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# Public and Private Policing of Financial Crimes: the Struggle for Co-ordination

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**Purpose:**

The purpose of doing this is to move our attention, both theoretically and empirically, away from looking solely at the police as deliverers of “policing” and more in the direction of the web of police, non-police agencies (like financial regulators and departmental investigators in the UK), global and local private interveners (like payment card systems, banks, and insurance companies).

**Design/Methodology/Approach:**

Interviews with high officials and operational public and private sector personnel, principally in the UK but also in continental Europe, North America and Australasia.

**Findings:**

This paper deals with the evolving shape of the control of financial crimes, especially frauds. Most policing activity in the area of UK public sector fraud is undertaken not by the police but by departmental investigators; most frauds against business come to the attention of the police via corporate actors; while frauds against the public may be reported direct, or via intermediaries like credit card issuers. It is difficult for public sector bodies to escape their narrow departmental orientations in developing “joint working” in public-public partnerships. Public-private partnerships have been developing rapidly in dealing with volume frauds such as payment card and insurance frauds, but less rapidly in more elite white-collar crime areas such as management fraud, which are less predictable and where elites resist accountability.

**Practical implications:**

It is misconceived to look only at public police activity when assessing the scope and impact of fraud control. The research shows that considerable efforts are made by the police and different parts of the public and the private sector in the UK to harmonise intelligence, but scarcity of investigative resources means that both the private and public sectors are frustrated in getting action on their intelligence products.

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**Keywords:** fraud, white-collar crime, economic crime, public-private partnerships, policing





## 1 INTRODUCTION

“Fraud” is a deceptively simple term that covers a very broad and complex set of activities, involving very mixed sets of offenders (insiders, outsiders, and collusive/pressurised relationships such as that with “organised crime”; the whole spectrum of ethnicities and nationalities) and sets of victims (powerful corporations and governments; recently retired people with pension payments; young people buying international rock gig tickets; and people of all ages buying tickets for the Olympic Games and the World Cup, or buying anything with a debit or credit card). Fraud is economically and socially important (Levi & Burrows, 2008), yet many frauds are neglected in many developed and developing countries both by law enforcement and by politicians. Corruption often involves fraud (for example in falsifying accounting documents and violating fiduciary obligations to employers) but raises some different issues depending on whether it is Grand or Petit corruption. In addition to the international aspects of fraud, corruption and money-laundering that create the need for cross-jurisdictional legal frameworks and practical cooperation, fraudsters’ abilities to cross departmental public and public-private boundaries in every society – which goes way beyond “policing by the police” – create complexities for a coordinated coherent control approach, which we explore in this article, as well as elsewhere in the study of criminal networks (Levi, 2008). The form these relationships take is a product of the administrative organisation of the state, of the nature of the economy (on a spectrum from largely state-owned to largely privately-owned) and of state-subsidised or encouraged private welfare. As McIntosh (1975) argued, and as is the premise of later situational opportunity and routine activities “theory”, the organisation of crime is a reflection of the ways in which economies and societies are organised generally, that generate opportunities and controls for crime.

Let us start briefly with the socio-economic impact of fraud in the UK, where the evidence of this impact is most developed, and which forms the backdrop to the policing issues. In 2000 a Home Office-commissioned report estimated the cost of fraud at between £8 and £19 billion (NERA, 2000). In the 2003 UK Threat Assessment issued by the National Criminal Intelligence Service (NCIS, 2003), several types of fraud were listed as among the seven most significant crime threats facing the United Kingdom, alongside firearms and Class A drugs trafficking. In 2006 the Serious Organised Crime Agency (SOCA), which replaced NCIS and other bodies, reported that “fraud constitutes a major threat” (SOCA, 2006: 10). It asserted that fraud was linked to organised crime, and to people and product smuggling, as well as being an integral part of the misuse of the financial services, tax and benefits systems. This was developed in greater detail in the 2008/9 and 2009/10 UK Threat Assessments (SOCA, 2008, 2010).

A research report commissioned by the UK Association of Chief Police Officers (ACPO) which critically assessed evidence on the cost of fraud noted that a minimum of £11.9 billion was lost in direct costs in 2005 – over half of it to the public sector – dwarfing the costs of household and street crime in the UK; and yet nationwide, the police staff specifically designated to fraud investigation is less





than 5% of the total establishment (Levi, Burrows, Fleming, Hopkins, & Matthews, 2007; Levi & Burrows, 2008). This cost estimate has been superseded (though not perhaps using the same methodological criteria for the data) by one from the National Fraud Authority (2010a) of £30.5 billion during 2008. Even in a highly privatised economy such as the UK, public sector losses accounted for 58 per cent of all fraud loss, with estimated fraud losses of £17.6 billion, principally to tax and social security. Fraud in the Financial Services industry is estimated at £3.8 billion, which made it the highest losing industry in the private sector; followed by the consumer goods industry (£1.3 billion) and manufacturing industry (£1 billion). A later strategic threat assessment of identity crime – assisted by this author – identified the cost of broadly defined identity crimes to the UK as £2.7 billion (National Fraud Authority, 2010b). The total Gross Domestic Product for the UK in 2008 was £1.47 billion, so fraud was 2.07 per cent of GDP: a significant figure. It is against this background that the configuration of public and private sector policing should be seen.

However, to focus only on the police is to miss the point that in the UK (though not in many other countries), there are far greater numbers of fraud investigators in non-police governmental than in police agencies (Doig, 2006), as well as in the compliance role in the private sector. Indeed the main responsibility for the prevention, detection, investigation and, in some cases, the criminal prosecution of fraud lies not so much with the general police but with more than fifteen units or organisations within the UK public sector.<sup>1</sup> Many of these are not police units in the conventional sense but are embedded in service provision agencies. This fact colours their resources and their approach to action against fraud.<sup>2</sup> In 2006 a review of responses to fraud conducted on behalf of the UK government noted that there was an apparent mismatch of resources and responsibilities, and this led to the creation in 2008 of what is now the National Fraud Authority, unusually under the superintendence of the Attorney General rather than the Home Office or the Treasury. This article reviews the rhetoric surrounding joint or joined-up working, how this has applied in practice to fraud, and what have been the consequences up the point of these prospective changes.

## 2 RATIONALE AND RHETORIC FOR JOINED UP APPROACHES

Many issues in contemporary serious and organised crime involve multiple departmental as well as private sector interests: examples include cybercrimes; drugs and alcohol abuse; fraud; and money laundering. This applies whatever the country, though the “product mix” varies. One way of approaching this policy problem is to create giant departments – such as the US Department of Homeland

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1 *There are analogies in other countries, such as the US Inspectorates General, but these will not be discussed here.*

2 *For a review of differential approaches to “hidden economy” prosecutions by HM Revenue & Customs and the Department of Work and Pensions, see Public Accounts Committee (2008).*





Security – within which are many sections. One plausible hypothesis is that this largely changes the tensions in the ‘satisficing’ of conflicting interests from inter-departmental to intra-departmental without resolving them. A different approach – taken largely in the UK – is to leave the departments separate but to create cross-cutting interdepartmental committees such as one on “identity crimes” which came into being in 2010. A Performance and Innovations Unit (2000a) report underlined that “simply removing barriers to cross-cutting working is not enough: more needs to be done if crosscutting policy initiatives are to hold their own against purely departmental objectives. There is no simple or standard answer” (ibid.: 5). Achieving this, noted the report, would require a number of problems to be addressed, including narrow departmental focus, the absence of incentives to encourage different ways of working, and the low priority given to cross-cutting working (see ibid.: 92, 94).

Sullivan and Skelcher (2002) identified both individual and organisational components to facilitate working across boundaries. These included committed management who were able to: understand collaborative and partner issues, overcome existing institutional cultures, establish the strategic vision, ensure available resources and capacity, formalise the relationships and criteria for working together, and develop appropriate communications and performance frameworks. (See also Flynn, 2002: 167).

Joined up working is intended to produce better public services by getting departmental and police actors to take a broader view of “the public interest” rather than focusing only on their own sector. In the criminal justice area, Newman (2001) argues that the 1998 Crime and Disorder Act “had at its core a statutory requirement for local authorities and police services to develop strategic partnerships to reduce crime and the public’s fear of crime” (ibid.: 110; see further, Hughes, 2006; Jones, 2007). Especially on local crime and family/sexual violence issues, there has been much transformation in practice as well as in rhetoric (Hughes & Edwards, 2002; Hughes & Rowe, 2007; Maguire & John, 2006; Robinson, 2006). The questions posed here are whether fraud was also suitable area for such an approach, and how would such a joined-up approach be accomplished (and who would be the main drivers of change and resisters to it)?

### **3 FRAUD: AN ISSUE SUITABLE FOR A JOINED-UP APPROACH?**

At the start of the 21<sup>st</sup> century, the issue of fraud had increasingly established itself on a number of agendas (see Fraud Advisory Panel, 1999). Responsibility for addressing fraud was equally dispersed. A review of the concept of the “Fraud Commission” - proposed by Lord Roskill (1986) to monitor the overall performance of the criminal justice system against fraud - concluded that the objectives of different bodies were so diverse and their accountability mechanisms were so fragmented that it was difficult to see how overall supervision could occur (Levi, 2003). Although there was no systematic research that was capable of testing the extent to which fraudsters were generalist (i.e., committing fraud across public and private sector organisational boundaries) or specialist (targeting specific





departments), it was reasonably assumed that some degree of cross-pollination was occurring. This led to the view that more cost-effective fraud work might be achieved through some form of joined-up approach.

In 2000 a report reviewed the cash or shadow or informal economy and recommended joint working where departments - notably the social security and tax agencies - had common interests (Grabiner, 2000). In 2000 a report on organised social security fraud recommended greater *internal* joint working between different units and getting units dispensing social welfare funds to look out for potential fraud (Scampion, 2000). At a case or operational rather than strategic level, there has always been some joint working: data on the same individual or organisation may be held by multiple bodies, and collaboration is needed to access it. In their surveys of police fraud squads in 1998 and 2000, Doig and Levi (2001) noted that the police worked and shared information with over 50 bodies. The Serious Fraud Office [SFO] had (and still has) a set of criteria by which individual police forces report possible cases to the Office which, if accepted, are investigated jointly with the force concerned, using SFO powers which are greater than those of the police. It also participates in wider networks of public and private sector organisations that have joint interests in tackling frauds (NAO, 2003a: 23; author interviews with SFO Director Richard Alderman, March 9, 2010). See also NAO (2003b, 2003c, 2007a, 2007b).

Proposals are sometimes made for one agency to lead on a public policy issue and to foster inter-agency working: for example, the Cabinet Office's Performance and Innovation Unit (2000b) report on recovering the proceeds of crime argued that

the current lack of strategic direction creates an impression that asset recovery is of low priority. It also means that the collaborative efforts of the various agencies involved suffer from a lack of co-ordination at a strategic level...a major weakness in the system caused by the lack of overarching strategy is the absence of streamlined and mutually supportive organisational objectives...

The solution was a lead agency

to ratchet up the performance of the UK's system for identifying and recovering criminal assets by introducing a coherent cross-governmental national Asset Confiscation Strategy to co-ordinate the various arms of the criminal justice system involved...The Director would be accountable to the Home Secretary and ensure that the Asset Confiscation Strategy fed into and supported the aims of the cross-cutting public service agreement for the criminal justice system...

(Performance and Innovation Unit, 2000b, paras 6.11-6.13: 45).

This did lead to quite major changes in legislative powers (the Proceeds of Crime Act 2002), more modest but still significant increases in financial investigation resources (driven by financial incentives in terms of proceeds of crime retention by the police and, latterly, by prosecutors and the courts), and Cabinet-level interdepartmental committees. However, this confiscation work was aimed more at "organised crime" generally (Home Office, 2009) than fraud in particular, and it is difficult to assess what the impact has been on fraud joint working. There is some





evidence that as a result of incentivisation, financial investigation expertise was re-directed from fraud investigation toward more general criminal investigations in pursuit of asset recovery work (Gannon & Doig, 2010).

#### 4 COORDINATING RESPONSES TO FRAUD

The development of joined-up working as a core institutional activity, whether in relation to shared interests or shared involvement in the same area, never appeared to match the political or policy rhetoric. The most significant reason appeared to be the strength of the departmental culture. There were few examples of agencies proactively seeking partners for joined-up working at an organisational level (other than the signing of protocols agreeing to cooperate in general terms). It would appear that the compartmentalised nature of many departments' activities focused the need to address fraud *within* the overall activities and resources of an organisation and within that institution's own organisational development. Indeed, how fraud as an organisational issue is approached is very much a consequence of how the department views its core business. A more detailed discussion is available elsewhere (Doig & Levi, 2009) and is not necessary for this international audience. Suffice it to state that major changes in internal organisation (Department of Work and Pensions) and inter-organisational mergers (HM Revenue & Customs; Serious Organised Crime Agency) preoccupied the bodies and had the unintended effect of reducing the practical scope for working with external bodies. The UK coalition government's enthusiasm for reorganisation and for the creation of a new National Crime Agency (which will include at least the Serious Organised Crime Agency and the UK Borders Agency) and an Economic Crime Agency (which will not include benefit and tax departments but will incorporate some other criminal justice and regulatory organisations) is likely to have similar effects. Change creates its own inefficiencies.

These problems are not new. Then the Director of the Serious Fraud Office, Ros Wright, wrote to the Attorney-General in her letter accompanying the 1999-2000 SFO Annual Report that

it is essential in every SFO case that we are able to rely on the active involvement of the police, working closely with and as part of the SFO case team. My fear then was that this involvement was diminishing. In the past year, the situation has, if anything, deteriorated further. In addition, it is no secret that there is a body of fraud being committed that is outside our criteria which is not being investigated or prosecuted by any agency.

Between then and 2006 (and subsequently), attempts to set up a national fraud squad had been blocked by Chief Constables unwilling to have their budgets top-sliced to pay for it, although the Corporation of London and Home Office had funded a substantial increase in the number of staff in the City of London Police Economic Crime Unit to take on regional responsibilities. It was not surprising that, in 2006, Robert Wardle, Wright's successor at the SFO, should reiterate that declining police resourcing has been a feature of the annual reports...there remains a gap (and one which is uncomfortably wide) between the incidence





of fraud and the number of investigations, let alone prosecutions. Some way needs to be found to ensure that there is adequate resourcing for the investigation of crimes which unjustly enrich some whilst impoverishing others. I am not suggesting the justice gap can be closed – merely narrowed.

Finally, departments were reluctant to take on additional anti-fraud responsibilities that were not on any existing departmental agenda. In 1999 the issue of an organised approach to investigating “gangmasters” – persons and companies that acted as middlemen supplying labour for often seasonal activities like fruit and vegetable or seafood picking - was addressed by the Department for Environment, Food and Rural Affairs (DEFRA). In April 2005 the Gangmasters Licensing Authority came into being: it can refuse licences to or take them away from people suspected of defrauding workers or the government. Neither gangmasters nor illegal migration workers, however, were a new issue: a number of government departments intermittently had had units dealing with this, though there was no political interest to sustain the allocation of resources. Despite the Morecambe Bay disaster, when a number of illegal Chinese migrant workers drowned while picking a seafood called cockles, a House of Commons review remained unconvinced that anyone wanted to “own” the issues or undertake joined-up work on a systematic and longer-term basis. It reported that the Government was unable to “develop an appropriate policy response to a problem, or allocate appropriate resources” because it had taken no steps to “make even a rough estimate of the scale of that problem”. Further it argued that what it had already described as “perfunctory and uncoordinated” enforcement continued, with “insufficiently resourced agencies... held back to an extent by a lack of resources and an absence of coordination” (Environment, Food and Rural Affairs Committee, 2004: 8).

By contrast, the remit of the UK and indeed *any* governmental role in reducing fraud in the private sector is not clear, except to reduce the costs of police investigations (Levi, Bissell, & Richardson, 1991) and, later, to cut off the flow of money from fraud into the ill-defined set of criminal actors known as “organised crime” (Home Office, 2004, 2009; HMIC, 2008). The payment card industry funded a police unit – the Dedicated Cheque and Plastic Crime Unit – to deal with organised payment card and cheque fraud. This was begun as a public-private partnership but after a review showed that the unit saved more money than it cost, the Home Office withdrew its share of the cost, with the unintended effect of making other areas of commerce more reluctant to share responsibilities. In parallel with public sector changes, and consistent with the general UK governmental focus on crime reduction rather than on criminal justice, there developed a set of private sector activities such as:

1. The strengthening of mutual, not for profit bodies such as CIFAS, which sets out some clear criteria for members as to what constitutes fraud, and then shares these data to assist, for example, in vetting all credit applications, with all members, reducing collective risks;
2. Semi-formal industry groups loosely managed by the Metropolitan Police under the banner of Operation Sterling, covering a range of activities such as the travel industry and corporate recruitment/vetting.





3. Efforts by the National Fraud Authority to encourage data sharing and mutual action in private and public sectors.

Technology became one of the key battlegrounds on which private sector volume fraud – though less so elite fraud – was fought. This included

- Data pooling/analysis of all UK motor accident claims in “crash for cash” insurance fraud
- Data sharing to cut fraudulent credit applications
- Identification of fraudulent merchants
- Chip + PIN to make card counterfeiting harder and less profitable
- On-line cardholder and address verification reduces non-face to face impersonation fraud

The overall trend was to close down opportunity when fraud signs appear. This was paralleled in the public sector, with the National Fraud Initiative data-matching all datasets of payments by local government for inconsistencies that indicated fraud, leading to major reductions in fraud levels and opportunities (Audit Commission, 2010). On other political grounds, the new coalition government announced the abolition of the Audit Commission in 2010, but it is assumed that these data integration efforts will continue.

What the impact of such efforts has been on frauds other than the volume frauds above is less clear. Insider frauds – with or without collaboration with “organised crime groups” – are less susceptible to these sorts of measures, nor are the potential offenders subjected to the same sorts of surveillance as are “the usual suspects”. Furthermore, these measures are more difficult to apply in some other European EU and non-EU countries, which do not have the same “prevention of crime” legal exception to restrictions on data sharing within the private and the public sectors. The UK Information Commissioner has been vigilant about abuses but understanding of the value of data sharing to fraud prevention: this is rarer elsewhere. The giving of public sector fraud data (and *a fortiori* data on criminal convictions and suspicions) to the private sector is far more restricted, even in the UK. And whereas the French government created a body in 2008 to encourage collaborative efforts against fraud within the French public sector, it was not envisaged that they do anything in particular to collaborate with the private sector: in this sense, the public and private realms remain more distinct in France, and in the rest of continental Europe, than they are in the UK.

## **5 CONCLUSIONS**

Joined up working became a mantra for reformers trying to get departments to think and act “outside the silo” in the interests of “the public as a whole”. “Policing beyond the police” and the stress on business and community cooperation in policing are not of course restricted to the fraud arena: child protection, adult family violence, juvenile crime and “the national security agenda” have all been areas where “departmentalitis” has been seen as a chronic obstacle to social harm reduction. Payment card systems have allied with police and government to







make it significantly harder for websites to sell child pornography via credit and debit cards, and have raised the risks for those who wish to do so, by creating mechanisms of traceability via payment card and IP addresses. Efforts at joined-up working against fraud have been diluted or negated by the dominance of “the department” and the need to meet intra-departmental objectives and targets. Joined up working has further been constrained by the absence of significant funding, by cycles of organisational change or directional shift, often superseding or displacing reforms at the point of implementation. Rather than joining-up agencies further, governments may be more likely to consider amalgamating functions to address a specific policy objective, e.g. those cross-cutting issues that joined-up working appears not to be addressing successfully. As may be seen in Homeland Security departments, administrative reorganization may have reduced the need for *inter-departmental* “joint working” but it has not reduced the need for *internal* joint working or even internal amalgamations. The question is whether these *cultural* lessons from governmental reform will be taken on board or whether the focus will continue to be on the *form* of government, which generates a faster *image* of change and is more amenable to the impressive “road maps” favoured by management consultants.

The Fraud Review (2006) recommended that a “multi-agency approach encompassing both public and private sector organisations is required to establish an effective approach to counter fraud. This would also provide a strong deterrent message to potential fraudsters that fraud is being taken seriously and that a united stand is being taken to combat its existence” (Ibid.: 292). Indeed, under the Serious Crime Act 2007, private sector bodies were encouraged to apply for formal recognition for information-sharing with the police and other public sector bodies, extending the opportunities for not-for-profit bodies such as CIFAS and “for profit” business intelligence bodies such as Experian to generate improved fraud intelligence, alongside analysts in the National Fraud Intelligence Bureau and Action Fraud, which will receive and process centrally all fraud cases reported to the authorities. It is not yet clear how this will progress, especially in the face of the Coalition government’s opposition to Big Government databases, illustrated by the cancellation in 2010 of the national Identity Card and its underlying central registration process.

However it remains uncertain whether this sharing of information will enhance the ability of individual departments to address *their* fraud problems alone or whether it will form the basis for genuine joined-up working, which requires ongoing investment in “relationship management”. Aside from its proposals for the National Fraud Authority to take the lead in promoting collaboration, the Fraud Review (2006: 150) also coolly noted that “amongst the public sector, joint investigative units had not been widely considered but were viewed as having some potential”. Governmental cutbacks and the new age of austerity may make fraud reduction in the public sector a higher priority throughout Europe: but there are no signs of increased fraud policing and prosecution resources to act on such intelligence within the UK’s criminal justice systems. There, at least, more rapid disruption and prevention is the more likely result. This raises more general questions about what is the optimal social balance between situational opportunity





reduction and retribution for past crimes: there is already, in many countries, a significant disparity between criminal justice action against fraud (especially elite fraud) and action against “mainstream” (i.e. older-established) crimes. This raises significant issues of social justice as well as of utilitarian efficiency, especially in those jurisdictions in which economic and political power are concentrated, and where corruption and fraud by elites are significant and/or are popularly believed to be significant and “protected”. Even if a more universal metric of harm across public and private sectors could be developed, the alignment of this with the formal targets of public policing and regulatory bodies and of private corporations remains a very challenging prospect.

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