. I think the useful comments about not seeing businesses as crime generators or hotspots – absolutely get that. Absolutely understand that. We have got to change the nature of that sort of debate in terms of what we do and how we work around it.

We have also got to collectively applaud and celebrate those well run businesses. We talk a lot about the night time economy. We all know -- and we know from some of the work we are doing recently where we have just taken the trouble on some of our operations that are more covert in nature where we actually test out how businesses are run to write to the premises and say, "You don't know it but two nights ago we visited your premises and we'd just like to applaud the way it was run. Really, really well run". So I think it is important that we, collectively, celebrate those good things that are working well, work how we spread some of this further afield, so the really good practice that we have seen with the West End and with Camden and other parts of London, that actually that is the norm. That is the base line on which the Bromleys, the Croydons, everyone, Kingston, builds from, and we learn those sorts of things and roll them out.

Simon, is there anything else?

Commander Simon Letchford (MPS): I think the key thing for us, in terms of how we are more effective in our response, is the intelligence piece. So certainly through the hotspotting and the analysis what we start to identify is that 15% of all crime in London is associated to businesses, whether as victims or locations or their customers. When you start to break that down the top ten locations represent 23% of that figure. So there are some real opportunities, with some targeted partnership work, to actually make a significant --

Stephen Greenhalgh (Chair): Say that again? Top ten ...?

Commander Simon Letchford (MPS): The top ten locations contribute 23% --



Stephen Greenhalgh (Chair): About a quarter of business crime, which is 10%, so that is significant isn't it?

Commander Simon Letchford (MPS): Yes. Is in the ten hotspot locations. As Simon pointed out, you do get a different day time type offending with a night time offending. You also get a difference between mobile phone theft which is a large volume, which is targeted around crowd rich environments, so offenders know that if they go to certain locations, particularly where people are dancing and they are in close proximity, it is easier for them to steal phones. So it is about how we work with those businesses to design out crime. Then obviously you get the alcohol generated type offences.

Our mantra has always been about we want successful businesses, we want businesses to employ local people to regenerate the communities and employ local people, because that reduces crime, but what we will not accept is badly run premises that attract people from across London who know they can go there, they can deal drugs, they know they can get drunk without being challenged, and they are the sort of places that we want to work with in the initial stages but, at some point, there must be a consequence. So we know that a number of places where we have tried to engage are just badly run then we will close those premises down, and we will do that as quickly as we can.

The other thing as well is trying to move away from just focusing on particular crime types or premises to more about the place. We are certainly doing it now. There are three hotspot locations in London, corporate hotspots – one in the West End, one in Lambeth and one in north London around Hackney/Shoreditch/Tower Hamlets – where we start to try to identify what the generators are. Picking Lambeth – because it is one of my areas – we know that there are a number of things that drive crime within that area, whether that is burglary, whether it is theft, robbery, and part of it is about the night time economy, part of it is about the transport routes.

Then we look at how do we start to look at longer term problem solving. We, the police, can do the initial crack down. The important piece is the consolidation. It is really where we are really supportive of a Safer London Partnership type BID process where, working with partners, you can start to design it out longer term. So if we close a number of premises because they are badly run and they are bringing the area down we want to make sure that something positive goes back in there, and it is not just an empty shop, because that does not particularly help anybody. So certainly around the prevention and partnership piece we are really, really keen on.

The other thing is about mobilising communities as well to start to take responsibility so, again, it is about how you bring the different pub watches, Neighbourhood Watch and everybody else together so that, collectively, we can start to retake that space back as a collective -- it is our space, we can go there, we want to enjoy ourselves and --

Stephen Greenhalgh (Chair): I am glad you mentioned them. The thing I am struggling with is there are all these pub watches, shop watches, whatever. We have all seen different versions of that. Club watches. Then you have got partnerships in terms of business crime reduction partnerships and BIDs. It is quite a confused landscape. I am interested in can we get -- I am not trying to stop anything going on because it is always good to see activity when you think about public safety, but how do you get some coherence to all of that?

Commander Simon Letchford (MPS): That is part of the Safer London Business Partnerships; actually you bring them together. So rather than people just think they are about pub watch and that is the only thing they are interested in, actually how can they affect other types of activities? So we know theft of mobile phones is a big issue for London at the moment. How do the pubs start to work -- how do we share that information that identifies those small number of individuals that are targeting those premises with prevention messages? How do we give people prevention messages around -- we know sexual offending goes up during the Christmas period. People are more vulnerable. So how do we give those key prevention messages out before people are targeted? So there are lots of opportunities to try to bring people together, rather than break up the groups and try to get one group, because it will never happen will it, you will always have different interests in groups.

Stephen Greenhalgh (Chair): So for policing, rather than the businesses themselves, the Safer London Partnerships radio stuff and the online intelligence sharing, are you a great fan -- it is not in your patch, is it, it is in the West End. Does it work in --

Commander Simon Letchford (MPS): Lambeth. No, absolutely. I will give you an example. We know some of the -- the O2 down in Brixton. We know that by early communication they actually start to spot people in the crowd who are the people who specifically target those locations to try to steal property. So it is about them helping the police to prevent and identify and work with us. We know these people travel around the area so they travel across London, they travel nationally and they travel internationally. We know that some of our offenders will travel in to Europe to target specific music groups and venues. So it is about the businesses identifying and working with us to start to target that small number.

Stephen Greenhalgh (Chair): So you are already seeing the roll out of some of the capabilities you have talked about in to south London round venues like the O2?

Commander Simon Letchford (MPS): Yes.

Stephen Greenhalgh (Chair): That is really good. That is really impressive.

Faith Boardman (MOPAC Challenge Member): But I think there is a real capacity issue amongst small businessmen. My first job was on a Saturday morning helping my Dad in his small shop so I have a lot of sympathy for that --



Stephen Greenhalgh (Chair): Look how far you have come, Faith! You share that with Margaret Thatcher.

Faith Boardman (MOPAC Challenge Member): Indeed I do! And it stumped me as well as her! But my experience from that is that they work six days a week, they do the books on the seventh, and they may go to church on Sunday mornings, which again is Mrs Thatcher! So how do you really bring them to the table? I also know, from my experiences with Lambeth Council, that in somewhere like Brixton, where you have got lots of market traders, you have got quite a fluid situation, quite a complicated situation, where traders come and go. How are you going to make sure that we can get a holistic view and can the councils help you in that?

Commander Simon Letchford (MPS): Yes, absolutely. The first thing, the obvious answer to that, is that the Safer Neighbourhood teams, our investment in more officers on Safer Neighbourhood teams, to start to identify those local issues. I think our approach is we cannot provide a --we just have not got the capacity to give a service to every single person. It is about identifying where we are going to have the greatest impact. So not everybody is affected by this. Not every licensed premises has crime in it. So actually, rather than trying to give a blanket to everybody, it is about actually identifying those critical few that are impacting on whether it is public safety or crime.

Going in to the cybercrime issue as well. We have to approach it in a slightly different way now. Rather than just collecting the victims, so we will often see 8,000 victims when we tick the fraud, we have got the courier fraud at the moment, so rather than trying to go to every single one of those victims and provide the same level of response, it is actually to flip it over and identify the small number of people that are committing those crimes and then to target those as an organised crime group, which is certainly the focus that we are now starting to put on it.

Obviously working with Next in terms of some of the delivery activity of how do businesses start to help us? So we are developing managed deliveries, which is something that Next and Shop Direct have pioneered for us, which is that the businesses will do an awful lot of the preparatory work. What we have to now get in place is that consistent response so it does not matter if they go to Camden or Lambeth, the response they get is the same, it professional, it is consistent, and we start to take these small groups of individuals that are actually targeting a large number of people.

Stephen Greenhalgh (Chair): Faith?

Faith Boardman (MOPAC Challenge Member): I did not hear an answer to my question about councils. Most of our other community safety activities the local authorities now have a very big role to play. What is their role and are they stepping up to it?

Commander Simon Letchford (MPS): Obviously within the safer partnerships they are our key partner in that. They are the people that bid for the funding to set it up, the start up costs.

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MOPAC have been very good in terms of pump priming, effectively, a partnership that gets it going and then it becomes self-generating. So I think the council have a huge role. There is certainly a key role around communication, around getting those communication networks going. Small businesses have not got the time to find the information. Stuart's point about what we have to do is we have to target the information to the right place at the right time, rather than people trying to find it.

Stephen Greenhalgh (Chair): Just interject. This is really for Simon's benefit. Getting close to councils is really important. I think a couple of things that will help is the fact that councils will retain some of the upside on business rates under the new -- previously, when I first started in local government, it was a really just to capture the cash and hand it over to Whitehall moment. Higher interest rates that you made on the billion disappeared. But there is that upside now that you are targeting more people. I do not think it is a perfect system but local councils are thinking about that anyway. Secondly, if you get close to a local council the BID could work with the local council in the way that you do get the buy one get one free so there is a real benefit to working together anyway. There is an upside on that. I would really encourage that we make sure the councils are not kept over there and that they are brought very much to the table. I think that is your point, Faith.

Faith Boardman (MOPAC Challenge Member): It is.

Stephen Greenhalgh (Chair): I am very keen - because I did not bring in the colleague from Westfield - so, Philip, you are really here and I have experience - and you are about to have the experience - of a massive shopping centre effect. West London was your touch down in London and it really changed White City incredibly. It was a long time in the gestation but as a multi billion pound investment, 8,000 jobs, massive amount of economic development for a very deprived part of London, and probably, with hindsight, we could have done more around public safety. But actually, through 106 contributions and other things, you have made a massive contribution to town centre policing. But what can we do, effectively, to ensure that we minimise the opportunities for criminals to get rich easily and what can we do to entirely ensure that places are as safe as they can be? I want to really hear from you.

Philip Jones (Security Manager, Westfield Shopping Towns): Thank you, Chair. I am going to talk, if I may, very briefly about the practical application of designing out crime. I would like to emphasise, first of all, I have not been with Westfield since the beginning, 2008, Westfield London, I joined earlier this year. But I come from that sort of background so I do understand, I hope, the problems.

First of all I am going to talk about engagement and our day to day engagement with the MPS is through the Crime Prevention Design Advisor. I perhaps, quite intentionally, will be slightly provocative here but on a day to day basis the relationship is fantastically professional but engagement from a planning perspective can be very difficult, mostly because I think the --



Stephen Greenhalgh (Chair): Is this town hall planning?

Philip Jones (Security Manager, Westfield Shopping Towns): This is the MPS Crime Prevention Design Advisor, our crime prevention link for section 106 generally. I think it is probably resource driven. I think in my borough, the London borough of Hammersmith and Fulham, where I am sitting currently, I think there is one Crime Prevention Design Advisor and spread particularly thin. Certainly with the proposed extension at Westfield I will give you a example of the issues. We have, I think, got to design 30 before we were able to formally engage with the Crime Prevention Design Advisor. That, from my perspective, is far too late so engagement is the first issue. Probably, I would suggest, and it is perhaps an inappropriate comment, but may be resource driven.

Second, once again, Crime Prevention Design Advisor standards. Once again, being slightly provocative, I think one of the issues I have in delivering designing out crime is the fact that there are a plethora of standards, there are thousands and thousands of different sources of standards. Our crime prevention guy comes at us with Secured by Design which is really very good but it strikes me, through bitter experience, that the standards being applied are dependent upon the relevant Crime Prevention Design Advisor. So we might have one standard applied by one Crime Prevention Design Advisor (CPDA) but then somebody else comes along and gives us a slightly different standard. In fact, I have been in design meetings where our local crime prevention chappie says that he actually cannot provide us with a standard because there is not one. So I think engagement and standards are perhaps the first two of our most important things.

Stephen Greenhalgh (Chair): So you want earlier engagement and you want greater consistency around the standards you are seeking to achieve.

Philip Jones (Security Manager, Westfield Shopping Towns): Correct.

Stephen Greenhalgh (Chair): How about engagement? If we talk about the holy trinity you have got you as a client, you have got the CPDA providing professional advice from the MPS, but also what about town hall planning? Because if all of this does not get rounded in to the town hall it is all puff isn't it.

Philip Jones (Security Manager, Westfield Shopping Towns): Yes. That seems to be fairly well developed actually, certainly from my limited experience at Westfield. It seems to be well developed and, in fact, the town hall keep pushing us back to the CPDA because of course the CPDA gives the nod and the wink if we achieve Secured by Design standards. So we are pushed back to the Counter Terrorist Security Advisor and the CPDA to determine whether we have achieved the appropriate standard. Once again, my issue being that I do not actually know what the standards are and, in fact, my designers do not know what the standards are until we get in to a face to face meeting with the CPDA. Then that can be difficult because it depends who is sitting across the table from you.

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I would also like to mention one final thing and, as I say, I intend quite intentionally to keep this brief. That is I am slightly nervous -- and local partnerships are great but I am slightly nervous that our CPDA designs for us around the perimeter of our premises. Okay, we have a fairly hefty facility at the moment, a very large facility with over 300 retailers. That will go, hopefully in the next few years, to well over 400. But we tend to treat the perimeter, the line around our facility, as the actual limit of our design when in fact we sit almost shoulder to shoulder with the BBC, with Imperial College, with the National Health Service (NHS), with the West 12 Shopping Centre, for example. My suggestion to the CPDA - and I have made this very, very often - is that actually move outwards a few hundred yards and present a design for us that perhaps makes it safer for the BBC or for Imperial College or for West 12 as well as for the Westfield shopping centre.

Stephen Greenhalgh (Chair): Okay. Those are really three very important points. I think it is important for the MPS to respond particularly to that point. So earlier engagement you are really calling for. You are calling for a clarity over what are the standards that underpin Secured by Design. Thirdly, think about the wider place as opposed to just the boundary of the particular development.

Philip Jones (Security Manager, Westfield Shopping Towns): Correct.

Stephen Greenhalgh (Chair): Okay.

Commander Simon Letchford (MPS): I agree! Is the simple answer. About four months ago we completely restructured our Crime Prevention Design Advisors. They are now called Design at Crime Officers. There are less of them because when we mapped them across London there were significant inconsistencies. Some boroughs had two or three, some had none. Some of them did it on top of another job. So we now have 32 dedicated Design at Crime Officers who are fully trained CPDAs.

I think we have to be far smarter around early engagement, particularly around the 106 agreements. A lot of previous 106 agreements are about changing the road networks and local schools and we missed the opportunities around crime prevention. I absolutely agree that we need to extend the footprint wider than just that one premises. We have certainly changed the way we deliver those services. We are bringing in a performance framework for them so we can start to see what they deliver. Do they offer value for money? I think, looking forward, are there opportunities to -- do they need to be police officers that do that? So are there opportunities to potentially generate income and then fund those posts? They are the sort of thing that we are starting to move towards but certainly, at this stage, they are police officers and their role is very much that early engagement -- and it does include the Counter Terrorism Security Advisers as well because there is a overlay of roles there as well.



Stephen Greenhalgh (Chair): Okay. That hopefully gives you some confidence that you have been heard.

I think we need to think about this £27 billion problem and I think we need to hear from all three agencies. Perhaps I could start with the top, start with the nation first, and then we will work down.

Trevor Pearce (Director, Economic Crime Command, National Crime Agency): I was rather hoping we would go the other way!

Stephen Greenhalgh (Chair): I want to give the others time to --

Trevor Pearce (Director, Economic Crime Command, National Crime Agency): See how we fit in to the overall scheme of things. Two or three things. Context, first, of the National Crime Agency. Somebody has already touched upon. The National Security Strategy gave us very clearly in terms of tier of threats that cybercrime was a tier 1 threat and organised crime, more broadly, was a tier 2 threat. Out of that dropped much more of a focused organised crime strategy of subsidiary strategies which includes the formation of the National Crime Agency. The National Crime Agency was set up to have a broader remit than the previous organisations, but to have the ability to have a strategic impact and the ability to better coordinate the UK's response - and I highlight the UK's response - to the phenomena we were facing.

So, within that, we have now soon to be five specific commands; organised crime, borders, child protection, economic crime and cybercrime supported by a range of operational capabilities. So I perhaps pick up economic crime and I will deal with cyber because we are beginning to recognise this is indivisible around fraud to a large degree. The role of the economic crime command is to coordinate the UK's response to economic crime. And economic crime, as we see it, a clear half a dozen threat areas, is broader than fraud. I will just run through it. What do we mean by that? It is about market abuse. It is bribery, corruption and sanctions. It is other threats such as intellectual property crime, identity crime, counterfeit currency. It is the use of criminal financing profit so proceeds of crime type activities. It is fraud against the Government including fiscal fraud and there is a £5 billion fiscal fraud problem that HM Revenue & Customs (HMRC) in particular take the lead on. Then it is fraud against the public, the private and the third sectors. I think the third sector sometimes gets left out of this. I know this is a Business Crime Strategy but actually the delivery of many of our services and our local input is through the third sector and I think we do need to make sure that they are covered. Steve will probably elaborate on this but there is a taxonomy I think of 147 different types of fraud. I suppose it matters not which type of fraud you are a victim of if you are a victim but, nonetheless, sometimes we get called up in these clarifications and classifications.

As we see it, our role is to coordinate that UK response. There is excellent work which is done I think by law enforcement partners to my left and right. There are a number of key agencies, regulatory bodies, whom we engage with - the Serious Fraud Office (SFO), the Financial

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Conduct Authority (FCA) etc - who all have very, very competent responses in the areas in which they are responsible.

The challenge I think, as we set up the National Agency and we are only coming up eight weeks old, is not so much the overlap but is there an underlap in our coverage against economic crime in its broadest sense? How do we mobilise the resources not just of all the key agencies but also the wider public services and the public in general to that? And, crucially, how do we operate in an international environment recognising that this is -- and we will talk about cyber but actually even economic crime is very much without international boundaries.

So that is the challenge for us. As to the figures I think many figures get bandied around. I will take $\pounds 27$ billion. Sometimes we should not get hung up on those figures. I think there is a broader issue which goes beyond the pounds, shillings and pence we attach to it. It is about the confidence which we can have in UK institutions and our currency and our financial services sector and our commercial sectors. I think that, whilst more nebulous, is actually a better way to focus. How do we build and retain confidence in what we do? I will park that thought there.

How will we operate? From my perspective, the coordination, the establishment of a task force, the making sure that we can draw together a range of partners with a range of skills and a range of intervention capabilities to have a better effect on economic crime in its broadest sense.

So within that - and I will just touch briefly on cybercrime - cybercrime is a separate command within the NCA however we know, probably, we were talking 40% of fraud was in the cyber domain. I think we are now getting close to 60% or more. How do we deliver upon the response to that analysis giving us a clear victim's view on that? To a large degree, from the national perspective, where can we best intervene and where can we have best effect? For us, that sits around malware development, the distribution of malware and network intrusions. By that that is someone hacking at your system or it is a denial of services tax on businesses. Particularly to large companies, if you take their website down for an hour I am told that there are lots of pound, shillings and pence implications around that.

What is the challenge to us as we focus on those? Two or three. Firstly it is the technical nature of those attacks. These are complex technical attacks. To respond to them we need to have our own range of technical skills and capabilities. As you will know, paying public sector salaries for that, that is a bit of a challenge when there are people in the City and in Canary Wharf who can pay probably four/fives times what we are paying our investigators with those skills. One of the ways we are going around that is the use of Specials so can we use someone's public concern about what can I do to help my community by bringing in those skills. That works quite well.

But we do need to have better engagement with our partners. Three elements on that. Firstly, this has to have an international dimension and we have got particularly good relations with the Federal Bureau of Investigation (FBI), who are at the cutting edge of this with us. There is also

the relationship with business and I will touch on it having been involved in the setting up of the National High Tech Crime Unit a dozen years ago now. One of the challenges we faced there right at the start was the confidence of business to engage with law enforcement. I think we have moved that on a large degree and a significant degree, if I reflect back, but there are still two elements to that. One is about competitive advantage and one is competitive disadvantage. If, for instance, a business has anxieties about reporting to law enforcement because will that go in to the criminal justice arena, will that information not be handled in the correct way, we do not get the reporting we need. Secondly, as we seek to build closer partnerships with the private sector in particular, and we are looking for in beds from whether it is the banking sector, whether it is the commercial sector. Is that procedure giving commercial advantage to a particular business organisation? That is where some of the umbrella organisations had some value.

But undoubtedly the way forward on this is greater technical capability. Stuart quoted something I said at a previous meeting which is, actually, 90% of this you can probably resolve if you have got proper discipline around your use of the internet but, equally, this is not something we can do as a national agency alone. We have to work with the others in law enforcement and, indeed, the broader sectors, but this is about partnership and it is about building confidence and trust in that.

Stephen Greenhalgh (Chair): Thank you. On the note of partnership I will move on to another partner. Perhaps, Commander Head, you could fill in how it works in London and what role the City Police plays on economic crime and dealing with cyber fraud?

Commander Steve Head (City of London Police): Certainly, Chair. For those people who do not know the City of London Police are the national lead police service for certain aspects of fraud and also for cyber reporting. If you were to look at the pillars that that is built on one aspect of it is there are some operational teams based in the City of London. They do an awful lot of work with the NCA that Trevor's just spoken about, and they do large national jobs and those sort of international jobs working with partner agencies. There is around about 300 of those ongoing at the moment. They also have a Fraud Academy which is a little bit about trying to educate people in to the latest developments around fraud and a big part of that is the cyber enabled fraud. That Academy works from there as well.

Also the National Fraud Intelligence Bureau is an intelligence bureau that holds round about 8 million records at the moment, and growing. That is fed by a number of databases, one of which is Action Fraud, which is owned by the National Fraud Agency, now part of the Home Office, and it is certainly our ambition and our aim to bring the Action Fraud, which is effectively a call centre and a web reporting, closer to the NFIB, and we have plans about how those can be amalgamated. I know that there are questions about how they can work far better together.

Stephen Greenhalgh (Chair): That seems positive in bringing things together.

Commander Steve Head (City of London Police): One of the things that we have done in terms of what we have seen around fraud - and I would agree with the comments that have been made here - this is an issue with the growth of fraud. Last year we saw 230,000 approximate reports which was an increase of about 27% on the year before, over 50% on the year before that, and we are likely to see a growth again this year. Trevor rightly said that we have seen a growth in terms of the cyber enabled elements of those. I think Trevor mentioned 60%. We believe that is now over 60% and we can see how quickly that element is growing.

Stephen Greenhalgh (Chair): Wow. So fraud is growing massively and cyber, as a proportion of fraud, is growing exponentially.

Commander Steve Head (City of London Police): We think that the increase that can be broken down in to three distinct parts. One of them is in actual fact we have seen a switch from other kinds of criminality and I think one of the speakers earlier talked about why would you go and do shoplifting when you can do it online, and we have seen that switch. We have also seen a growth in people's expectations where people have actually started to report fraud. One of the reasons why Action Fraud was introduced by the NFA was because people around the country found it very difficult to report fraud in the past. The other thing we have seen is that we believe that the emergent technologies have meant that people have been targeted from other people where they would not have been able to be targeted before. It goes back to Trevor's point about the international dimension of this.

Stephen Greenhalgh (Chair): Sure. It is a borderless crime.

Commander Steve Head (City of London Police): So we see a combination of those three things that has led to that rise. What that has meant, and I think we need to accept it as policing, is that the systems that we had in place needed to be redesigned about how we allocate crime, how we look at it. I think it was Simon who spoke earlier about the idea of if you have a network of victims that are spread right across the country, if you have a kind of crime where it is very difficult to say that that is the geographic locus because it has happened on the internet, the answer to that is to look at where the criminality is emanating from. Crimes are now disseminated out based on the principle of where the offenders are based and where crimes are most likely to be solved. That has been a switch for policing. I think it is a very positive switch. I think other elements will move to this because it is not just fraud where the new technologies are impacting upon, albeit that has really been at the vanguard of where we are in those things.

Stephen Greenhalgh (Chair): If I put the central concern from the people that we have heard from, businesses we have heard from today, around the lack of a sense of response towards, effectively, catching the fraudsters, do you recognise that? Certainly when I went to my day of being educated by the City it seemed like there was a massive sieve of these 230,000 reports came in at the top, then there was an extremely complicated algorithm I have never quite

understood that meant that most of them did not go anywhere, and then some of them got put to a local force that was better able to catch the fraudster but they were not necessarily picked up. So there is a lot of hand offs and missing bits that mean that actually not a lot is followed up. There is a lot, I know, being done to disrupt and take down websites, which is all very, very good, but the actual capturing of the money launderers and other engines of fraud, it seems more could be done. That is what is being stated by Next where they want to pay for a policing response.

Commander Steve Head (City of London Police): Absolutely. We disseminate crimes out, as you see, or crime packages out. I think it is really important that we differentiate between individual crimes that come in but are then put together as packages, or networks, and they are then sent out to forces, and we have seen that. We have seen a rise in the number of crimes that have been disseminated and we have seen a rise in the number of crimes that are being dealt with by forces and we welcome the MPS' acknowledgement that they are going to do a lot more around trying to create a team to deal with this. We have worked with the MPS to try to develop that.

In terms of October's figures, which are the last complete set of figures that I have, Chair, is that in actual fact, of the crimes that came in, there were 19,000, of which 3,500 --

Stephen Greenhalgh (Chair): Take it slowly because we will all write this down you see. 19.000 came in in October.

Commander Steve Head (City of London Police): Absolutely.

Stephen Greenhalgh (Chair): This is fraud basically?

Commander Steve Head (City of London Police): Yes, absolutely. Fraud. 3,500 packages were disseminated. They will equate, not all of them, to one crime. Some of them will equate to many crimes. I think the biggest we have seen in the MPS at the moment is one package equating to 800 victims with a loss of £10 million. That was also supported by about --

Stephen Greenhalgh (Chair): How many millions?

Commander Steve Head (City of London Police): That was £10 million for that one case. Also supported by 13,000 disruptions within the NFIB.

Stephen Greenhalgh (Chair): How many fraudsters caught?

Commander Steve Head (City of London Police): In actual fact, in terms of the MPS' returns, the MPS' returns were up by 1% in terms of the previous --



Stephen Greenhalgh (Chair): So how many fraudsters were caught? You have got 3,500 packages, 19,000 cases of fraud, how many fraudsters were caught?

Commander Steve Head (City of London Police): I think the MPS returned, at that stage, a detection of about 5%.

Stephen Greenhalgh (Chair): That could be a sanction detection?

Commander Steve Head (City of London Police): That would be what we would call a detected outcome. Now that could be any result from that. What I would say is that, in actual fact, that would not reflect the ongoing nature of --

Stephen Greenhalgh (Chair): That is against an average - because I have been watching the telly over the weekend - of 21% or 22% for the MPS against a national average of 6% for all crimes.

So, look, I can see the Deputy Commissioner bursting to ...! Where are we today and what is the future looking like in terms of dealing with the real serious issue around cyber fraud for London's citizens and businesses?

Deputy Commissioner Craig Mackey (MPS): Right. I think there is a good acknowledgement of where we are at the moment. We would absolutely endorse that in terms of the capacity and capability. We have spoken in a number of places around there is a growth of our neighbourhood, a high street, which at the moment does not have enough police on it. That growth in that high street is the internet. It does not have the presence -- and you have heard me say this a number of times in other places, Deputy Mayor. The reality for a number of people in London they are probably more vulnerable in their back room doing their internet based activity than they are on the streets of London. We have driven hard around public place crime, violent crime in a public place and those sorts of things. That is not to be complacent. We absolutely have work to do. But there is a whole new area of criminality and colleagues have talked about some of the things that drive around this. Why would you rush over the pavement with a gun when you can do something on the internet and probably get the same things and not have the same judicial outcome even if you are caught? So I think there is a wider debate for all of us in terms of where we go. I think we also need to have that debate as well, as citizens in London, around some of these challenges. So the message that came over, 90% of this could be prevented if businesses used just the modern virus and software, I am sure the same would apply for citizens. So we have got to keep that coming.

But we are conscious we also need to do something quite different in terms of the work, and some colleagues will have seen the work we have announced this week around the cyber and fraud team in terms of growing our capacity around doing that. The debate we are having is where do we take those resources from? Because they are the same people we want at 3am in Camden. They are the same people we want in Westminster. They have got to come from

somewhere. So we have got to make some hard choices in terms of where we take those resources to grow them.

There is then something around the skills of those resources and what we need. We have also got to be clear -- because I think, as Trevor and other colleagues said, this is a wide spectrum from the individual member of the public who has been defrauded on anything from a dating site to selling a car to someone getting abuse on Twitter or Instagram through to the sorts of high level frauds we have talked about here that affect businesses and industry. We have got to be clear about which bits of those we can actually make real progress with and which bits of those will take longer to solve. Because I think, as colleagues have said, the volume of stuff coming in far exceeds the capacity to do it. And as you know -- we have had some other debates elsewhere around actually there is some stuff at strategic level we need to do across government departments and elsewhere about tidying up some of the legislative framework because we struggle in to some quite difficult areas of jurisdiction when you deal with some of the complex frauds that go beyond UK boundaries.

But the good news is that actually, in terms of putting resource to it, absolutely recognise a commitment to do that and early in the New Year you will see some of the detailed announcements about what are those resources around doing it to give us a step change in capacity and capability to address this issue for the people of London.

Stephen Greenhalgh (Chair): That is incredibly welcome. Welcome that you recognise that the MPS needs to step up to the plate, obviously working with policing colleagues, and that is the first step to making any kind of progress. We recognise there is only a finite amount of resource but that is incredibly good news and we are very, very pleased to hear the announcement of the (inaudible) of that new capability.

Deputy Commissioner Craig Mackey (MPS): I think everyone can help, and I think today helps this, because it is important we have an informed debate around threat. Because at the moment the entire debate around policing is how many visible bobbies are there on a street corner and we actually need to say that some of these challenges require a different type of approach. So it is really important that we are clear about why we are doing these things.

Stephen Greenhalgh (Chair): Yes. Sorry.

Jeremy Mayhew (MOPAC Challenge Member): I just wanted to pursue a little bit more about the state of development on the cyber fraud teams. Recognition welcome. But are you saying - and forgive me if I am suggesting you are not as far down the road as you might be - resources, skills, existence, not yet settled. Is there a timeframe --

Deputy Commissioner Craig Mackey (MPS): No, no, there is a time --



Jeremy Mayhew (MOPAC Challenge Member): You said you would announce something in the New Year but is there any agreement about its character, size --

Deputy Commissioner Craig Mackey (MPS): Yes. In terms of the existing numbers and resources. There is capacity already with some of our specialist teams. It is around bringing some of that together but it is going to need new resources above that and we need to work out where they come from in the organisation.

Jeremy Mayhew (MOPAC Challenge Member): Do you know how much you need?

Deputy Commissioner Craig Mackey (MPS): Well probably in the order of hundreds.

Jeremy Mayhew (MOPAC Challenge Member): But it is work in progress rather than settled --

Deputy Commissioner Craig Mackey (MPS): Absolutely. Because at the moment there will be some hard choices about where they come from. Because they are going to have to come from existing resources.

Jeremy Mayhew (MOPAC Challenge Member): But you are committed to having a view by the New Year?

Deputy Commissioner Craig Mackey (MPS): We are committed to announcing the numbers by the New Year. We have got existing resources that do this. There are areas of both specialist commands that already do some of this work so there is specialist high end fraud work, there is some specialist work in particular crimes that affect some of the businesses here but not all of them, but actually brigading together, but it is growing new capacity around it. We do some of this work in our counter terrorism work as well. So it is being clear about where we get this capacity from and being really clear on those numbers. Because there will be difficult debates because people will lose resource.

Jeremy Mayhew (MOPAC Challenge Member): Can I ask a couple of other quick questions? We have had quite a lot of discussion about the increase in the number of reported crimes but certainly in our briefing we were told - and I think we have heard it a bit from, so to speak, this side of the room - that actually reporting both by big companies but also, even more perhaps, by smaller companies, is not as easy. So actually the increase in reporting may not actually reflect the increase in activity. I do not mind who answers this. Who is addressing the issue of how one makes it easier for businesses to report cybercrime?

Commander Steve Head (City of London Police): I can answer that. I fully accept, and have publicly fully accepted, that in actual fact this is not the full rise in terms of the figures and we are aware that business in itself does not report a lot of fraud, particularly cyber enabled fraud.



Alison Parkinson (Directory Security Manager, Next): That is right. Absolutely right.

Commander Steve Head (City of London Police): In actual fact that is because the systems, as they exist at the moment, are not necessarily designed for the bulk reporting of crime in that fashion.

Jeremy Mayhew (MOPAC Challenge Member): I am getting nods.

Alison Parkinson (Directory Security Manager, Next): Steve is absolutely right. It is not fit for purpose at the moment, especially for businesses.

Commander Steve Head (City of London Police): I would actually pay tribute to the NFA who created Action Fraud for being able to create a system of national reporting which has been largely geared towards individuals and very small businesses. In actual fact I think that was a big step forward for individuals in every sense and part of the reason why we are having these debates is because these rises have happened. We now need to take that to the next step and there are a number of things happening to try and make it easier for businesses.

Jeremy Mayhew (MOPAC Challenge Member): Are you working with business to work out how you make your systems more reporter friendly, so to speak?

Commander Steve Head (City of London Police): We are --

Jeremy Mayhew (MOPAC Challenge Member): Because what I am hearing is that the systems are not very user friendly.

Commander Steve Head (City of London Police): There are two things I would pick up on that, if I could. The City of London Police are keen to take over Action Fraud and, as part of that process, we are having a series of workshops with forces such as the MPS but also with industry themselves where we would redefine the system from beginning to end so in actual fact it is one seamless system.

Jeremy Mayhew (MOPAC Challenge Member): Working with business?

Commander Steve Head (City of London Police): Absolutely. Quickly to give you some timescales because I know that you are interested in timescales and other things. There has already been an enhancement to the system where you can now download 150 crimes at a time. We know that that is not good enough for big businesses in actual fact but that was a significant --

Stephen Greenhalgh (Chair): I think we are not going to solve it but we recognise that there is -- where you have come from, which I think is helpful. It is good to have a system where you

can report it in. Where you need to get to. Of course you are working with business but Rome was not built in a day, we are going to get there. I think what would be helpful is to get a picture of when Rome will be built!

Alison Parkinson (Directory Security Manager, Next): I do not think it is just when Rome will be built. The big concern from the retailers is they are reporting, all those that are reporting, it is the level that then gets disseminated to the MPS that is then investigated. Because those forces --

Stephen Greenhalgh (Chair): This is the central point you made.

Alison Parkinson (Directory Security Manager, Next): -- just keep coming back and back and --

Stephen Greenhalgh (Chair): Clearly it is not just about reporting --

Alison Parkinson (Directory Security Manager, Next): -- the impact is on business.

Stephen Greenhalgh (Chair): It is not just about the reporting and recording of crime.

Alison Parkinson (Directory Security Manager, Next): No, it is not. Absolutely.

Stephen Greenhalgh (Chair): And you are now leading to the peroration to the launch of the Business Crime Strategy consultation which picks up specifically that central point. Jonathan?

Jonathon Glanz (MOPAC Challenge Member): Just really to pick up on getting the message out there, whether it is to businesses or to individuals that are affected by cybercrime. Because it is so difficult to identify the geographical location of the perpetrators and the offenders it must also be very difficult, from a MPS' perspective, to look at how you allocate resource to this and whether or not you should be looking at national campaigns, funded either through national government or through cooperation between forces, to funnel this information in a more effective way and to get the messages out there. That could be things like TV advertising or getting it up through cooperation with retailers who have national coverage to ensure that this information flow which enables you, as I understand it, to help to identify the perpetrators by looking at these patterns, is more effectively communicated to people who are likely to be affected. Because that figure of about 90% of these crimes being capable of being detected by proprietary anti-virus software I think is something which needs to be opened up to a far wider group of people. I certainly follow this debate. I was not aware of that particular statistic but clearly getting that out there, getting people to update their software, has got to be one of the most cost effective ways of dealing with some of these large volumes of crime.



Commander Steve Head (City of London Police): There is going to be a national campaign in January led by the Home Office which, in actual fact, will be all of those things that you have just described in terms of the national picture and it will be looking at --

Stephen Greenhalgh (Chair): You say it will be a national campaign from the Home Office?

Commander Steve Head (City of London Police): Yes, that is right. I think it is a team that Charles Frar(?) leads and --

Stephen Greenhalgh (Chair): So that is going to work then.

Commander Steve Head (City of London Police): It is looking at online crime. It is looking at the kinds of people targeted online and in what way they are targeted and puts out prevention advice in that sense.

Stephen Greenhalgh (Chair): Okay. I think we have had a very good go at this and it is very broad. I actually want to thank everybody for coming and spending time. Really today was about framing the issue, hearing some of the concerns from businesses, repeated involvement bringing businesses together, ensuring places are kept safe but providing particular capabilities to people who have experience of designing out crime and also hearing from policing about the response to what is a considerable issue.

But also it was MOPAC's day to launch our consultation for the first Business Crime Strategy for London so it is, I think, quite a historic day. I know Robert Hall is in the audience somewhere. Are you still here, Robert, or have you disappeared? Robert, it pains me to say you had a major impact on the structure of this strategy because we have now moved to the four Ps that you were advocating which says that we do, even though we pretend not to listen, we do listen to good advice from London First. Very much that this is around the anchor point of the four Ps to prevent, to prepare, to protect and to pursue.

There are some clear objectives in the strategy that, first of all, pick up that point about the need to prevent this. I think it is the point that comes from the FSB that 90% of these issues can be prevented and we need to do something around awareness. I think, frankly, I cannot outsource that to the Home Office or BIDs. When it comes to London, with the Mayor's mandate, we care about the jobs and growth in the city. The whole mission for the Mayoral team in the second term is to drive jobs and growth. The public safety piece as the foundation stone for that is well acknowledged by all of you and we want to play our part in ensuring that London's businesses take the steps that they can take, and they are aware of the steps they can take, to prevent this kind of crime. So we would like to join forces, whatever is out there, so that we add value to that campaign.

Very keen to pick up on whatever piloting we can do because marketing this and being heard is actually quite difficult. Preparing the message is all very well but getting it out there,



particularly to all businesses - enormous, medium, small - that is a real challenge, particularly in a place like London, and we want to join that challenge.

Also the points that Steve Head is raising. I do not think this can just be held by Whitehall frankly. This is something that certainly the City and also local government have to play their part. Patterns of crime require that and we all play our part in making businesses aware.

The second thing is that the strategy is about building confidence that we have got a place where crime will be investigated, and we want to build that confidence that businesses come forward, share intelligence, report, and that is a major objective of our Business Crime Strategy.

The third one, which I wrote. What was the third one? Team, just remind me, it is in here somewhere. Give me a second I have lost the sheet of paper which had it. Those were the two obvious ones. Yes. It comes down to investigation. We do not like setting targets. We have set a general target around sanction detections for all crime but we want to see — it comes to really when I was saying how many fraudsters have we caught? We want to see more crime solved. The greatest deterrent, after confidence, of business in playing their part, and particularly in policing's response and the wider criminal justice system, is that we solve more crime and we want to see more crime — that is not percentages. Actual more crime. Given the huge amount of crime in this particular area we want to see more crimes solved. I think that is really a challenge that we would have for policing. You come together and — frankly, we are not a soft touch. London is not a soft touch. Go to somewhere else. Do not try London because you are going to get caught. That is the message that we want for the fraudsters out there. Where are they from? Eastern Europe sometimes and the rest of the world. "Do not come to London to commit fraud. We will catch you". That is the message we want from all our agencies.

So please, please, all of you that have come here with all your experience. This is not the last word, it is the first word, on the consultation. We want London's first Business Crime Strategy to capture all your expertise and really make a difference in ensuring that this is a great place to drive jobs and growth and continues to fund, frankly, the rest of the UK's economy. That is the role of London.

Thank you very much for coming this morning. Thank you, all of you, for making this such an interesting and valuable session. Thank you.