23 National Investigations Conference

#NICONF23

THURSDAY 25TH MAY

Skills & Techniques

Welcome

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Skills & Techniques Stream - Day 2

10:20	- Cautions & Other Out of Court Disposals	- *(ITS)*
10:55	- Single Justice Procedure	- *C. Norris (ITS)*
11:25	- Refreshments & Exhibition	
12:00	- Looking for Root Causes	- *N. Patience (ITS)*
12:35	- Investigation Orders	- *A Chauhan (Tenant Law)*
13:05	- Lunch & Exhibition	
14:10	- Using Financial Investigators	- *S. Martin (Ipswich)*
14:45	- Effective Open-Source Searches	- *A Sorsa (Former ITS)*
15:15	- Refreshments & Exhibition	
15:50	- The Practical Challenges Facing Investigation Hubs	- *M. Grimley (INTEC)*

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Cautions & the Police Crime and Sentencing Courts Act

Managing Director

ITS Training

Chief Executive

NIOG

Mike started his career working in the field of fraud prevention and detection. He has investigated a large variety of crimes at both local and national level. His experience includes organised crime, complex and high value investigations, surveillance and case management systems (including HOLMES).
In 1999 he set up ITS Training. The company provides a complete training and consultancy service (including an extensive list of qualifications) and remains the company of choice for high quality investigative training. In addition to designing and delivering training, Mike is an executive coach and mentor, and speaks on such subjects as law, psychology and communication. Outside of ITS, Mike is a founder, and Chief Executive, of NIOG.

The Current Situation

- Police forces and other enforcers currently have access to **up to** six out-of-court disposals for adults (Cannabis/Khat warning, Community Resolution, Penalty Notice for Disorder, Simple Cautions and Conditional Cautions).
- These are a mix of statutory and customary disposals.
- There is considerable difference in their use across the country.
- Not all organisations can or do use all of the available options.
- Recording is 'patchy' at best in some sectors.

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Police, Crime, Sentencing & Courts Act '22

- Part 6 of the Act gives sets out a two-tier framework for out-of-court disposals across England and Wales.
- The aim is to simplify the system into :
  - community cautions ; and
  - diversionary cautions.
- The intention is that the system will allow intervention and support to offenders - at an early stage in the individual's criminal behaviour, diverting them into rehabilitative services and, therefore, helping to reduce escalating patterns of offending.

Community Cautions

- The 'normal' caution rules apply, such as :
  - Sufficient evidence to charge ;
  - Full admission and consent to be cautioned ; and
  - Explanation of consequence of both accepting caution and non-compliance.
- There MUST be one or more conditions attached, which may be :
  - rehabilitation and reparation conditions (under s.110) – such as restrictions on behaviour or unpaid work ; and / or
  - financial penalty conditions (under s.111) – the amount of which will be set / limited by regulations.

Diversionary Cautions

- The normal rules apply.
- The conditions which must be attached are as for community cautions but may also include conditions relating to foreign offenders that are designed to cause them to leave the country and not return for a specified period.
- The main difference is that :
  - failure to comply with the rehabilitation condition of a community caution may lead to a further financial penalty; whereas
  - failure to comply with a diversionary caution should lead to the person being arrested and charged with the offence for which they were cautioned.

Restrictive Conditions

A restrictive condition is a condition requiring the offender

- not to meet or communicate with specified individuals ;
- not to be in or go to specified addresses, places or areas in the UK ;
- not to carry out or participate in specified activities ;
- not to engage in specified conduct (including conduct constituting crime).

An unpaid work condition is a condition requiring the offender to carry out unpaid work of a specified description for a specified period of time, which may not exceed 10 hours (CC) or 20 hours (DC).

An attendance condition is a condition requiring the offender to attend a specified place for a specified purpose, and for up to 10 hours (CC) or 20 hours (DC).

Who Can Administer?

The Act allows an "authorised person" to administer these cautions. This is defined as :

- a constable,
- an investigating officer, or
- a person authorised by a prosecution authority for purposes relating to cautions of that kind.

The term "investigating officer" includes ONLY HMRC and police support officers.

Prosecuting Authority includes AG, DPP, Director of SFO, the SoS and '…a person prescribed in regulations'.

Issues

- Not yet commenced (although being trialled in some police forces) and no commencement date known.
- When commenced, some investigation organisations may struggle to use cautions as a means of disposal, if they are not named in regulations.

118 Abolition of other cautions and out-of-court disposals

(1) No caution other than a diversionary or community caution may be given to a person aged 18 or over who admits to having committed an offence.

Action for You!

- Lobby your MP to be included in the list, if you wish to be!
- Join NIOG, and support us in our conversations with central government.

Questions?

(…or come and speak to us on the ITS stand!)

Contact Us

Email **mike@its-training-uk.com**

*Post a question on **www.niog.org.uk***

Call us on **0330 022 8262**

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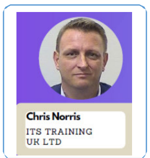
Single Justice Procedure



Senior Consultant

Chris has a strong investigation and management background, having worked with organisations including the DWP, Serious Fraud Office, Financial Conduct Authority, and the Metropolitan Police Service. With a career spanning central and local government, policing, and financial regulation, Chris now focusses on disclosure, exhibits management, and case quality standards. Chris joined ITS in 2015. He delivers training in many areas but specialises in disclosure and the National File Standard.
With a determination to drive standards across the disclosure regime, Chris recently founded and chairs the National Disclosure Working Group. Members include the Insolvency Service, Serious Fraud Office, MOD, FCA, HMRC, NCA, and the Food standards Agency

SJP - The Headlines

- Introduced April 2015
- Efficiently deals with lesser offences that don't carry a prison sentence
- No need for parties to attend a hearing
- Case can be heard by 1 magistrate
- Need not be heard in open court
- No fixed hearing date

Further considerations

- Summary-only non-imprisonable cases
- Cases can be tried on material only, in the parties' absence, and without a traditional hearing
- Defendant retains right to a full hearing in open court
- They can waive this right

The Process

1. Notice posted to defendant
2. Plea by post or can ask for a court hearing
3. If guilty plea or no response within 21 days – case dealt with through SJP
4. Not guilty plea – case goes to open court hearing
5. SJP Can be dealt with at any time by 1 Magistrate and a professional lawyer

The Paperwork

- ✓ Single Justice Procedure Notice
- ✓ Charge Sheet
- ✓ Plea Information – Notice to Defendant
- ✓ MG5, witness list, and the evidence
- ✓ Statement of Financial Means Form
- ✓ Plea & Mitigation Form

Looking Ahead - 2024

- ✓ Common (Justice) Platform in use across all E&W courts
- ✓ Go live for Single Justice Service cases
  - All police forces in England and Wales
  - All remaining non-police prosecutors

Go live means all prosecutors will transition to the new online plea system by year-end

Questions?

(…or come and speak to us on the ITS stand!)

Contact Us

Email **chris@its-training-uk.com**

*Post a question on **www.niog.org.uk***

Call us on **0330 022 8262**

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REFRESHMENTS

Back in 30 Minutes!

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Looking for Root Causes

Nick Patience
CMIOSH
Senior Associate ITS Training (UK) Ltd

Nick was an Inspector with the Health and Safety Executive for 23 years. He has investigated health and safety offences in various settings. He was trained in and has applied analytical investigation methods in complex investigations. He has jointly investigated with the Police, has prosecuted in the Magistrates' Court, and has instructed Counsel for Crown Court cases.

He left HSE in 2018 and set up his own consultancy. He is a qualified trainer and has trained many investigators. He joined the Institution of Occupational Safety and Health in 1998 and is a Chartered Member.

Who uses Root Cause Analysis?

- Healthcare / patient safety / medical devices
- Occupational health and safety
- Food Standards
- Manufacturing industries – failure analysis
- Rail/aviation
- IT/telecommunications - failure/security breaches
- Environmental releases/pollution control
- Fraud
- Quality control

Levels of Causation

Event	**Car Crashed**
Immediate Cause	**Brake Failure**
Underlying Cause	**Brakes not maintained**
Root Cause(s)	**No maintenance schedule** **No maintenance budget**

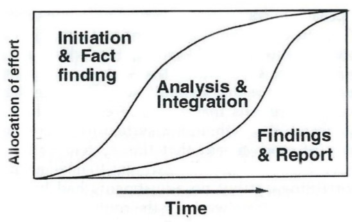
Some questions for you to consider

Why is the investigation being undertaken?
What is being investigated?
Who is investigating?
When is the investigation happening?
Where does the investigation take place?
How is the investigation conducted?

Scope of the investigation

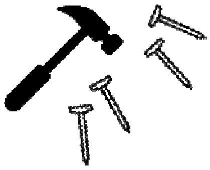
- **When looking for root causes**
  - Go beyond "firefighting" – for example the application of corrections or seeking blame.
  - Look to apply corrective and preventative actions to **prevent recurrence.**
  - Investigatory effort should be proportional to the occurrence (seriousness of actual or potential loss).
    - **NB - Repetition of the occurrence is a serious concern**

The shape of an investigation



Cognitive Bias

Maslow's Hammer – if the only tool you have is a hammer, then everything looks like a nail



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Cognitive Bias

- Seeking blame
  - Can be compounded by management and/or time pressure to report
- Confirmation Bias
  - Disregarding evidence that takes you away from what you think happened (initial assumptions – perhaps based on experience)
- "20/20 Hindsight"

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Tools for the investigator

Why? – Analytic tools help to overcome bias

- **Have a plan – refer back to my initial questions.**
  - **Define the problem in sufficient detail**
    - **Construct a timeline**

Date	Time	Evidence	Source

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Define the problem

You must understand the system the problem has occurred in.

The problem definition should be:

- **Accurate**
- **Objective**
- **Factual**

It should include:

- **What** – took place?
- **Where** – did it happen?
- **When** – in time or in the system?
- **How much** – how often or how big was it?
- **BUT NOT WHO if it identifies an individual**

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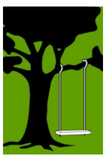
Sources of evidence/describing the system



Process Documents

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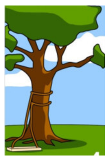
Sources of evidence/describing the system

Process Documents



Witness Description

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Sources of evidence/describing the system

Process Documents | Witness Description | Direct Observation eg Site Visit

Tools for the investigator

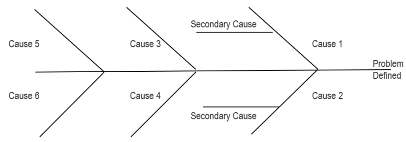
- 5 Whys (but…use with care)
- Fish Bone (Ishikawa) Diagrams
- Fault Tree Analysis

- Failure Mode and Effects Analysis
- Change Analysis
- Barrier Analysis

5 Whys

- May not be an effective interview technique if used literally.

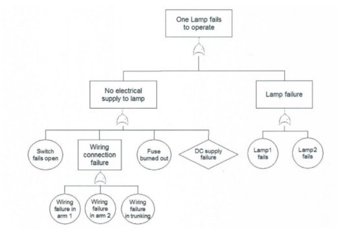
Fishbone / Ishikawa Diagram



•**Causes (Ribs):**

•People
•Environment
•Method
•Plant
•Equipment
•Materials

Fault Tree



An inductive logic process

Pitfall – stopping the investigation

Possible stop points:

➢Found someone who did something wrong
➢Found it was the subcontractor/other department
➢Found a provable breach of law

None of these are a root cause.

Pitfall - Human Error as a root cause

Investigation findings state:

- *The operator should have taken more care*
- *Be more careful in future*
- *Send for (refresher) training in…*

No Blame investigation?

Have you really found the root cause?

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Summary

- Have a plan
- Define the problem
- Keep an open mind
- Use tools to help counter bias

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Questions?

- Nick@ITS-Training-UK.com

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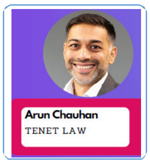
Investigation Orders – Civil Court Tools



tenet

Arun is an accomplished lawyer specialising in disputes and compliance investigations, bringing successful litigation claims to recover loss from financial fraud. Founder of disruptive law firm Tenet, the only niche law firm in its field outside of London and winner of Boutique Law Firm 2022 at the prestigious Legal Business Awards. Arun is a regular fraud expert for the BBC, quoted in The Times, The Guardian and The Telegraph.

He is Trustee Director for the Fraud Advisory Panel and provided evidence to a House of Lords Committee about the impact of digital fraud and effectiveness of the 2006 Fraud Act

Overview

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- Setting the scene
- Case study example
- Disclosure orders
- Anonymity orders
- Freezing injunction and search orders
- Conclusions
- Q&A

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Setting the scene

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- The UK lost as much as £4 billion (HoL report November 2022)
- 41% plus of all crime is fraud and cybercrime – less than 1% policing
- 47% of companies experienced fraud in the past 24 months
- Fraudulent conduct 17% higher than the same period of 2021 and 11% higher than pre-pandemic levels.
- The above translates to an increased need to understand how to investigate fraud in a landscape of financial challenge for employees and suppliers

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Case Study – housing association slide 1

- HA house a number of elderly and frail tenants in supported housing schemes.
- Housing Officers would deal with tenants' financial affairs, e.g. financial affairs, rent account explanation etc.
- Finance officer raises a concern about a payment request relating to a deceased tenant from a supported housing scheme
- Cheques requested to be sent to 'next of kin' of tenants by one particular housing officer.

Case Study – housing association slide 2

- The request on two different tenants' rent accounts were to be paid to the same named 'next of kin'
- Issue was how widespread was this?
- Options on investigations were (1) ask families of tenants about any concerns (2) reverse engineer the information about who had received the credit of the tenants' rent accounts
- Other examples of cases where clients have needed to looking into bank accounts of individuals (1) sale of parking space (2) procurement director receiving third party payments

Disclosure orders - options

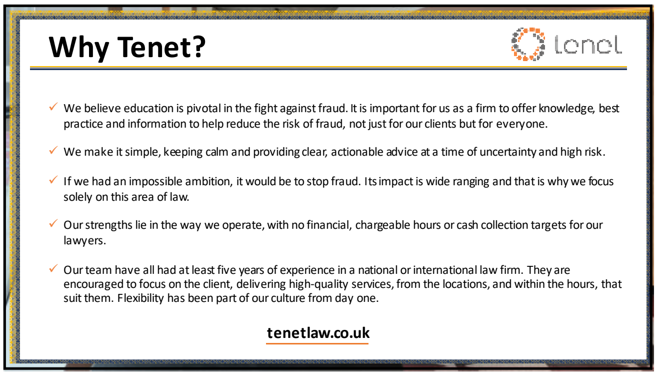
- **Norwich Pharmacal order** (information from third parties innocently caught up in another's wrongdoing typically before start of proceedings)
- **Bankers Book Evidence Act order** (copies of bank statements / ledger entries)
- **Non-Party Disclosure order** (any disclosure held by a third (non) party not involved in Court the proceedings)
- **Anonymity order** (used to anonymise sensitive subject matter proceeds where confidentiality or public interest is at risk)

Other investigative orders

- **Freezing injunction order** (restrict use of assets domestic / worldwide, specific or all pending the outcome of proceedings if can show risk of those assets being dissipated otherwise)
- **Search order** (A search order is a form of interim mandatory injunction. It requires a defendant to allow the claimant's representatives to enter the defendant's premises and to search for, copy and remove documents or material)
- **Delivery up order** (e.g., type of a mandatory injunction which can be used to compel the return of documents or other items wrongfully taken from the employer, within a certain specified period.)
- **Certificates of urgency** (used to expedite an application by explaining to the Court why an application needs to be dealt with urgently and other court work)

Conclusions

- Knowledge of options equates to speed of progress on an investigation.
- Alternative is a loss of time meaning a potential reduction in prospects of recovery of evidence or money
- Know your investigation team ahead of an event occurring
- Know your likely response as an organisation to different types of fraud


Why Tenet?
tenet
We believe education is pivotal in the fight against fraud. It is important for us as a firm to offer knowledge, best practice and information to help reduce the risk of fraud, not just for our clients but for everyone.
We make it simple, keeping calm and providing clear, actionable advice at a time of uncertainty and high risk.
If we had an impossible ambition, it would be to stop fraud. Its impact is wide ranging and that is why we focus solely on this area of law.
Our strengths lie in the way we operate, with no financial, chargeable hours or cash collection targets for our lawyers.
Our team have all had at least five years of experience in a national or international law firm. They are encouraged to focus on the client, delivering high-quality services, from the locations, and within the hours, that suit them. Flexibility has been part of our culture from day one.
tenetlaw.co.uk


Our Collaborations
Our Awards
WINNER
HIGHLY COMMENDED
FINALIST
FINALIST
Finalist
2023 Legal Awards
SHORTLISTED
Winners of
LexisNexis
Legal Awards 2022


Thank you!
tenet
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www.tenetlaw.co.uk
YES, ADD ME TO THE LIST


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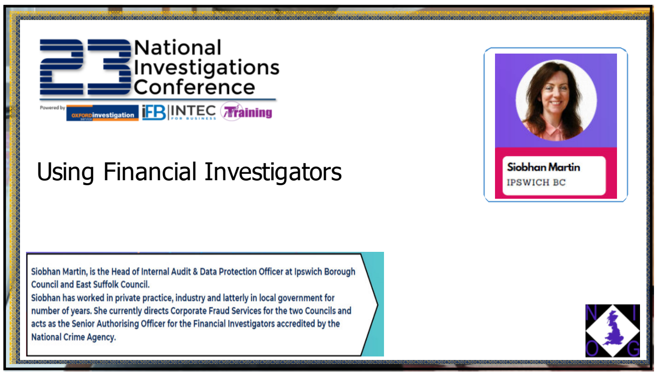
LUNCH
Back in 60 Minutes!
EXHIBITORS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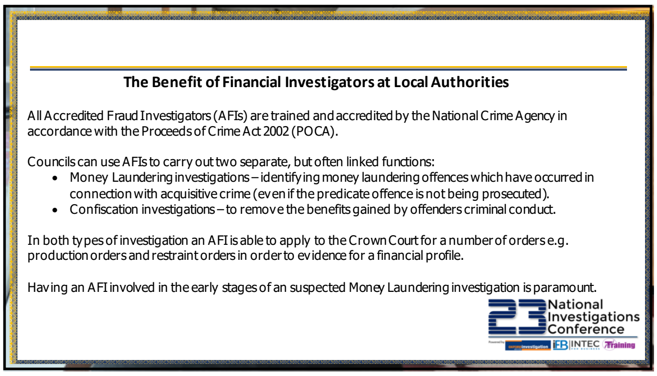
Using Financial Investigators
Siobhan Martin
IPSWICH BC
Siobhan Martin, is the Head of Internal Audit & Data Protection Officer at Ipswich Borough Council and East Suffolk Council.
Siobhan has worked in private practice, industry and latterly in local government for number of years. She currently directs Corporate Fraud Services for the two Councils and acts as the Senior Authorising Officer for the Financial Investigators accredited by the National Crime Agency.


The Benefit of Financial Investigators at Local Authorities
All Accredited Fraud Investigators (AFIs) are trained and accredited by the National Crime Agency in accordance with the Proceeds of Crime Act 2002 (POCA).
Councils can use AFIs to carry out two separate, but often linked functions:
• Money Laundering investigations – identifying money laundering offences which have occurred in connection with acquisitive crime (even if the predicate offence is not being prosecuted).
• Confiscation investigations – to remove the benefits gained by offenders criminal conduct.
In both types of investigation an AFI is able to apply to the Crown Court for a number of orders e.g. production orders and restraint orders in order to evidence for a financial profile.
Having an AFI involved in the early stages of an suspected Money Laundering investigation is paramount.
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Money Laundering Offences:

Although often linked to organised crime, such as drugs offences, modern day slavery and trafficking, there is also potential features of any acquisitive (excessively interested in acquiring money or material things) crime.

Can be as simple as receiving the proceeds of crime. This could be anything that has a value – cash, goods, property, intellectual property etc.

Many of the offences dealt with by Council Enforcement Teams will involve acquisitive crimes, therefore it is likely that money laundering offences are also being committed alongside the predicate offence. Money Laundering offences carry the penalty of 14 years imprisonment, these offences are committed to Crown Court for proceedings and sentencing upon conviction.

Money Laundering investigations can show a defendant 'general conduct', which enables the AFI to consider up to 6 years previous life style activities. Any subsequent Confiscation case could result in greater asset recovery.

Confiscation:

AFIs will calculate the amount by which a convicted party has benefitted from their criminal activity (known as the recoverable amount) and then identify assets that can be recovered to repay this benefit and determine their value (known as the available amount).

This information is then presented to the Crown Court, in order for them to make a Confiscation Order for the appropriate amount. The Confiscation Order is dealt with after a conviction but always prior to sentencing.

Confiscation Orders are payable and a timetable is set for assets to be dissipated e.g. longer timetable set for the sale of property. Non payment carries a default prison sentence and interest can be charged on the figure agreed on the Confiscation Order if not paid within the set timetable.

Asset Recovery Incentivisation Scheme (ARIS):

The scheme under which confiscated funds are redistributed to agencies involved in the recovery process.

The scheme's objective is to provide Law Enforcement Agencies including Local Authorities with incentives to pursue asset recovery as a contribution to the overall aims of cutting crime and delivering justice.

Funds paid by an offender under a Confiscation Order are distributed as follows:

50%	Home Office
12.5%	Enforcement (HMCTS)
18.75%	Investigating Authority
18.75%	Prosecuting Authority

Funds can be used for any purpose; however, the Home Office suggest that in accordance with the spirit of the scheme
they should be used to drive up performance on asset recovery or fund local crime fighting
Priorities for the benefit of the community.

Points to consider:

Potential income from ARIS funds must not be used as motivation to prosecute, however it cannot be ignored that the scheme is designed to distribute confiscated funds back to the various parties involved in the investigation as an incentive to Law Enforcement Agencies to deal with criminality.

Early engagement with an AFI is important. Contact should be made as soon as appropriate cases are identified in order to ensure POCA can be applied – confiscation cannot be considered after sentence for the predicate/Money Laundering offence.

Drafting of charges can have a significant impact upon the viability of POCA activity, thus involving an AFI at an early stage is important.

Information obtained by an AFI must be used for a 'POCA purpose' i.e. a Money Laundering or Confiscation investigation. However, if the information contains evidence that would support the investigation into the predicate offence, this can be provided in evidential format to the Investigation Officer in respect of the predicted offence.

Contact Details:

Siobhan Martin – Head of Internal Audit & SAO – East Suffolk Council & Ipswich Borough Council
Email: siobhan.martin@eastsuffolk.gov.uk
Mob: 07785 355337

Sheila Mills-James - Corporate Fraud Manager – East Suffolk Council
Email: sheila.mills@eastsuffolk.gov.uk
Tel: 01394 444292

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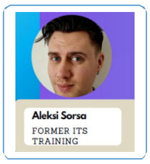
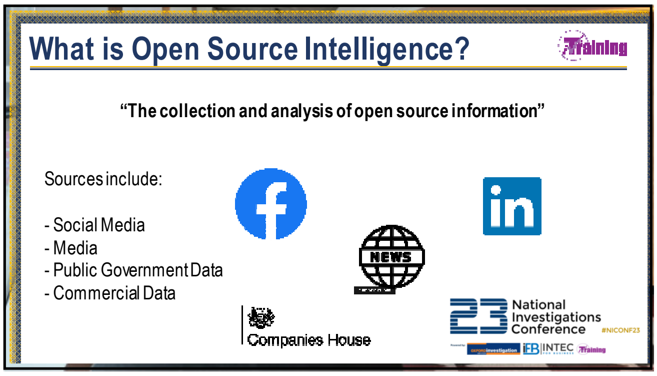
Effective Open Source Searches



Aleksi has had an accomplished career within the world of investigations with Oxford City Council, with years of experience which saw his journey from Apprentice, Intelligence Officer to Investigation Officer. He has extensive experience in civil and criminal investigations and also provided services for counter-fraud consultancy and risk assessments. During his time with Oxford City Council, Aleksi was also a trainer through ITS Training to share his experience across the country.
He currently works as an Ethics and Compliance Analyst for WSP, one of the world's leading engineering and professional services companies.


What is Open Source Intelligence?
Training
"The collection and analysis of open source information"
Sources include:
- Social Media
- Media
- Public Government Data
- Commercial Data
NEWS
Companies House
National Investigations Conference


Searching Search Engines... What's the difference?
Training
yahoo!
DuckDuckGo
bing
Google
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How to trace with Social Media...
Training
Google Maps
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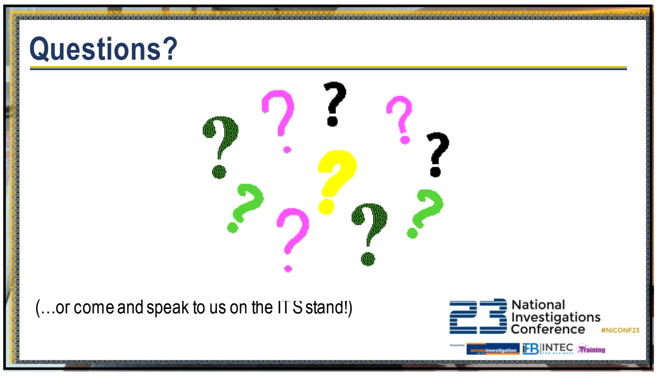
Questions?
(...or come and speak to us on the IT S stand!)
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The Practical Challenges Facing Investigation Hubs

Mark has worked closely with public sector fraud professionals for over 20 years now. Delivering training, consultancy, and support on all of the systems provided by INTEC for Business. He has now worked with over 120 different local authorities around the country and supported projects ranging from simple advice and guidance, to detailed data matching projects aimed at returning cashable savings to INTEC's extensive customer base. Working first hand with onboarding new customers as well as continually supporting INTEC's existing customer base has given Mark and the team at INTEC an extensive knowledge on the challenges that face investigators today.
"This is a key event for INTEC to attend every year, its great to catch up with our customers and meet a range of potential new ones. Me, Steve, Theo and the Customer Care team at INTEC pride ourselves on delivering a service and solutions that meet the challenges investigators face on a daily basis"

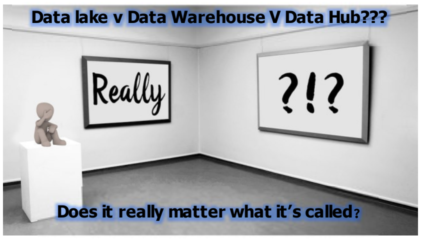
Introduction

- Mark Grimley – Director
- 20+ years with INTEC for Business
- Over 70 local authorities using our IDIS software
- Single LA, shared services & regional hubs

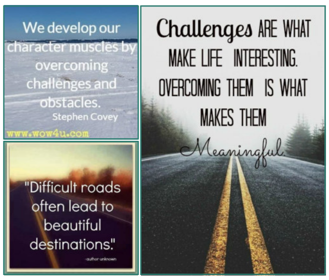
So what have we got?

Data Lake	Data Warehouse	Data Hub
"A data lake is a system or data repository used to store data in its natural format."	"A data warehouse is a data storage system used for reporting and data analysis."	"A data hub is a simple collection of organised data objects from multiple sources. Distributed in the form of a hub and spoke architecture."

Lake v Warehouse v Hub???



So what are the challenges?



GDPR

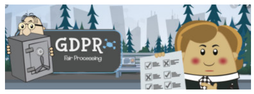
GDPR

Disclaimer: Mark Grimley is not, never has been, and will not claim to be an expert on GDPR or Data Protection. The management of INTEC accept no responsibility for him speaking absolute TOSH!

- These are just a few examples
  - GDPR - "Task carried out in the public interest"
  - GDPR – "Consent of the data subject"
  - Section 68 of the Serious Crime Act 2007 allows sharing for fraud prevention with "Specified anti fraud Organizations"?

GDPR - Examples

- Disclaimers/fair processing agreements signed by customers.
- Full data processing guidelines and procedures documented.
- Privacy impact assessments;
  - Corporate wide
  - Individual campaigns
- Data sharing agreements

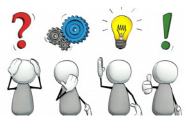


- All based on the "Prevention and detection of crime"

What matches can we run?

- What campaigns could we run?
- Which campaigns will bring the biggest savings?
- What data can we match against?
- Internal data V Credit reference agencies

- What services do we offer that cost the authority money?
- Are there conditions linked to the provision of this service?
- Could we recover this money?



Data Quality

- "Our data is 100% accurate, we have
  - validated every customer
  - gathered their full address, including postcode,
  - its all entered into the correct fields on our systems"

Said NO ONE EVER!!

Data Quality

- Some Examples….

Mr M Grimley
Above the corner shop
15 High Street
Manchester
M33 0GS

C/O INTEC
Mark Grimley
Manchester Business Park
Manchester
M33 0GS

Mr M Grimley
Bedroom 1a
15 High Street
Manchester
M33 0GS

Mr Grimley
15 High Street
Manchester
M33 1GS

Person Name
Business Name
Not Listed
Postcode

Internal data V CRA data

- Internal Data
  - Costs nothing
  - Data sharing, easier?
  - When was it last validated?
  - How accurate is it?
  - What information do we hold?
  - Can we use it?

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Internal data V CRA data

- CRA or External Data
  - It is updated regularly
  - You only need your initial data set
  - Data sharing agreements
  - Quicker?
  - Easier?
- From our experience using CRA data delivers significantly more savings.

Internal data V CRA data

- Think about what you are looking to achieve
  - Is the data I am using going to help?
  - How reliable is the data I am matching against?
  - What are the costs, not just money!
  - What rules are you applying to the match?
  - What results do I want?
  - What savings "per result" could I achieve?
  - What is involved in proving a result?

Technology

- How are you going to carry out these matches?
- What do you want from a software system?
- Data matching V Data profiling
- Cost V Functionality
- How user friendly is it?
- How do you build this into the teams future plans?
- What return on investment will it bring?
- Are we going to use the system effectively?

Technology

- How do we interpret the results?
- Do we rely 100% on the automated results
- Human intervention is needed!!

Technology

- Examples
  - Single Person Discount Matches

• Joint accounts • Services listed under an old partners name • Students who have moved	• Mr M Little • Mr M Littel • Mr M Litle • Mark Litel

Technology

- IDIS – INTEC's Data Intelligence Solution
- Now covering over 65 local authorities
  - In the past 5 years alone
    - Accessed over 150,000 times
    - 1,300+ different campaigns
    - Over 1,200,000 credit searches
    - 8,000,000 records uploaded
    - Delivered Over £25M in savings

Resources

- Ensuring you have the resource to make use of an investigation hub is vital.
- No good having a Porsche in the garage that you never drive.
- Think about…
  - Collecting the data
  - Processing the campaign
  - Managing the results
  - Resource costs money (Invest to Save)

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Resources

- Collecting the data
  - How often will you do these matches?
  - What departments/organisations are involved?
  - Data quality, are changes needed?
- Processing the campaigns
  - Do they know exactly how to run the matches?
  - Is it simply pressing a few buttons or a full report builder?

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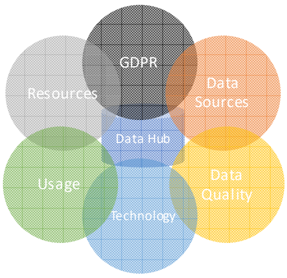
Conclusion



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Conclusion

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The Practical Challenges Facing Investigation Hubs

Any Questions?

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CLOSE OF CONFERENCE