

IFED Referral Process and Scoring Criteria

November 2021



Guildhall Yard East
London
EC2V 5AE

Phone: 020 7164 8200
Email: ifedreferrals@cityoflondon.pnn.police.uk

Foreword

The Insurance Fraud Enforcement Department (IFED) was set up in 2012. It is a bespoke unit within the City of London Police dedicated to combatting insurance fraud.

IFED is funded by the insurance industry via the Association of British Insurers (ABI) and has a national remit, investigating insurance fraud throughout England and Wales.

The unit comprises of four operational teams made up of Detective Constables and Financial Investigators and managed by a Detective Sergeant. Each team deals with a high number of investigations, using both traditional policing methods as well as proactive and disruptive tactics to fight insurance fraud.

A fifth team - the IFED Hub - consists of a Detective Sergeant, a Senior Analyst and Police Staff who provide intelligence analysis and research as well as administrative support to the department and industry.



DCI Edelle Michaels

Since its inception IFED has arrested and interviewed over 2,700 suspects and secured over 1000 convictions and cautions, recovering assets worth almost £3 million. In addition, IFED plays a key role in preventing and deterring fraud through stakeholder engagement, campaigns or one to one liaison with industry members, highlighting areas in which fraud can be identified and deterred before it begins.

IFED accepts crime referrals from insurers as well as from third parties, such as the Insurance Fraud Bureau (IFB). In addition, the unit maintains links with other forces and Regional Organised Crime Units (ROCU) throughout the United Kingdom, as well as Government agencies and other parties to continually build and develop intelligence.

If you have any further queries, please contact us via 020 7164 8200 or ifedreferrals@cityoflondon.police.uk where we will provide any further support and guidance that you may require.

Detective Chief Inspector Edelle Michaels
Head of the Insurance Fraud Enforcement Department

Introduction

The IFED scoring matrix is led by the threats identified as pertinent to the industry in the Insurance Fraud Bureau’s Strategic Threat Assessment (STA). The matrix also takes into account threat/harm/risk and vulnerability issues, as well as opportunities to target Organised Crime Groups (OCG) and professional enablers. Refinements in 2021 include a specific section to assess 'Ghostbroker' referrals to ensure they are scored consistently and appropriately.

Each crime referral is assessed individually and provides IFED with an overall score, which determines whether it should be accepted or referred back to industry with feedback.

All standard referrals are discussed in a weekly operations meeting, which includes representatives from the IFED Hub, Operational Teams and IFED Management. Urgent referrals are discussed immediately upon receipt into the unit.

Should a case not be taken on by the unit but there is an appropriate rationale for asking IFED to review this decision, an escalation (appeals) process has now been formalised.

If you want to discuss any potential referrals or you have any further queries regarding referrals, please do not hesitate to contact the IFED Hub on: **020 7164 8200** or email: ifedreferrals@cityoflondon.police.uk

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The Referral Process

An Action Fraud report should be completed prior to sending us the referral, referencing the NFRC number within the IFED referral form.

The referrals should be sent to ifedreferrals@cityoflondon.police.uk

The information within the referral document is then entered on to Niche (CoLP's crime reporting system) and allocated a crime reference number.

The referral is then assessed and scored against the IFED Scoring Matrix. When a case is accepted, we will email you within 10 days informing you of the decision. If a case is rejected, the SPOC will receive a phone call and email from the IFED Hub explaining the decision.

Statements and exhibits will be requested by the investigating officer (Officer in Case—OIC) who will set a time period for supplying the statements and exhibits.

As always, any cases that you consider urgent can be discussed/referred over the telephone. Requests of this nature may include, but are not limited to:

- Evidence is likely to be lost without immediate police action
- Suspects have been alerted and may seek to flee the United Kingdom and/or destroy key evidence
- Imminent risk to public safety
- Significant financial loss is likely without intervention

Forms available at: [Make a referral | City of London Police](#)

The IFED Scoring Matrix

The Matrix is designed to reduce subjectivity, thereby ensuring that the acceptance criteria is consistent and transparent to those submitting crime referrals to IFED. There are 6 key areas IFED assess in a referral, each with a number of sub headings:

1. Seriousness of the Fraud

- Threats identified in Strategic Threat Assessment (STA)
- CoLP's National Lead Force Priorities
 - i. Bring offenders to justice and disrupt organised crime
 - ii. Identify and divert individuals at risk of offending or reoffending
 - iii. Reduce harm and prevent victimisation
- PIP Level – an assessment of the overall complexity of the referral, [Introduction \(college.police.uk\)](https://college.police.uk)

2. Evidential Assessment

- Age of the offending – when did the offence occur?
- Evidence of offending – allegation supported by available/obtainable evidence?

3. Offender Assessment

- Named Suspect – has the suspect been identified already?

- Scale – single opportunistic suspect, OCG, Professional Enablers, etc

4. Victim Assessment

- Type – Insurers, members of the public, vulnerable persons, etc
- Community Impact
- Number of Victims

5. Harm/Impact to Victims

- Public Risk:
 - i. Ongoing risk to the public – e.g. active crash for cash gang
 - ii. Significant potential risk – e.g. induced collisions reported, likely to reoccur
 - iii. Low potential risk – e.g. low speed collisions, ghost brokers leaving people uninsured, etc
 - iv. No risk to the public – no ongoing criminality and only loss was financial and unlikely to reoccur
- Financial gain or loss – including looking at the possible financial impact
- Reputational Damage – for both referring agency and the City of London Police. Is there likely to be serious reputational damage if action is not taken/is taken

6. Ghost Brokers

- Methodology used:
 - i. Documents being altered or created
 - ii. Stolen card details - with identifiable victims
 - iii. Use of charity bank accounts
 - iv. Links to other criminality
- Scale of offending

The Matrix also takes in to account the potential for opportunities for us to find positive, alternative means to resolve referrals where a protracted investigation is not appropriate. These include but are not limited to:

- Account Freezing Orders
- Operation Mirage (website/social media take downs)
- Organisational/Industry learning points to prevent similar crimes occurring
- Cease and Desist

Additional flags are in place to highlight other factors such as, ongoing civil litigation and other law enforcement/government agency involvement.

Escalation Process

Some crime referrals may require a further and higher review to ensure IFED provides a trusted and effective service for our stakeholders.

Appendix B – Escalation Process shows the formalised route to escalate a case that has been rejected by the unit.

Operation Mirage (Disruptions)

Operation Mirage has been created by IFED to assist in combatting emerging online threats to the insurance industry.

The aims are to disrupt the advertising and sale of fraudulently obtained insurance policies and to protect the rights of ABI's members when they are being criminally infringed upon. This will create a safer environment for consumers to shop online without purchasing counterfeit or illegitimate policies within the UK branded online marketplace.

All Cyber enabled offences will be considered where there is a clear and unambiguous breach of the law and a website/telecommunications/social media profile take down would prove beneficial and prevent further offences. These cases include instances which would not normally result in a referral to IFED.

A streamlined referral system has been formalised – see Appendix D.

Contacts

IFED Hub:

Telephone: 020 7164 8200

Email: ifedreferrals@cityoflondon.police.uk

Address: IFED

Guildhall Yard East

London

EC2V 5AE

Website: www.cityoflondon.police.uk/ifed

IFED Operation Mirage (Disruptions):

OpMirage@cityoflondon.police.uk

Action Fraud:

Telephone: 0300 123 2040

Website: www.actionfraud.police.uk

Association of British Insurers (ABI):

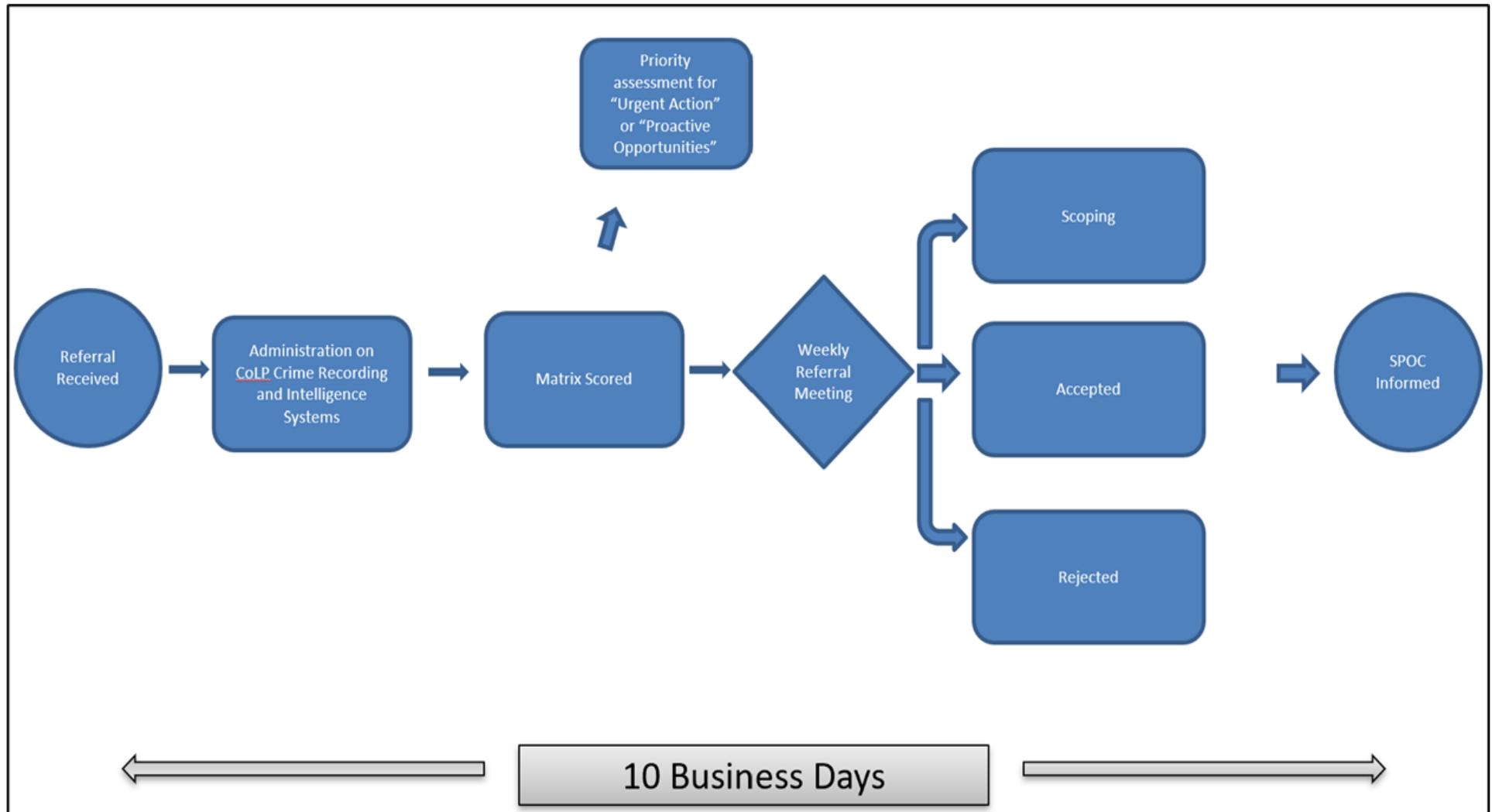
Website: www.abi.org.uk

Insurance Fraud Bureau (IFB):

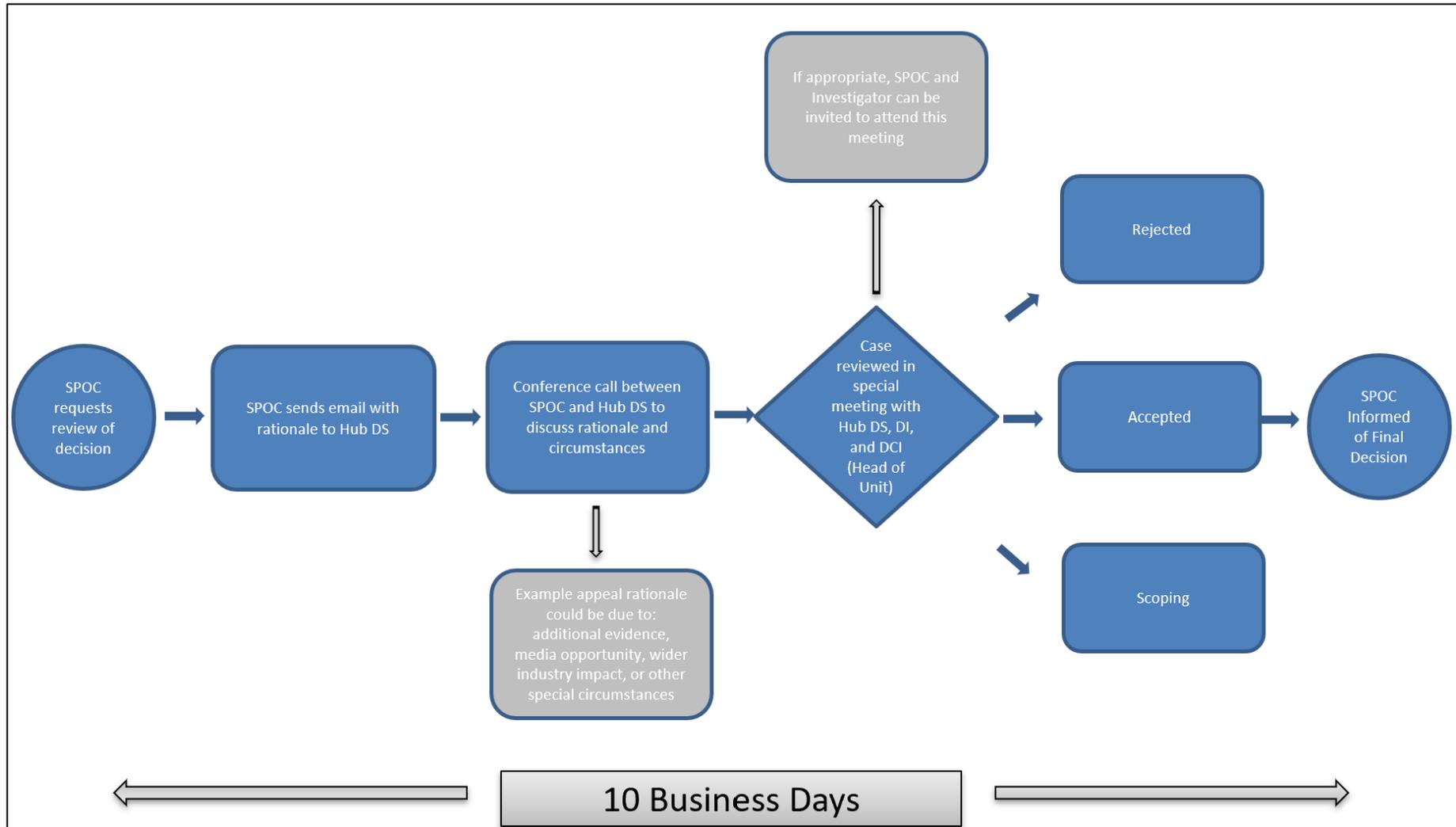
Cheatline: 0800 422 0421

Website: www.insurancefraudbureau.org

Appendix A - Referral Flowchart



Appendix B - Escalation Flowchart



Appendix C – Referral Form



Please ensure that all details are completed in full, irrespective of the presence of additional documentation and emailed to IFEDReferrals@city-of-london.pnn.police.uk

If all required information is not submitted, IFED will return the form to the SPoC to complete and re-send.

IFED will send an e-receipt within two working days of receiving a referral. If a referred case meets the IFED acceptance criteria, the SPOC will be notified within 14 days. All documentary evidence to be supplied to IFED within 28 days of notification of acceptance.

Advice concerning any prospective referral can be obtained from the IFED Hub, by calling 0207 164 8200, between the hours of 9am to 5pm. Any referral requiring urgent (same day action), should be reported to the City of London Police switchboard on 020 7601 2222.

IFED Referral No:		
NICHE Occurrence:		
Referrers Details:		
Referring organisation:		
Organisation Address:		
SPOC's details:	Name:	
	Telephone Number:	
	Email Address:	
Referrer's reference:		
Investigator Details:	Name:	
	Telephone Number:	
	Email Address:	
Date of referral to IFED:	Click here to enter a date.	

Action Fraud reference:	NFRC
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Case Summary:

1	Crime Committed Date:	Please indicate between dates Click here to enter a date. To Click here to enter a date.	
2	Insurance Type:	<input type="checkbox"/> Personal Insurance	<input checked="" type="checkbox"/> Commercial Insurance
3	Produce Line:	Choose an item.	
4	Threat Type:	Motor Claims:	Choose an item.
		Motor Policy:	Choose an item.
		Property Claims:	Choose an item.
		Liability Claims:	Choose an item.
		Other:	Choose an Item.
5	Professional Enabler:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
		Type:	
		Summary of Involvement:	
6	Value of Fraud:	Value Paid:	£
		Estimated Value:	£
		Total Reserved:	£
7	Summary of Fraud:	Please provide a short synopsis of the offence(s), including sufficient detail to allow the reader to fully understand the case.	

Further Case Details:

8	Investigations Undertaken:	What steps have been taken to investigate?		
9	Evidence Type:	<input type="checkbox"/> Document/s	<input type="checkbox"/> Statement/s	<input type="checkbox"/> CCTV / Dash cam
		<input type="checkbox"/> Phone Recordings	<input type="checkbox"/> Social Media	<input type="checkbox"/> Surveillance
10	Civil Litigation:	Please enter the status of any civil litigation		
11	Payments:	For all payments made, please detail payment method, account details and dates		
12	Linked Intelligence:	Details of any confirmed linked intelligence (including any other criminality)		
13	Law Enforcement Involvement:	<input type="checkbox"/> Yes		<input type="checkbox"/> No
		Force Name:		
		Crime Reference:		
		Summary of involvement:		
14	3rd Party Material:	<input type="checkbox"/> Insurer	<input type="checkbox"/> Solicitor	<input type="checkbox"/> Other
		Do we have authority to contact the solicitor or investigator directly?		
		Company Name:		
		Name:		
		Telephone Number:		
		Email Address:		

Suspect Details:

15	Suspect Details	Name:	
		Date of Birth:	Click here to enter a date.
		Address:	
		Telephone Number:	
		Email Address:	
		Other Information:	
16	Suspect Details:	Name:	
		Date of Birth:	Click here to enter a date.
		Address:	
		Telephone Number:	
		Email Address:	
		Other Information:	
17	Suspect Details:	Name:	
		Date of Birth:	Click here to enter a date.
		Address:	
		Telephone Number:	
		Email Address:	
		Other Information:	
18	Suspect Details:	Name:	
		Date of Birth:	Click here to enter a date.
		Address:	
		Telephone Number:	
		Email Address:	
		Other Information:	
19	Suspect Details:	Name:	
		Date of Birth:	Click here to enter a date.
		Address:	
		Telephone Number:	
		Email Address:	
		Other Information:	

Appendix D – Op Mirage Referral Form

This form is only to be submitted where an online disruption could be used to prevent further offences. Submission of this form does not prevent a later referral for investigation being made.

Please ensure that all details are completed in full, irrespective of the presence of additional documentation and emailed to OpMirage@cityoflondon.police.uk

Please attached any supporting Screenshots or addition information to the email.

Advice concerning any prospective referral can be obtained by emailing Op Mirage or calling 07565011930 during office hours.

Referrers Details:

Referring organisation:		
Organisation Address:		
Referrer's details:	Name:	
	Telephone Number:	
	Email address:	
Referrer's reference:		
Date of referral to IFED:		
Action Fraud reference:		

Case Summary:

1	Entity Type/s:	
2	Entity Identifier/s: (if online Social Media please include full URL)	
4	Summary of Information: (please include offences, dates, value of fraud, how the entity is involved and suspect details if known)	