
Association of Chief Police Officers & Association of British Insurers



Association of British Insurers

Memorandum of Understanding

‘Guidelines on the exchange of information between
the Police & Insurance Companies
and Loss Adjusters’

Revised January 2005

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1. Introduction

It is evident that there are significant attempts to obtain money fraudulently from the Insurance Industry and this is a criminal matter. It is the intention of the Association of Chief Police Officers (ACPO) & the Association of British Insurers (ABI) to work together to address this problem. The purpose of this Memorandum of Understanding (MOU) is to provide guidelines for Forces and Insurers.

This MOU replaces the previous guidelines issued by ACPO Crime Committee in 2002 and is intended to complement the previous ACPO document 'Acceptance criteria and guidelines for the reporting of suspected fraudulent insurance claims to the Police'.

This MOU results from numerous meetings between the ACPO, ABI and representatives of the Insurance Industry and the Information Commissioner.

2. General Principles

The following are general principles which have been agreed.

- 2.1 This MOU is intended to deal with requests for information from Insurers and Loss Adjusters involving property crime, although they could be applied to other crime categories. These guidelines only apply to issues arising from the insurance claim and not queries arising from the proposal.
- 2.2 Previous convictions, cautions, reprimands and final warnings will not be supplied. It makes no difference if the claimant consents.
- 2.3 While nothing in this MOU prevents claimants from using the subject access arrangements at the request of an Insurer, when the Criminal Records Bureau is producing the Basic Check Certificates (Certificates of Unspent Convictions) it may become unlawful for Insurers to require persons to obtain their previous convictions and cautions by means of the subject access procedure (Section 56, Data Protection Act 1998).
- 2.4 Every request for information will be considered on an individual basis. Reasons for agreeing or not agreeing to disclosure will be recorded. Information supplied pursuant to this MOU will only be used for the purposes given.
- 2.5 Requests for information will only be received for consideration from Insurance Companies specified in Appendix A and Loss Adjusters acting on their behalf. A list of Insurers who are party to these guidelines as ABI members are listed at Appendix A with Head Office contact details. A full and current list can be found on the ABI's website at www.abi.org.uk by clicking on 'About the ABI', then 'Our Members'. Each Force will establish a postal contact point for liaison with the Insurance Industry in connection with these guidelines as indicated in Appendix B.
- 2.6 The ABI, insurance companies and loss adjusters are included in the standard notifications made by Police Forces under the Data Protection Act.
- 2.7 The ABI have prepared guidance for its members in respect of applying for information under this agreement and subsequent use (Appendix G).
- 2.8 Claimants will be advised at the proposal and claim stage that the Insurer may exchange relevant information with the Police where any claim is believed to be fraudulent or with the consent of the claimant in cases where this is needed to validate the claim. This in itself could be regarded as a valuable crime prevention measure which could make claimants think twice before making a fraudulent insurance claim.
- 2.9 The Insurance industry accepts that values of property may not be accurate when supplied at time of stress and that property lists may be incomplete. If Force systems enable staff to identify the dates when property was reported stolen, this information can be disclosed to the Insurer if it is relevant to the validation of a specific claim. The Insurance industry recognises that forces keep this information for policing purposes and not the evaluation of insurance claims.
- 2.10 The ABI on behalf of the Insurance industry has agreed to indemnify all participating Police Forces in respect of the information supplied under these guidelines (Appendix C).
- 2.11 Request forms from the Insurer should be authorised by a person with sufficient seniority and experience to have satisfactory knowledge of these guidelines and be able to ensure that the set criteria are met.

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- 2.12 Any disputes in relation to the provision of information under these guidelines should be escalated within the police force or insurer in an effort to resolve the issues. For example, a claims handler would refer the matter to the head of claims or claims director. For police forces, any disputed requests should be referred to the Data Protection Officer.
- 2.13 The ABI will act as a central contact point in relation to any issues with the content of the guidelines. Insurance Database Ltd (IDSL)/Polaris UK Ltd run a database of household, motor claims, personal injury and travel claims, which can be checked to see if an individual has submitted an insurance claim. Police should submit written requests on an appropriate form giving name, full postal address and date of birth if known, of the claimant as well as type and estimated date of claim, by fax to ISDL on 020 7265 5766. For further information telephone 020 7265 5766.
- 2.14 These guidelines will be subject to review in the light of experience of their operation initially after 12 months and at three yearly intervals thereafter.

3. Communication from Insurance Companies and Loss Adjusters

- 3.1 A considerable amount of communication takes place between the Insurance Industry and Police Service and it is in the interest of all parties that workloads are kept to a minimum.
- 3.2 Letters from the Insurer which merely request that an interest is noted should not be sent unless covered by section 6 following the settlement of a claim.
- 3.3 Requests for information from the Insurer where there is specific reason to check a claim will be dealt with in accordance with Section 4 of this MOU.
- 3.4 Request for information from the Insurer where there is evidence to suspect a fraudulent insurance claim will be dealt with in accordance with Section 5 of this MOU.
- 3.5 Requests from the Insurer for a Force to investigate crime will be evaluated on the basis of the grounds for suspicion put forward and in accordance with the ACPO / ABI document (Acceptance criteria and guidelines for the reporting of suspected fraudulent insurance claims to the Police).

4. Supply of information where there is specific reason to check a claim

4.1 Insurers may request information from police about a reported crime/loss of property where the insurer has a specific reason to check a related claim. Where requests are made they must be in the agreed format (Appendix D(a) or D(b)).

4.1.1 Appendix D(a): This form should be used when the Insurer wishes to obtain confirmation of the following information about the crime/lost property; Crime/Lost Property Reference Number, date and time the loss offence was reported, reporting person. Forces are asked to make the Insurer aware if this information is not available. The charge for this will be £20 and Forces will endeavour to respond within 10 working days.

4.1.2 Appendix D (b): This form should be used when the Insurer requires information in addition to the above. The charge for this will be £75 and Forces will endeavour to reply within 20 working days.

In respect of the charges mentioned in 4.1.1 & 4.1.2 above cheques should be made payable to the respective police authorities e.g. 'Leicestershire Police Authority'.

4.2 Forces are asked to let the Insurer know if they are unlikely to be able to respond in the time limit and should provide the contact details of the person dealing.

4.3 If there are exceptional circumstances where the Insurer requires information urgently, the Insurer should approach the appropriate Force to discuss if it is possible to have a quick response. Insurers should note that this may incur overtime and the costs of this may have to be paid by the Insurer.

4.4 Insurers should note that comprehensive information will not be provided by police. Insurers must ask specific questions on the relevant form.

4.5 In exceptional cases it will be possible under this section for Insurance Companies and Loss Adjusters to seek formal interviews with Police Officers at the standard fee, (currently £ 104). The authority for such interviews will be at the discretion of the Force concerned and any interviews will be conducted under ACPO guidelines.

4.6 The release of information may be delayed. For example, there may be outstanding criminal proceedings in relation to the original offence which gave rise to the insurance claim. In these circumstances all information will be sub-judice and the Police may need to consult with the Crown Prosecution Service for their advice regarding if disclosure will jeopardise the court proceedings. It is very unlikely that anyone will be given a copy of their statement prior to any court hearing. The Police may, however, advise if a person has been charged (although personal information will not be released) and/or indicate that there is no suspicion about the claimant.

4.7 The information requested should be factual and clearly specified on the Form. The Police will not give expressions of opinion and can only provide an answer to question where the claimant has consented.

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- 4.8 The Insurer will write to claimants with a list of the specific information they intend to request the Force to disclose, along with their reasons for requesting its disclosure. The claimant will be asked to give written consent to the disclosure and issue of specified information /material by the Force. If any such consent is given, then it must be fully informed and the person consenting must be the person to whom the information relates. The Claimant will also be asked to indicate whether they wish to be sent a copy of the information / material at the same time as it is forwarded to the Insurer/loss adjusters. A copy of the form with the Claimant's written explicit consent will be forwarded to the Force prior to disclosure being made.
- 4.9 A general consent to disclosure at the proposal or claim stage will not be acceptable under these guidelines. This would put undue pressure on the individual to agree to disclosure. The Insured would not have any idea of what disclosures were being made.
- 4.10 Refusal by the Claimant to give consent to disclosure will not, by itself provide grounds for the Insurer to revert to Section 5 of this MOU for disclosure of information.

5. Supply of information where there is evidence to suspect a fraudulent insurance claim

5.1 When an Insurer has evidence which suggests a fraudulent claim, the form at Appendix E should be completed. This should include: -

- Why the claim is believed to be fraudulent,
- What information is requested,
- Why this information is requested

Applications for information made by Insurance Companies and Loss Adjusters in this category will not breach the Data Protection Act 1998 due to the Section 29(3) exemption.

5.2 Forces will undertake to advise Insurers when there is evidence to demonstrate that a fraudulent insurance claim has been made. They would normally be advised as part of the investigation. This would be a disclosure under police powers for the prevention and detection of crime permitted by Section 29 (3) of the Data Protection Act 1998. (Appendix F may be used)

5.3 No fee will be charged under this section.

5.4 Liaison will be allowed with the investigating officer in appropriate cases.

5.5 In addition, formal interviews may be allowed following the conclusion of any criminal proceedings. A decision will be taken by the Force concerned whether it would be appropriate to charge the standard fee.

5.6 Insurers must note that in order to comply with the legal basis for the disclosure of information under this section of this MOU, they are responsible for notifying the Force of the outcome of their investigation. Where the Insurer has any further evidence of criminal conduct they will notify the relevant Force and provide assistance to enable the Force to consider criminal proceedings.

5.7 Should a Claimant be successfully prosecuted or cautioned in relation to a fraudulent insurance claim the Force will notify the Insurer.

6. Post claim procedures

- 6.1 Where the Insurer is a victim of a fraudulent claim, which results in criminal proceedings then the Force, will keep the Insurer advised in order that they may claim compensation.
- 6.2 **Having settled a claim**, if in accordance with the ABI guidance the Insurer wishes to claim the return of any property which might be recovered then notification to that effect will be sent to the Force.
- 6.3 The Force will endorse the crime report accordingly, no acknowledgement will be sent.
- 6.4 The Insurer (not the Insured) should be advised that the property is available for collection. If the Insurer is notified that the property in question is available for collection then they will undertake such collection promptly.
- 6.5 In the event of conflicting claims appropriate legal advice may be obtained.
- 6.6 If a person (including a juvenile) has been convicted or cautioned, received a final warning or a reprimand, their name and address can be released to the Insurer for the purpose of claiming compensation.

7. Additional Guidance from the ABI to assist forces when a request for disclosure of personal information is received in connection with an Insurance Claim

7.1 Forces may receive a request for disclosure of names and addresses from a third party who has suffered injury or damage to their property and wishes to claim damages. It is reasonable to provide these details if the person's insurance is required to meet the claim because failure to do so could prevent the third party claiming damages to which they are entitled. These incidents may have occurred when a vehicle has been stolen.

7.2 The following scenarios may assist forces in their decision making: -

If a thief steals a car and causes personal injury/damage to property, the insurer of the stolen car is required by the Road Traffic Act to meet the claim.
This only applies, however, if the thief is identified i.e. in effect there's someone to sue.

If a thief steals a car, causes personal injury/damage to property and runs off, leaving the car at the scene, the Motor Insurers' Bureau (MIB) meets the claim (subject to a £300 excess in respect of the property damage element).

If a thief steals a car, causes personal injury/damage to property, and drives off (i.e. "hit and run"), the MIB meets the personal injury element only. Property damage is excluded altogether, in view of the likelihood of fraud.

INSURANCE INFORMATION LIAISON DETAILS

Please check the member list on the ABI's website (www.abi.org.uk/CompanyList) if insurer details are not included in the list below.

The AA
Southwood B1
Apollo Rise
Farnborough
Hampshire
GU14 0JW
01252 700931

Abbey National Life Plc
287 St Vincent Street
Glasgow
G2 5NB
0141 275 8000

ACE European Group Limited
100 Leadenhall Street
London
EC3A 3BP
020 7173 7000

Admiral Insurance Co Ltd
Capital Tower
Greyfriars Road
Cardiff
CF10 3AZ
0870 243 2431

Aioi Motor and General Insurance Company
1st Floor
50 Mark Lane
London
EC
020 7481 9157

Alba Life Limited
Britannic Court
50 Bothwell Street
Glasgow
G2 6HR
08707 032000

Alliance & Leicester General Insurance Company
Ltd.
P.O.BOX 32
Leeds
LS11 9HG
0870 333 3066

Allianz Cornhill Insurance plc
57 Ladymead
Guildford
Surrey
GU1 1DB
01483 568161

Ambassador Insurance Company Ltd
Tredegar Park
Newport
Gwent
NP1 9SB
01633 810666

American Re-Insurance Company
154 Fenchurch Street
London
EC3M 6JJ
020 7975 5715

Ansvar Insurance Co Ltd
31 St Leonards Road
Eastbourne
East Sussex
BN21 3UR
01323 737541

Aspen Insurance UK Limited
88 Leadenhall Street
London
EC3A 3BA
020 7929 4000

Assicurazioni Generali SpA
100 Lemman Street
London
E1 8AJ
020 7265 6200

Assitalia Le Assicurazioni d'Italia SpA
100 Lemman Street
London
E1 8AJ
020 7265 6200

Atradius
3 Harbour Drive
Capital Waterside
Cardiff
CF1 6TZ
029 2082 4000

Association of Chief Police Officers & Association of British Insurers

Aviva Insurance
PO Box 6
Surrey Street
Norwich
NR1 3NG
01603 622200

Avon Insurance PLC
Arden Street
Stratford Upon Avon
Warwickshire
CV37 6WA
01789 414211

AXA Insurance plc
One Aldgate
London
EC3N 1RE
020 7702 3109

B&CE Insurance Limited
Manor Royal
Crawley
Sussex
RH10 9QP
01293 526911

Baillie Gifford Life Limited
Calton Square
1 Greenside Row
Edinburgh
EH1 3AN
0131 275 2000

Bankers Insurance Company Limited
117 -119 Whitby Road
Slough;
Berkshire
SL1 3DR
0870 152 6100

Baptist Insurance Co PLC
Beaufort House
Gloucester
Gloucestershire
GL1 1JZ
0845 070 2223

Barclays Life Assurance Co. Ltd.
Murray House
1 Royal Mint Court
London
EC3N 4HH
020 7977 7977

Bradford Insurance Company Ltd
New Hall Place
Old Hall Pace
Liverpool
L3 9UE
0151 239 3000

Bristol Contributory Welfare Association Ltd.
James Tudor House
90 Victoria Street
Bristol
BS1 6DF
0117 929 5529

Brit Insurance Limited
55 Bishopsgate
London
EC2N 3AS
020 7984 8800

Britannic Assurance
1 Wythall Green Way
Wythall
Birmingham
B47 6WG
0845 9380573

British & European Reinsurance Company Limited
69 Park Lane
Croydon;
Surrey
CR9 1BG
020 7839 5678

British & Foreign Marine Insurance Co. Ltd.
1 Cornhill
London
EC3V 3QR
01403 232323

British Equitable Assurance Co Ltd
107 Cheapside
London
EC2V 6DU
020 7606 7788

Budget Insurance Co Ltd
Budget House
Bretton Way
Bretton
Peterborough
PE3 8BG
01733 845555

Caledonian Insurance Co.
Royal Liver Building
Pier Head
Liverpool
L3 1HT
0151 236 1451

Canada Life Limited
Canada Life House
High Street;
Potters Bar
Herts
EN6 5BA
01707 651122

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Canterbury Life Assurance Co. Ltd
Royal London House
Middleborough
Colchester
Essex
CO1 1RA
01206 761761

Carraig Insurance Company Ltd
Montagu Pavilion
8-10 Queensway
Gibraltar
00 350 49 663

Casualty & General Insurance Company (Europe)
Ltd
Suite 2C
Eurolife Building; 1 Corral Road
00 350 47250

Catlin Insurance Company Limited
6th Floor; 3 Minster Court
Mincing Lane
London
EC3R 7DD
020 7626 0486

Cavendish Insurance Plc
Leadenhall Court
London
EC3V 1PP
020 7283 9000

Century Insurance Co. Ltd
New Hall Place
Liverpool
L69 3HS
0151 227 4422

CGNU Life Assurance Limited
Pitheavlis
Perth
Scotland
PH2 ONH
01738 621202

CGU Insurance plc
St Helen's
1 Undershaft
London
EC3P 3DQ
020 7283 7500

China Insurance Co (U.K.) Ltd.
The Communications Building
48 Leicester Square
London
WC2H 7LT
020 7839 1888

Chubb Insurance Company of Europe
106 Fenchurch Street
London
EC3M 5NB
020 7956 5000

Churchill Insurance Company Ltd
Churchill Court
Westmoreland Place; Masons Hill
Bromley
Kent
BR1 1DP

CIGNA Life Insurance Company of Europe
Knowe Road
Greenock
Inverclyde
PA15 4RJ
01475 788361

CitiLife Financial Limited
1 North Wall Quay
Dublin 1
Ireland
00353 1 622 2000

City of London Insurance Co Ltd
Zurich House
Stanhope Road
Portsmouth
Hampshire
PO1 1DU
02392 822200

City of Westminster Assurance Co. Ltd.
PO Box 1023
Luton
LU1 2XN
01582 742800

Clerical Medical Investment Group Limited
33 Old Broad Street
London
EC2N 1HZ
020 7930 5474

CNA Insurance Company Limited
77 Gracechurch Street
London
EC3V 0DL
020 7548 1148

Co-operative Insurance Society Limited
Miller Street
Manchester
M60 0AL
0161 832 8686

Collingwood Insurance Company Limited
Montagu Pavilion
8-10 Queensway
00 350 42686

Association of Chief Police Officers & Association of British Insurers

Combined Life Assurance Company Limited
Combined House
15 Wheatfield Way
Kingston upon Thames
Surrey
KT1 2PA
020 8546 7733

Commercial Union Assurance Company Limited
1 Undershaft
St Helen's
London
EC3P 3DQ
020 7283 7500

Congregational & General Insurance P.L.C.
Curren House
Curren Street
Bradford
West Yorkshire
BD1 5BA
01274 700700

Contingency Insurance Co. Ltd
2 Minster Court
Mincing lane
London
EC3R 7FB
020 7623 5280

Converium Insurance Company (UK) Limited
London Underwriting Centre
3 Minster Court
Mincing lane
London
EC3R 7DD
020 7617 4881

Cornish Mutual Assurance Co Ltd
Tremorvah House
Tregolls Road
Truro
Cornwall
TR1 1NP
01892 277151

Countrywide Assured Plc
Harbour House
Portway
Preston
PR2 2PR
01772 840000

Criterion Life Assurance Limited
Great Hall
Mount Pleasant Road
Tunbridge Wells
Kent
TN1 1RG
01730 263281

CX Reinsurance Company Limited
The London Underwriting Centre
3 Minster Court
Mincing Lane
London
EC3R 7DD
020 7548 1174

DAS Legal Expenses Insurance Company Limited
DAS House
Quay Side;
Temple Back
Bristol
BS1 6NH
0117 934 2000

De Montfort Insurance Company PLC
The Grange
Rearsby
Leicester
Leicestershire
LE7 4FY
01664 424896

Deutsche Asset Management Life & Pensions
Limited
20 Finsbury Circus
London
EC2M 1NB
020 7545 6000

Domestic & General Insurance PLC
Swan Court
Mansel Road
Wimbledon
London
SW19 4AA
020 8946 7777

Dowa Insurance Company (Europe) Ltd
9-13 Fenchurch Buildings
London
EC3M 5HR
020 7265 1107

Eagle Star Insurance Company (Ireland) Limited
Eagle Star House
Ballsbridge Park
Dublin 4
00353 1 6670 666

Ecclesiastical Insurance Group plc
Beaufort House
Brunswick Road
Glos
Gloucester
GL1 1JZ
01452 528533

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Ecumenical Insurance Company Ltd
Beaufort House
Brunswick Road
Gloucester
GL1 1JZ
01452 528533

Edinburgh Assurance Company Ltd
1 Undershaft
St Helen's
London
EC3P 3DQ
020 7283 7500

Elders Insurance Co Ltd
St Mark's Court
Chart Way
Horsham
West Sussex
RH12 1XL
01403 232323

Electrical Contractors' Insurance Company Ltd
Central Court
Knoll Rise
Orpington
Kent
BR6 OJA
01689 883250

ELVIA Travel Insurance International N.V.
Mondial House
102 George Street
Croydon
Surrey
CR9 6HD
020 8603 9190

Endurance Worldwide Insurance Ltd
7th Floor
2 Minster Court; Mincing Lane
London
EC3R 7BB
020 73372847

Equine & Livestock Insurance Co. Limited
Thorpe Underwood Hall
Ouseburn
York
YO26 9SZ
08707 423800

esure Insurance Limited
At the Observatory
Reigate
Surrey
RH2 0SG
01737 222222

ETI International Travel Protection
154 Fenchurch Street
London
EC3M 6JJ
0870 2415049

Euler Hermes UK plc
1 Canada Square
London
E14 5DX
020 7512 9333

Europ Assistance Insurance Limited
Sussex House
Perrymount Road
Haywards Heath
West Sussex
RH12 1DN
01444 411999

Exeter Friendly Society Ltd
Beech Hill House
Walnut Gardens
Exeter
Devon
EX4 4DG
01392 353500

FARADAY Reinsurance Co. Limited
New London House
6 London Street
London
EC3R 7QL
020 7481 1533

Fidelity Investments Life Insurance Limited
Beech Gate
Millfield Lane
Lower Kingswood
Surrey
KT20 6RB
0800 358 4050

Financial Insurance Company Limited
Vantage Great West Road
Brentford
Middlesex
TW8 9AG
020 8380 3000

First Alternative Insurance Company Limited
The Observatory
Castlefield Road
Reigate
Surrey
RH2 0SG
01737 641376

Association of Chief Police Officers & Association of British Insurers

Forester Life Limited
Foresters House
Cromwell Avenue
Bromley
Kent
BR2 9BF
020 8628 3400

FP Life Assurance Limited
Pixham End
Dorking
Surrey
RH4 1QA
0870 6083678

GE Frankona Reinsurance
Regis House
45 King William Street
London
EC4R 9AN
020 7847 3300

GE Insurance Holdings
Vantage West
Great West Road
Brentford
Middlesex
TW8 9AG
020 8380 3000

Gen Re UK
The Corn Exchange
55 Mark Lane
London
EC3R 7NE
020 7426 6000

General Accident Fire and Life Assurance
Corporation
St Helen's
1 Undershaft
London
EC3P 3DQ
020 7283 7500

General Accident Reinsurance Co Ltd
Pitheavlis
Perth
Scotland
PH2 0NH
01738 621202

General Cologne Re UK Limited
The Corn Exchange
55 Mark Lane
London
EC3R 7NE
020 7426 6000

Gerling General Insurance Co - UK Branch
50 Fenchurch Street
London
EC3M 3JY
020 7696 8099

Gisbourne Life Assurance Company Limited
PO Box 33
100 Holdenhurst Road
Bournemouth
BH8 8AL
01202 292373

Gouda Insurance Company
Shurding Road
Cheltenham
GL51 4UE
01242 866866

Gresham Insurance Company Limited
Temple Court
11 Queen Victoria Street
London
EC4N 4TP
020 7528 6200

Groupama General Insurance Company Ltd
2 Minister Court
Mincing lane
London
EC3R 7FB
08708 508510

Guarantee Society Ltd
One Lloyds Avenue
London
EC3N 3DH
020 7481 8999

Guardian Linked Life Assurance Ltd
Aegon House
3 Lochside Ave
Edinburgh
EH12 9XX
0131 339 9191

Guardian Royal Exchange Plc
107 Cheapside
London
EC2V 6DU

Guildhall Insurance Co Ltd
St Mark's Court
Chart Way
Horsham
West Sussex
RH12 1XL
01403 232323

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Halifax Life Limited
Trinity Road
Halifax
West Yorkshire
HX1 2RG
01422 611110

Hamilton Insurance Company Limited
Hamilton Insurance
HFC Bank
Winkfield
Berkshire
SL4 4TD
01344 892666

Hannover Life Reassurance (UK) Ltd
Hannover House
Virginia Water
Surrey
GU25 4AA
01344 845282

Hartford Life
One Canada Square
Canary Wharf
London
E14 5AA
020 7 5129 243

Haven Insurance Policies Limited
PO Box 6
Surrey Street
Norwich
NR1 3NG
01603 622200

HBOS General Insurance
1 Lovell Park Road
Leeds
LS1 5NS

Henderson Global Investors
3 Finsbury Avenue
London
EC2M 2PA
020 7818 5817

Highway Insurance Company Limited
Highway House
171 Kings Road
Brentwood
Essex
CM14 4EJ
01277 263636

Hiscox Insurance Company Ltd
1 Great St Helen's
London
EC3A 6HX
020 7448 6000

Hitachi Capital Insurance Europe Ltd
Walbrook Business Centre
Green Lane
Hounslow
Middlesex
TW4 6NW
020 8607 6699

Home & Overseas Insurance Co.Ltd.
Apex View
Leeds
LS11 9HL
020 7434 3002

Homecare Insurance Ltd
Holgate Park
York
YO26 4GA
01904 544600

HSBC Insurance (UK) Limited
Wigham House
Wakering Road
Barking
Essex
IG11 8PB
020 8911 5000

IGI Insurance Co. Ltd.
Market Square House
St Jame's Street
Nottingham
NG1 6FG
0115 941 1022

Indemnity Insurance Limited
Churchill Court
Westmoreland Road
Bromley
Kent
BR1 1DP
020 8313 3030

Indemnity Marine Assurance Company Limited
St Helen's
1 Undershaft
London
EC3P 3DQ
020 7283 7500

Insight Investment Limited
33 Old Broad Street
London
EC2M 1HZ
020 7930 5474

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International Insurance Company of Hannover Ltd.
Hannover House
Virginia Water
Surrey
U25 4AA
01344 840700

INVESCO Pensions Limited
Invesco Park
Henley On Thames
Oxfordshire
RG9 1HH
01491 417000

Investment Solutions Limited
Churchgate
1 New Road
Peterborough
PE1 1TT
01733 353600

IOMA Insurance Company (Gibraltar) Plc
Suite 2E
Eurolife Building; Corral Road
00 350 50150

Irish Life Assurance plc
Irish Life Centre
Victoria Street
St Albans
Herts
AL1 5TF
01727 848181

ISIS Managed Pension Funds Limited
Pixham End
Dorking
Surrey
RH4 1QA
0870 6083678

Just Retirement Ltd
Vale House
Roebuck Close; Bancroft Road
Reigate
Surrey
RH2 7RV
0870 909 9800

Landmark Insurance Company Ltd.
2 - 8 Altyre Road
Croydon
Surrey
CR9 2LG
020 8681 2556

Laurentian Life plc.
Barnett Way
Barnwood
Gloucester
GL4 3RZ
01452 371371

Legal & General Insurance Limited
Temple Court
11 Queen Victoria Street
London
EC4N 4TP
020 7528 6200

Liberty Mutual Insurance Europe Limited
3rd Floor
Two Minster Court
London
EC3R 7YE
020 7860 6600

Lincoln Assurance Limited
Barnett Way
Barnwood
Gloucester
GL4 3RZ
01452 371371

Link Insurance Company Limited
Suite 743b
Europort
Gibraltar
00 350 74570

Liverpool Marine and General Insurance Co. Ltd.
1 Bartholomew Lane
London
EC2N 2AB
0845 0772772

Liverpool Victoria Insurance Company Limited
Frizzell House
County Gates
Bournemouth
Dorset
BH1 2NF
01202 292333

Lloyds TSB General Insurance Limited
Tredegar Park
Newport
Gwent
NP10 8SB
01633 810666

Association of Chief Police Officers & Association of British Insurers

London & Edinburgh Insurance Company Limited
The Warren
Warren Road
Worthing
Sussex
BN14 9QD
01903 820820

London Assurance
St Mark's Court
Chart Way
Horsham
Sussex
RH12 1XL
01403 232323

London General Insurance Co Ltd
Combined House
15 Wheatfield Way
Kingston-Upon-Thames
Surrey
KT1 2PQ
020 8546 7733

London Guarantee & Reinsurance Co. Ltd.
St Marks Court
Chart way
Horsham
Sussex
RH12 1XL
01403 232323

London Life Ltd
Spectrum House
Bond Street
Bristol
BS1 3AL
0117 984 7264

Ludgate Insurance Co. Ltd.
Shepherds Oast
70 The Heath
East Malling
ME19 6JL
01732 872677

Magnus Insurance Company Limited
Ashfield House
Ashfield Road
Cheadle
Cheshire
SK8 1BB
0161 428 1444

Marine Insurance Co. Ltd.
St Mark's Court
Chart Way
Horsham
Sussex
RH12 1XL
01403 232323

Markel International Insurance Company Limited.
The Markel Building
49 Leadenhall Street
London
EC3A 2EA
020 7953 6000

Markerstudy Insurance Company Ltd
Markerstudy House
108-112 Main Road
Sundridge
Sevenoaks
TN14 6ES
01959 547300

Marks & Spencer Life Assurance Limited
Kings Meadow
Chester Business Park
Chester
CH99 9FB
0800 363420

Methodist Insurance PLC
Brazennose House West
Brazennose Street
Manchester
M2 5AS
0161 833 9696

MGM Assurance
MGM House
Heene Road
Worthing
West Sussex
BN11 2DY
01903 836067

Midland Assurance Ltd.
The Zurich Centre
3000 Parkway
Whiteley; Fareham
Hampshire
PO15 7JZ
01489 561611

Mitsui Sumitomo Insurance Company (Europe);
Limited
6th Floor
New London House
6 London Street
London
EC3R 7LP
020 7816 0321

MMA Insurance plc
Norman Place
Reading
Berkshire
RG1 8DA
0118 955 2222

Association of Chief Police Officers & Association of British Insurers

Monarch Assurance P.L.C.
61 Washway Road
Sale
Cheshire
M33 7SS
0161 905 1838

Morley Pooled Pensions Ltd
PO Box 6
25-27 Surrey Street
Norwich
NR1 3NX
01603 622200

Motors Insurance Company Ltd
Jubilee House
5 Mid Point Business Park
Thornbury
West Yorkshire
BD3 7AG
0870 752 7150

Munich Reinsurance Company
154 Fenchurch Street
London
EC3M 6JJ
020 7626 2566

Municipal General Insurance Ltd.
Friary Court
13 - 21 High Street
Guildford
Surrey
GU1 3DG
01483 303176

Municipal Mutual Insurance Ltd.
29 Buckingham Gate
London
SW1E 6NF
020 7821 6444

National Australia Life Co Ltd
PO Box 3004
Glasgow
G81 2NT
0870 6073344

National Deposit Friendly Society Limited
4/5 Worcester Road
Clifton
Bristol
BS8 3JL

National Farmers Union Mutual Insurance Society
Ltd
Tiddington Road
Stratford Upon Avon
Warwickshire
CV37 7BJ
01789 204211

National House-Building Council
Buildmark House
Chiltern Avenue
Amersham
Bucks
HP6 5AP
01494 434477

National Motor & Accident Insurance Union Ltd
4th Floor
2 Minster Court;
Mincing Lane
London
EC3R 7FB
020 7623 5280

National Provident Insurance
55 Calverley Road
Tunbridge Wells
TN1 2UE
01892 515151

National Transit Insurance Co. Ltd.
St Mark's Court
Chart Way
Horsham
West Sussex
RH12 1XL
01403 232323

National Westminster Life Assurance Limited
Trinity Quay
Avon Street
Bristol
BS99 5LJ
0117 940 4040

Nationwide Life
Kingsbridge Point
Princes Street
Swindon
Wilts
SN38 1NW
01793 513513

Navigators and General Insurance Co. Ltd.
60 St Mary Axe
London
EC3A 8JQ
01273 863400

New Hampshire Insurance Company
120 Fenchurch Street
London
EC3M 5BP
020 7626 7866

Association of Chief Police Officers & Association of British Insurers

New India Assurance Co Ltd
14 Fenchurch Ave
London
EC3M 5BS
020 7480 6626

NIG
Crown House
145 City Road
London
EC1V 1LP
020 7656 6000

Nipponkoa Insurance Company (Europe) Ltd
2nd Floor
50 Mark Lane
London
EC3R 7QH
020 7488 9899

North British and Mercantile Insurance Company
Limited
1 Undershaft
St Helen's
London
EC3P 3DQ
020 7283 7500

Northern Assurance Company Limited
1 Undershaft
St Helen's
London
EC3P 3DQ
020 7283 7500

Northern Maritime Insurance Co Ltd
St Marks Court
Chart Way
Horsham
West Sussex
RH12 1XL
01403 232323

Norwich Union Insurance
PO Box 4
Surrey Street
Norwich
NR1 3NG
01603 622200

Ocaso SA UK Branch
3rd Floor
110 Middlesex Street
London
E1 7HY
020 7377 6465

Ocean Accident and Guarantee Corporation Ltd
2 Rougier Street
York
Yorkshire
YO90 1UU
01904 628982

Ocean Marine Insurance Company Limited
2 Rougier Street
York
Yorkshire
YO90 1UU
01904 628982

Omnilife Insurance Co Ltd
14 Austin Friars
London
EC2N 2HE
020 7374 0123

Pearl Assurance plc
The Pearl Centre
Lynch Wood
Peterborough
PE2 6FY
01733 470470

Pennine Insurance Co Ltd
St Marks Court
Chart Way
Horsham
West Sussex
RH12 1XL
01403 232323

Pension Annuity Friendly Society Ltd
3rd Floor; Sackville House
143-149 Fenchurch Street
London
EC3R 6BN
0845 108 7240

Pensions Management (SWF) Ltd
15 Dalkeith Road
Edinburgh
EH16 6BU
0131 655 6000

Personal Assurance plc
John Ormond House
Milton Keynes
Buckinghamshire
MK9 3XL
01908 605000

Pharmacy Mutual Insurance Co Ltd
Arden Street
Stratford Upon Avon
Warwickshire
CV37 6WA
0800 216118

Association of Chief Police Officers & Association of British Insurers

Phoenix Assurance Ltd
New Hall Place
Old Hall Street
Liverpool
L3 9UE
0151 227 4422

Pinnacle Insurance plc
Pinnacle House
A1 Barnet Way
Borehamwood
Herts
WD6 2XX
020 8207 9000

Planet Insurance Company Limited
Eurolife Building
1 Corral Road
Gibraltar
350 49624

Platinum Re (UK) Limited
Fitzwilliam House
10 St. Mary Axe
London
EC3A 8EN
020 7220 8100

Police Mutual Assurance Society
Alexandra House
Queen Street; Lichfield
Staffordshire
WS13 6QS
01564 305205

PPP Lifetime Plc
The Lifetime Care Dept
The Axa Centre
PO Box 1810
Bristol
BS99 5SW
0845 7777543

Preferred Assurance Company Ltd
Top House
403 London Road
Camberley
Surrey
GU15 3HL
0500 546546

Primary Insurance Company Limited
43 St Stephen's Green
Dublin 2
Ireland
00353 1 678-8400

Privilege Insurance Company Limited
Privilege Wharf
Neville Street
Leeds
LS1 4AZ
0113 399 1000

Professional Risks Insurance Limited
8th Floor
1 Minister Court
London
EC3R 7AA
020 7090 1200

Professional Travel Insurance Company Limited
Suite 935
Europort; PO Box 793
Gibraltar
0035 076 047

Provident Insurance Plc
Hebble Brook Business Park
Halifax
West Yorkshire
HX2 8UL
01422 232525

Prudential Assurance Co Ltd
Laurence Pountney Hill
London
EC4R 0HH
020 7334 9000

QBE International Insurance Limited
Corn Exchange
55 Mark Lane
London
EC3R 7NE
020 7456 0000

Quinn-Direct Insurance Ltd
Dublin Road
Cavan
Co Cavan
00 353 49 436 0216

RAC Insurance Limited
RAC House
1 Forest Road
Feltham
TW13 7RR
020 8917 2748

Railway Passengers Assurance Company
PO Box 6
Surrey Street
Norwich
NR1 3NG
01603 622200

Association of Chief Police Officers & Association of British Insurers

RBS Insurance Ltd
Direct Line House
3 Edridge Road
Croydon
Surrey
CR9 1AG
0845 8785530

Reassure UK
30 St Mary Axe
London
EC3A 8EP
020 7933 3000

Refuge Assurance Plc
Royal London House
Alderley Road
Wilmslow
Cheshire
SK9 1PF
08708 506070

Reliance Mutual Insurance Society Limited
Great Hall
Mount Pleasant Road
Tunbridge Wells
Kent
TN1 1RG
01892 510033

Resolution Life Group
Juxon House
100 St Paul's Church Yard
London
EC4M 8BU
020 7489 4880

Revios Reinsurance UK Limited
50 Fenchurch Street
London
EC3M 3LE
020 7173 3200

Road Transport and General Insurance Co. Ltd.
Pitheavlis
Perth
Scotland
PH2 0NH
01738 621202

Royal & SunAlliance Insurance Group plc
Leadenhall Court
1 Leadenhall St
London
EC3V 1PP
01403 232323

Royal Exchange Assurance
One Aldgate
London
EC3N 1RE
020 7702 3109

Royal Insurance (UK) Ltd
St Mark's Court
Chart Way
Horsham
West Sussex
RH12 1XL
01403 232323

Royal Liver Assurance Limited
Royal Liver Building
Pier Head
Liverpool
Merseyside
L3 1HT
0151 236 1451

Royal London Mutual Insurance Society Ltd
55 Gracechurch Street
London
EC3V 0RL
020 7 506500

Royal National Pension Fund for Nurses
Liverpool Victoria
County Gate
Bournemouth
Sussex
BH1 2TA
0800 776677

Royal Reinsurance Co Ltd
New Hall Place
Old Hall Street
Liverpool
L3 9UE
0151 227 4422

Royal Scottish Assurance Plc
Broadstone
P O Box 17136
50 South Gyle Crescent
Edinburgh
EH12 9UZ
0131 523 8747

Sabre Insurance Company Limited
Sabre House
150 South Street
Dorking
Surrey
RH4 2YY
0870 240 5440

Saga Insurance Company Limited
57-63 Line Wall Road
01303 774804

Salvation Army General Insurance Corporation Ltd
101 Newington Causeway
London
SE1 6BN
020 7367 4770

Association of Chief Police Officers & Association of British Insurers

Save & Prosper Insurance (Overseas) Ltd
St James's House
27-34 Eastern Road
Romford
Essex
RM1 3NH
0845 300 0144

Save & Prosper Insurance Ltd
St James's House
27-34 Eastern Road
Romford
Essex
RM1 3NH
0845 300 0144

Save & Prosper Pensions Ltd
St James's House
27-34 Eastern Road
Romford
Essex
RM1 3NH
0845 300 0144

SCOR UK Company Limited
London Underwriting Centre
3 Minster Court
Mincing lane
London
EC3R 7DD
020 7375 9400

Scottish Amicable Plc
P.O. Box 25
Craigforth
Stirling
Stirlingshire
FK9 4UE
01786 448844

Scottish Boiler and General Insurance Co Ltd
Pitheavlis
Perth
Scotland
PH2 0NH
01738 621202

Scottish Equitable plc
Edinburgh Park
Edinburgh
EH12 9SE
0131 339 9191

Scottish Friendly Assurance Society Limited
Scottish Friendly House
16 Blythswood Square
Glasgow
G2 4HJ
0141 275 5000

Scottish General Insurance Co. Ltd.
Pitheavlis
Perth
Scotland
PH2 0NH
01738 621202

Scottish Legal Life Assurance Society
95 Bothwell Street
Glasgow
G2 7HY
0141 222 5000

Scottish Life Assurance Co
19 St Andrew Square
Edinburgh
EH2 1YE
0131 456 7168

Scottish Mutual Assurance Plc
Abbey National House
301 St Vincent Street
Glasgow
G2 5HN
0141 248 6321

Scottish Re Limited
Quadrant
55-57 High Street
Windsor
Berkshire
SL4 1LP
01753 858911

Scottish Widows plc
Port Hamilton
69 Morrison Street
Edinburgh
EH3 8YF
0131 655 6000

Sea Insurance Co. Ltd.
St Marks Court
Chart Way
Horsham
West Sussex
RH12 1XL
01403 232323

Selestia Investments Limited
3rd Floor
Lansdowne House
57 Berkley Square
London
W1J 6ER
01296 618700

Association of Chief Police Officers & Association of British Insurers

Service Insurance
Suite 743
Europort
Gibraltar
00 350 74570

Service Underwriting Agency Ltd
Rayford House
School Road
Hove
BN3 5HX

Shepherds Friendly Society
Shepherds House
Stockport Road
Cheadle
Cheshire
SK8 2AA
0161 428 1212

Sirius International Insurance Corporation
The London Underwriting Centre
4th Floor; Suite 12
3 Minster Court; Mincing Lane
London
EC3R 7DD
020 7469 0010

Skandia Life Assurance Co. Ltd.
Skandia House
Portland Terrace
Southampton
Hants
SO14 7AY
02380 334411

SLC Pooled Pensions Limited
75 King William Street
London
EC4N 7EH
020 7426 2626

Sompo Japan Insurance Company of Europe Ltd
Level 4
155 Bishopsgate
London
EC2M 3AY
020 7628 9599

Southern Rock Insurance Company Limited
Suite 2B Eurolife Building
1 Corral Road
Gibraltar
00 350 49083

St Andrew's Insurance PLC
St Andrew's House
Esher
Surrey
KT10 9SA
0845 300 2457

Travelers Insurance Company Limited
St Paul House
61 - 63 London Road
Redhill
Surrey
RH1 1NA
01737 787787

St. James's Place
St. James's Place House
Dollar Street
Cirencester
Gloucestershire
GL7 2AQ
01285 640302

Standard Life Assurance Company
Standard Life House
30 Lothian Road
Edinburgh
EH1 2DH
0131 225 2552

Sterling Insurance Company Limited
Westbourne House
Coolinge Lane
Folkestone
Kent
CT20 3RZ
01303 212856

Stonebridge International Insurance Ltd
3 Vere Street
London
W1G 0DG
020 7318 8484

Suffolk Life Annuities Limited
33 Lower Brook Street
Ipswich
IP4 1AQ
01473 213237

Sun Alliance and London Insurance PLC
30 Berkley Square
London
W1J 6EW
020 7636 3450

Sun Alliance Insurance International Limited
1 Bartholomew Lane
London
EC2N 2AB
0845 0772772

Association of Chief Police Officers & Association of British Insurers

Sun Life Assurance Company of Canada (UK) Ltd.
Basing View
Basingstoke
Hampshire
RG21 4DZ
01256 841414

Sun Life Assurance Society plc
107 Cheapside
London
EC2V 6DU
020 7606 7788

Swiss Life (UK) plc
Swiss Life House
24-26 South Park
Sevenoaks
Kent
TN13 1BG
01732 582000

Swiss Re International Business Insurance Co Ltd
71-77 Leadenhall Street
London
EC3A 2PQ
020 7623 3456

Tariff Reinsurances Ltd.
World Group Office
30 Berkeley Square
London
W1J 6EW
020 7636 3450

Teachers Provident Society Ltd
Tringham House
Wessex Fields
Bournemouth
Dorset
BH7 7DT
01202 435050

The Aldgate Insurance Company Limited
Montagu Pavilion
8-10 Queensway
00 350 47356

The Children's Mutual
Abbey Court
St John's Road
Tunbridge Wells
Kent
TN4 9TE
01892 515 353

Threadneedle Pensions Limited
60 Mary Axe
London
EC3A 8JQ
020 7464 5000

TIG Reinsurance Company
London Underwriting Centre
Suite 4/12
3 Minster Court
London
EC3R 7DD
020 7617 4567

Tobacco Insurance Co. Ltd.
Globe House
4 Temple Place
London
WC2R 2PG
020 7845 1384

Tokio Marine Europe Insurance Limited
150 Leadenhall Street
London
EC3V 4TE
020 7283 8844

Touchline Insurance Company Limited
2 Minster Court
Mincing Lane
London
EC3R 7FB
0870 8508510

Tradewise Insurance Company Limited
Suite 827
Europort
0035 051 801

Tradex Insurance Company Limited
Victory House
7 Selsdon Way
London
E14 9GL
020 7001 9200

Trafalgar Insurance plc
32 Cornhill
London
EC3V 3LJ
020 7626 5410

Travel & General Insurance Co. Ltd.
86 Jermyn Street
London
SW1Y 6JD
020 7930 7714

Travellers' Insurance Association Limited
St Helen's
1 Undershaft
London
EC3P 3DQ
020 7283 7500

Association of Chief Police Officers & Association of British Insurers

UBS Global Asset Management Life Ltd
21 Lombard Street
London
EC3V 9AH
020 7901 5000

UIA (Insurance) Limited
Kings Court
London Road
Stevenage
Hertfordshire
SG1 2TP
01438 761761

UK Insurance Limited
The Wharf
Nevill Street
Leeds
LS1 4AZ
0113 390 4000

Ulster Marine Insurance Co Ltd
Pitheavlis
Perth
Scotland
PH2 0NH
01738 621202

Union Marine and General Insurance Co.Ltd.
30 Berkley Square
London
W1J 6EW

United Friendly Insurance plc
Royal London House
Alderley Road
Wilmslow
Cheshire
SK9 1PF
08708 506070

United Friendly Life Assurance Limited
Royal London House
Alderley Road
Wilmslow
Cheshire
SKp 1PF
08708 506070

UNUM Provident Limited
Milton Court
Dorking
Surrey
RH4 3LZ
01306 887766

USAA Limited
7th Floor
Dashwood House
London
EC2M 1NP
020 7655 1800

W.R. Berkley Insurance (Europe); Limited
6th Floor
40 Lime Street
London
EC3M 7AW
020 7280 9000

Wesleyan Assurance Society
Colmore Circus
Birmingham
West Midlands
B4 6AR
0121 200 3003

Western Australian Insurance Co Ltd
Swan Court
Mansel Road
Wimbledon
London
SW19 9AA

Westminster Motor Insurance Association Ltd.
21 Buckingham Palace Road
London
SW1W 0PN
020 7834 3976

Whitehall Insurance Co Ltd
Economic House
25 London Road
Sittingbourne
Kent
ME10 1PE
01795 413200

Windsor Life Assurance Co. Ltd.
Windsor House
Telford Centre
Shropshire
TF3 3NB
0870 887 3333

Winterthur Life UK Limited
Winterthur Way
Basingstoke
Hampshire
RG21 6SZ
01256 470707

World Auxillary Insurance Corporation Limited
St Helen's
1 Undershaft
London

Association of Chief Police Officers & Association of British Insurers

EC3P 3DQ
020 7283 7500

XL Insurance Company Limited
XL House
34 Leadenhall Street
London
EC3A 1AX
020 79337000

Yorkshire Insurance Co Ltd
1 Undershaft
St Helen's
London
EC3P 1DQ

Zenith Insurance Plc
Suite 846-848
Europort
Gibraltar
0035 048 488

Zurich Assurance Ltd
UK Life Centre
1 Station Road
Swindon
Wiltshire
SN1 1EL
01793 514514

POLICE LIAISON DETAILS

Force	Liaison Point	Contact Details
Avon & Somerset Constabulary PO Box 37 Portishead Bristol BS20 8QJ	Data Protection Officer	Telephone 01275 816183 Fax 01275 816316
Bedfordshire Police Woburn Road Kempston Bedford MK43 9AX	Data Protection Officer	Telephone 01234 275072 Fax 01234 275076
Cambridgeshire Police Hinchingsbrooke Park Huntington PE18 8NP	Data Protection Officer	Telephone 01480 422391 Fax 01480 422378
Cheshire Constabulary Headquarters Clemonds Hey Oakmere Road Winsford Cheshire CW7 2UA	Data Protection Department	Telephone 01244 612384 Fax 01244 614133
Cheshire Police Castle Esplanade Chester CH1 2PP	Data Protection Officer	Telephone 01244 612363 Fax 01244 614133
Cleveland Constabulary PO Box 70 Ladgate Lane Middlesborough TS8 9EH	Data Protection Officer	Telephone 01642 301317 Fax 01642 301257
Cumbria Constabulary Carleton Hall Penrith CA10 2AU	Data Protection Officer	Telephone 01768 217194 Fax 01768 217134
Derbyshire Constabulary Butterley Hall Ripley Derby DE5 3RS	Data Protection Officer	Telephone 01773 572082 Fax 01773 572035
Devon & Cornwall Constabulary Middlemoor Exeter EX2 7HQ	Data Protection Officer	Telephone 01392 452371 Fax 01392 452024

Association of Chief Police Officers & Association of British Insurers

Dorset Police Winfrith Dorchester DT2 8DZ	Data Protection Officer	Telephone 01305 223929 Fax 01305 223987
Durham Constabulary Aykley Heads Durham DH1 5TT	Data Protection Officer	Telephone 0191 375 2278 Fax 0191 375 2270
Dyfed - Powys Police PO Box 99 Llangunnor Carmarthen SA31 2PF	Data Protection Officer	Telephone 01267 226466 Fax 01267 226459
Essex Police PO Box 2 Springfield Chelmsford CM2 6DA	Data Protection Officer	Telephone 01245 452523 Fax 01245 452256
Gloucestershire Constabulary Holland House Lansdown Road Cheltenham GL51 6QH	Data Protection Officer	Telephone 01242 276260 Fax 01242 221362
Greater Manchester Police PO Box 22 (S. West PDO) Chester House Boyer Street Manchester M16 0RE	Data Protection Officer	Telephone 0161 856 2532 Fax 0161 856 2535
Gwent Constabulary Croesyceiliog Cwmbran NP44 2XJ	Data Protection Officer	Telephone 01633 642209 Fax 01633 642487
Hampshire Constabulary West Hill Winchester SO22 5DB	Data Protection Officer	Telephone 01962 871014 Fax 01962 871199
Hertfordshire Constabulary Stanborough Road Welwyn Garden City SL8 6XF	Data Protection Officer	Telephone 01707 354396 Fax 01707 354349
Humberside Police Queens Gardens Kingston Upon Hull HU1 3DJ	Data Protection Officer	Telephone 01482 220836 Fax 01482 220837
Kent County Constabulary Sutton Road Maidstone ME15 9BZ	Data Protection Officer	Telephone 01622 652668 Fax 01622 652319

Association of Chief Police Officers & Association of British Insurers

Lancashire Constabulary PO Box 77 Hutton Nr Preston PR4 5SB	Data Protection Officer	Telephone 0870 046 8801 Fax 0870 046 8810
Leicestershire Constabulary St John's Enderby Leicester LE19 2BX	Information Security Manager	Telephone 0116 2485219 Fax 0116 248 5217
Lincolnshire Constabulary PO Box 999 Lincoln LN5 7PH	Data Protection Officer	Telephone 01522 558247 Fax 01522 558327
London Metropolitan Police New Scotland Yard Broadway London SW1H 0BG	Data Protection Officer	Telephone 020 7230 3291 Fax 020 7230 4586
London City of Police 26 Old Jewry London EC2R 8DJ	Data Protection Officer	Telephone 020 7601 2704 Fax 020 7601 2711
Merseyside Police PO Box 59 Liverpool L69 1JD	Data Protection Officer	Telephone 0151 777 8907 Fax 0151 777 8142
Norfolk Constabulary Falconers Chase Wymondham, Norfolk NR18 0WW	Data Protection Officer	Telephone 01953 424098 Fax 01953 424080
Northamptonshire Police Wootton Hall Northampton NN4 0JQ	Data Protection Officer	Telephone 01604 703153 Fax 01604 703148
Northumbria Police Ponteland Newcastle Upon Tyne NE20 0BL	Data Protection Officer	Telephone 01661 868305/6 Fax 01661 868988
North Wales Police Colwyn Bay LL29 8AW	Data Protection Officer	Telephone 01492 511050 Fax 01492 511013
North Yorkshire Police Newby Wiske Hall Northallerton DL7 9HA	Data Protection Officer	Telephone 01609 789139 Fax 01609 789983

Association of Chief Police Officers & Association of British Insurers

Nottinghamshire Constabulary Sherwood Lodge Arnold Nottingham NG5 8PP	Data Protection Officer	Telephone 0115 967 2565 Fax 0115 967 2549
South Wales Police Bridgend CF31 3SU	Data Protection Officer	Telephone 01656 869356 Fax 01656 869469
South Yorkshire Police Sheffield S3 8LY	Data Protection Officer	Telephone 0114 252 3238 Fax 0114 252 3105
Staffordshire Police Cannock Road Stafford ST17 0QG	Data Protection Officer	Telephone 01785 232402 Fax 01785 232463
Suffolk Constabulary Martlesham Heath Ipswich IP5 7QS	Data Protection Officer	Telephone 01473 613632 Fax 01473 611269
Surrey Police Mount Browne Sandy Lane Guildford GU3 1HG	Data Protection Officer	Telephone 01483 482875 Fax 01483 482530
Sussex Police Malling House Lewes BN7 2DZ	Data Protection Officer	Telephone 01273 404049 Fax 01273 404276
Thames Valley Kidlington Oxon OX5 2NX	Data Protection Officer	Telephone 01865 846033 Fax 01865 846424
Warwickshire Constabulary PO Box 4 Leek Wootton Warwick CV35 7QB	Data Protection Officer	Telephone 01926 415097 Fax 01926 415306
West Mercia Constabulary PO Box 55 Hindlip Hall Worcester WR3 8SP	Data Protection Officer	Tel 01905 331935 Fax 01905 331422
West Midlands PO Box 52 Lloyd House Colmore Circus Queensway Birmingham B4 6NQ	Data Protection Officer	Telephone 0121 626 5407 Fax 0121 626 5102

Association of Chief Police Officers & Association of British Insurers

West Yorkshire PO Box 9 Wakefield WF1 3QP	Data Protection Officer	Telephone 01924 292633 Fax 01924 292726
Wiltshire Constabulary London Road Devizes SN10 2DN	Data Protection Officer	Telephone 01380 729296 Fax 01380 734176
Police Service of Northern Ireland George Cross "Brooklyn", Knock Road Belfast BT5 6LE	Data Protection Officer	Telephone 02890 700057 Fax 02890 700032
States of Jersey Police PO Box 789 St Helier Jersey JE4 8ZD	Data Protection Officer	Telephone 01534 612609 Fax 01534 612577
Guernsey Police Hospital Lane St Peter Port Guernsey	Data Protection Officer	Telephone 01481 725111 Fax 01481 719483
British Transport Police PO Box 260 15 Tavistock Place London WC1H 9SJ	Data Protection Officer	Telephone 020 7830 8893 Fax 020 7830 8804
Isle of Man Constabulary Police Headquarters Glencrutchery Road Douglas Isle of Man IM2 4RG	Data Protection Officer	Telephone 01624 631212

ABI INDEMNITY

1. In consideration of the provision of information by the Police to assist insurance companies and loss adjusters which are qualifying members (as defined below) in their work, the ABI on behalf of such of its members as are notified by ABI to the ACPO from time to time (“qualifying members”), undertakes to indemnify any of the persons or any authority referred to in Para 2 below against any liability, which may be incurred by such person or authority as a direct result of the provision of such information except where liability arises out of the negligence of such a person or authority.

2. Persons who can claim the benefit of this indemnity are in respect of any participating Police Force, as follows:
 - a) Any Police Authority
 - b) The Chief Constable of any Constabulary
 - c) Any serving or former Police Officer of any Constabulary
 - d) Any serving or former staff member of any Constabulary

Signed: Date:

Name: Position:

REQUEST TO THE INSURED FOR CONSENT TO DISCLOSURE OF INFORMATION HELD BY THE POLICE

Details of Insurer

Claim No: Name:

Address:

Details of Insured

Name: Address:

.....

In order to assist with the progress of your claim, we would ask for your consent to enable us to obtain the following information from the Police / Constabulary.

Details of Crime/Lost Property

*Crime/Lost Property Reference Number:

(* delete the inapplicable as crime/lost property records kept separately)

Date and Time of report to Police:

Reporting Person:

Location of crime/loss:

The reason we need this information is:

.....

.....

Consent: I *consent / do not consent to the release of this information.

Do you wish the Police to send you a copy of their response to these questions? Yes/No*

*(The claimant should delete as appropriate)

Signed: Date:

Name:

(block capitals)

REQUEST TO THE INSURED FOR CONSENT TO DISCLOSURE OF INFORMATION HELD BY THE POLICE

Details of Insurer

Claim No: Name:

Address:

Details of Insured

Name: Address:

.....

Details of Crime

.....

.....

.....

.....

Date and Location of Crime

In order to assist with the progress of your claim, we would ask for your consent to enable us to obtain the following information from the Police / Constabulary. The information requested and the reason for seeking it is set out below.

Information Requested

Details of Crime

Crime Reference Number:

Date and Time of report to Police:.....

Aggrieved Person:

Location of Crime:.....

The reason we need this information is

.....

.....

.....

Consent: I *consent / do not consent to the release of this information.

Additional information

1. **Reasons**

.....
.....

2. **Consent:** I *consent / do not consent to the release of this information.

.....

1. **Reasons**

.....
.....

2. **Consent:** I *consent / do not consent to the release of this information.

.....

1. **Reasons**

.....
.....

2. **Consent:** I *consent / do not consent to the release of this information.

.....

Do you wish the Police to send you a duplicate copy of their response to these questions? Yes/No*
*(The claimant should delete as appropriate)

Signed: Date:

Name:
(block capitals)

**REQUEST FOR INFORMATION HELD BY THE POLICE
WHERE THERE IS EVIDENCE TO SUSPECT A
FRAUDULENT INSURANCE CLAIM**

From: (Insurer).....

Address:

To: (Constabulary)

I am making enquiries, which are concerned, with the investigation of a fraudulent insurance claim which is a criminal offence. Disclosure of information for this purpose is permitted under Section 29(3) of the Data Protection Act 1998.

Ref No:

Nature of enquiry and information requested:

.....
.....

Summary of existing evidence (to be supplemented by copies of documentation):

.....
.....
.....

I confirm that the personal data requested is required for this purpose and failure to provide the information will, in my view, be likely to prejudice my investigation.

Signed: Date:

Name:

(block capitals)

Post: Department:

Supervisory signature:

Signed: Date:

Name:

(block capitals)

Post:

Under the terms of the Information Sharing Memorandum of Understanding between the Police Service and the Insurance Industry, any further evidence of criminal conduct obtained by the Insurance Industry as a result of the disclosure requested, must be notified to the appropriate Police Force to enable that Force to consider criminal proceedings.

COPY TO BE KEPT ON FILE

DISCLOSURE OF INFORMATION TO THE INSURANCE INDUSTRY BY THE POLICE WHERE THERE IS EVIDENCE TO SUSPECT A FRAUDULENT INSURANCE CLAIM

RESTRICTED

From: (Constabulary)

To: (Insurer)

I am in possession of information which leads me to believe that this individual is intending to attempt to obtain money fraudulently through an insurance claim. I am disclosing this information for you as the Insurer to assist with this investigation and any subsequent prosecution. I confirm that if this personal data is not disclosed I will be unlikely to conclude my investigation.

This is a criminal offence and disclosure of information for this purpose is permitted under the Data Protection Act 1998, Section 29(3).

The information attached hereto is:

.....
.....
.....
.....

THIS INFORMATION SHOULD BE HELD IN CONFIDENCE AND ONLY USED FOR THE GROUNDS SET OUT ABOVE IT SHOULD NOT BE DISCLOSED WITHOUT THE CONSENT OF THE CONSTABULARY.

Signed: Date:

Name:

(block capitals)

Post: Division/Department:

Countersigned (Supervisory officer)

Signed: Date:

Name:

(block capitals)

Post:

Under the terms of the Information Sharing Memorandum of Understanding between the Police Service and the Insurance Industry, any further evidence of criminal conduct obtained by the Insurance Industry as a result of this disclosure, must be notified to the appropriate Police Force to enable that Force to consider criminal proceedings.

COPY TO BE KEPT ON FILE

GUIDANCE NOTE FOR ABI MEMBERS

Background

1. In 1978 the ACPO Crime Committee issued guidelines on the exchange of information between Police and insurers. In 1999, ABI and ACPO agreed to draft revised guidelines in recognition that the current system was not working well in practice. The joint ABI/ACPO Working Party has now agreed a set of revised guidelines, which have again been reviewed and updated in 2004. They are intended to complement the joint ABI/ACPO document "Acceptance Criteria and Guidelines for the Reporting of Suspected Fraudulent Insurance Claims to the Police".
2. The arrangements agreed in 1978 were felt to be inadequate because the Police were overwhelmed by the volume of requests for information received from insurers and loss adjusters and the administratively burdensome way in which they were made. The Police considered that in a large number of cases it was not made clear to them whether there was suspicion of crime, namely insurance fraud, leading to the request. It is in insurers' interests to build a workable protocol for requesting information from the Police so that cases where they have evidence or reasonable grounds to suspect fraud are dealt with.
3. Paragraph 2.7 of the "ACPO/ABI Guidelines On The Exchange Of Information Between The Police and Insurance Companies and Loss Adjusters" (the Guidelines), sets out that ABI will provide additional guidance to its members in respect of applying to the Police for information under the Guidelines. This Guidance Note provides that additional material.

Complying with the Guidance Note

4. ABI has agreed with ACPO that requests from insurers and loss adjusters will only be responded to by the Police if they comply with the guidance set out in this Note and the Guidelines themselves, and if requests are made by on or on behalf of the list of participating insurers at Appendix A to the Guidelines.
5. This Note refers to "insurers" but the term should be read as including loss adjusters acting on behalf of insurers. As ABI members, insurers are responsible for ensuring that loss adjusters acting on their behalf comply with the terms of the Guidelines and this Note.

Basis for requesting information

6. The Guidelines set out that there are two bases on which insurers should approach the Police for information:
 - Where there is specific reason to check a claim (section 4);
 - Where there is evidence to suspect a fraudulent insurance claim (section 5).
7. Insurers - or loss adjusters working on their behalf - who make approaches to the Police which do not comply with the Guidelines or this Note risk being deleted from the list of participating insurers at Appendix A of the Guidelines with the result that the Police will not supply any information to them or their agents.

Correspondence

8. All requests for information must be made according to the agreed format set out in the Appendices to the Guidelines. Other correspondence as a rule should be limited to supporting information sent with the appropriate form. The police will not acknowledge letters registering the insurer's interest in a particular case. Insurers are asked to keep these to a minimum and not send them as a matter of routine because many forces do not have the resources to deal with large volumes.
9. Loss adjusters will need to confirm to the Police that they are requesting information as an appointed agent of a named insurer who appears on the list at Appendix A to the Guidelines.
10. Paragraph 21 of this Note sets out that the Police also wish to be informed about the outcome of an insurer's investigations where information had been requested under section 5 of the Guidelines.

Dispute Resolution

11. Any disputes in relation to the provision of information under these guidelines should be escalated within the police force and the insurance company in an effort to resolve the issues. For example, a claims handler should refer the matter to the head of claims or claims director. Similarly, police officers should refer disputed requests to more senior officers.

Section 4 : Supply of information where there is specific reason to check a Claim

This section relates to cases where the insurer has reason to check a claim but where there is not yet enough evidence to make a reasonable decision that fraud is being attempted. A crude example might be that goods reported stolen in a burglary appear to the insurer to be well beyond the means of the claimant (eg. very expensive items of jewellery belonging to someone in a modestly paid job) and the claimant has been unable to provide any proof of ownership. In these circumstances the insurer might have reasonable grounds to make further inquiries about the claim. A Police crime report could assist the insurer's decision whether or not to settle the claim.

12. Requests under this section require the explicit consent of the insured for an approach to be made to the Police. Clearly this could make the ability to request information useless because a claimant would be extremely unlikely to give consent where they were aware that a crime report would not back up an insurance claim. To deal with this the insurer should seek the insured's consent at two stages:
 - Firstly, at proposal stage, the insured should be notified that, with the consent of the insured, the insurer might exchange information with the Police where this is needed to validate a claim;
 - Secondly, at the point of claim, explicit prior consent must be obtained before information can be requested from the Police but settlement of the claim can be made dependent on consent being given if the insured had been notified at proposal stage.
13. The insurer must satisfy themselves that true and explicit consent has been properly and appropriately obtained.

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14. All requests for information must be made in the agreed format shown at Appendix D of the Guidelines. This takes the form of a "Request To The Insured For Consent To Disclosure Of Information Held By The Police". The insured is hereby shown the Request Form which will be sent to the Police so that their consent or otherwise is explicitly obtained on the exact information about them which will be passed from the insurer to the Police. They can also indicate if they wish to see an exact duplicate of the information which is sent by the Police to the insurer in response. If the insured gives consent then the original Form D should be sent to the Police.
15. Insurers may request limited information such as the crime/lost property reference number, date and time of loss, reporting person and location of crime/loss using the form at Appendix D(a). More detailed information should be requested by asking specific questions and using the form at Appendix D(b).
16. Form D requires reasons to be given for why the information is requested. A short summary of the grounds for making a suitable check must be given so that the Police can understand that it is appropriate for them to respond. Using the example above, a reason might be, "Exceptionally valuable items claimed for, no proof of ownership supplied, sum insured is very modest." The insured will see this in advance when consent is requested.
17. Because requests for information under this section are not based upon firm evidence that a crime is being attempted, the Police will charge a fee of £75 for each request made to cover administrative costs.

Section 5 : Supply of information where there is evidence to suspect a fraudulent insurance claim

18. This section relates to cases where the insurer has evidence to support their suspicion of insurance fraud. Requests for information from the Police will be made under section 29 of the Data Protection Act 1998.
19. In these cases the explicit consent of the claimant is not required in order to request information from the Police.
20. All requests for information must be made in the agreed format shown at Appendix E of the Guidelines. The insurer will be required to summarise the evidence that they have and supply copies of supporting documentation to the Police. Requests for information are only likely to fall under section 5 of the Guidelines where the insurer has carried out some detailed investigations into a claim.
21. No fee will be charged for requests made under this section.
22. The Police have asked that where they have supplied information in response to a request under section 5 of the Guidelines, the insurer should in due course inform the Police of the outcome of their investigation and the claim. Where the insurer feels they have proven a fraud the Police should be presented with the file of evidence. Where the insurer has decided not to pursue the matter they should inform the Police accordingly.