National Infrastructure & Service Transformation Authority

To: **Pete O'Doherty**, Commissioner City of London Police, Senior Responsible Owner for the Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) Programme

From: Dame Antonia Romeo DCB, Permanent Secretary of Home Office; and

Karina Singh, Director, Function, Insight & Professions

19.05.2025

Dear Pete,

APPOINTMENT AS SENIOR RESPONSIBLE OWNER FOR THE FRAUD AND CYBER CRIME REPORTING ANALYSIS SERVICE (FCCRAS) PROGRAMME

We are writing to confirm your appointment as Senior Responsible Owner (SRO) of the Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) which took effect from 05/06/2024. This letter sets out your responsibilities and the support you can expect from your department and the National Infrastructure and Service Transformation Authority.

As SRO, you are directly accountable to the Director-General Homeland Security Group, under the oversight of the Permanent Secretary as accounting officer for the Home Office, and the Home Office Owner (Director for Economic Crime) and the Security Minister.

Your programme forms part of the Home Office Portfolio, under the oversight of the Chair of the Investment Committee (InvestCo) and is included in the Government Major Projects Portfolio (GMPP).

You have personal responsibility for the delivery of FCCRAS and will be held accountable for the delivery of its objectives, policy intent and outcomes. This encompasses securing and protecting its vision, ensuring that it is governed responsibly, reported on honestly, escalated appropriately and for influencing the context, culture, and operating environment of the programme. You are also responsible for ensuring the ongoing viability of the programme and recommending its pause or termination if appropriate. Where issues arise which you are unable to resolve, you are responsible for escalating these to InvestCo, and/or other Home Office Governance bodies as appropriate to the resolution of those issues.

You remain accountable to Ministers, as set out in the Civil Service Code, and should deliver the project in accordance with the objectives and policy intent as set by Ministers.

In addition to your internal accountabilities, SROs for GMPP projects and programmes are personally accountable to Parliamentary Select Committees. This means that, from the date of this letter, you will be held personally accountable to and could be called by Select Committees to account for and explain the decisions and actions you have taken to deliver the FCCRAS programme.

It is important to be clear that your accountability relates only to implementation, within the agreed terms in this letter; it will remain for the Minister to account for the relevant policy decisions and development.

More information on this is set out in [Giving Evidence to Select Committees - Guidance for Civil Servants](), sometimes known as the Osmotherly Rules. Information on the roles and responsibilities of the SRO are detailed in Government Project Delivery's guidance on [the role of the senior responsible owner](),

You are expected to run your programme in accordance with the [Government Functional Standard for Project Delivery](), and the requirements of [other functional standards]() as required, which is mandated for government departments and arm's length bodies to follow. You should also make yourself familiar with [The Teal Book](), Government Project Delivery's code of practice for project delivery, and any further guidance and requirements set by the Home Office's Portfolio and Project Delivery Directorate (PPD).

Time commitment and tenure

This role will require a significant amount of your time to enable effective delivery of the role and execute your responsibilities in full.

You are required to undertake this role until delivery of the FCCRAS is complete, with service go-live planned for December 2025 and continued phased implementation due to complete in early 2026. Progress towards this will be reflected in your personal objectives. Any changes to the agreed time commitment or tenure of the role, as set out above, will require both departmental and National Infrastructure and Service Transformation Authority consent.

Objectives and performance criteria

The policy intent supported by the FCCRAS Programme is to support law enforcement efforts in tackling fraud and cyber crime, and give victims the confidence to come forward, report these crimes, and know that their case will be dealt with properly. This requires a new, improved national reporting service that offers improved reporting tools and support services for victims, better intelligence to policing for investigations, and allows for greater prevention and disruption at scale.

Any proposed changes to scope which impacts on this intent or the realisation of benefits must be authorised by InvestCo and may be subject to further levels of approval.

The vision of the FCCRAS Programme is to replace the existing service for Action Fraud and the National Fraud Investigation Bureau (NFIB) and its objectives are to:

- Improve victim experience and satisfaction;
- Lead to better criminal justice outcomes;
- Prevent harm and reduce crime;
- Contribute to improved understanding of threats from serious & organised crime; and
- Improve systems inter-operability to align with national programmes.

Your personal objectives and performance criteria which relate to the programme are:

- Establish and progress the programme in line with the Home Office Programme Delivery Framework, ensuring the effectiveness of its governance, assurance and programme management arrangements, including:

  o Appointing, chairing and setting priorities for the FCCRAS Service Board and FCCRAS Executive Partnership Team;
  o Ensuring the effectiveness and performance of the programme organisation;
  o Resourcing the programme, including its PMO, to succeed;
  o Ensuring your programme's delivery, resource & financial plans are collaboratively developed, properly integrated, baselined and used;
  o Ensuring delivery plans contain sufficient contingency to properly manage expectations; and
  o Ensuring appropriate first line assurance is in place backed up by the commissioning of timely assurance and audit reviews.

- Ensure that the programme is progressed according to the Home Secretary's agreed portfolio prioritisation, recognising that under some circumstances resource may need to be diverted to higher priority programmes and discussing with the CPO's team any factors which may change the priority of your programme. In doing so, you will:
    - Ensure there is clarity about perceived constraints upon delivery as whether they are genuine constraints (such as imposed deadlines) or only desirable;
    - Keep a tight focus on the agreed scope and prevent the dilution of the programme's objectives that can result from being used as a delivery vehicle for unowned requirements; and
    - Ensure that the performance of all contracts used in the delivery of the programme is monitored with suitable qualified / experienced individuals appointed to actively manage those contracts.

- Submit the programme's business cases and other reports as appropriate to InvestCo, the IPA and HM Treasury. In doing so, you will:
    - Monitor the programme's status, its forecast timescales, costs and benefits and key risks and dependencies;
    - Report issues openly and transparently;
    - Require that the programme's resource plans allow time for the continuous professional development of all team members;
    - Ensure that the programme's business cases include sufficient funding for a properly resourced PMO and that you actively use the PMO to help you control the programme; and
    - Ensure that the programme's business cases make specific funding allocations for networks, infrastructure and cyber security, should your programme need work performed on any of these areas, base these allocations on estimates agreed with the appropriate leads in Enterprise Services, and provide the funds identified for these purposes to those leads to deliver on your behalf.

- Ensure that the programme's anticipated impacts upon business-as-usual operations are informing forecasts of those operations, including workforce planning and running costs.

- Lead the programme in a way which maximises delivery of shared corporate capabilities, for use across the Home Office and wider government.

- Ensure that Home Office data management principles are adopted in taking forward the programme to ensure that data is collected and stored in such a way as to enable sharing and reuse where appropriate, that it is protected in line with GDPR requirements.

- Set and track goals in relation to technical debt remediation, and ensure specific budgets are in place to support such goals.

- Take account of Home Office and wider government initiatives.

- Ensure that any legacy systems replaced by the programme are decommissioned as appropriate.

Extent and limit of accountability

Finance and Controls

HM Treasury spending controls will apply on the basis set out within the department's delegated authority letter. Where the programme exceeds the delegated authority set by HM Treasury, the Treasury Approval Point process will apply, and the details of each approval process must be agreed with your HM Treasury spending team. You should consult departmental finance colleagues on how to go about this.

You should note that where expenditure is considered novel, contentious, repercussive, or likely to result in costs to other parts of the public sector, HM Treasury approval will be required, regardless of whether the programme expenditure exceeds the delegated authority set by HM Treasury. If in doubt about whether approval is required you should, in the first instance, consult departmental finance colleagues before raising with the relevant HM Treasury spending team.

The overall estimated budget, resourcing requirements and tolerances for your project/programme will be agreed as part of the approval process. You will be expected to deliver within these tolerances and report quarterly on these as part of GMPP reporting.

You should operate at all times within the rules set out in Managing Public Money. In addition, you must be mindful of, and act in accordance with, the specific HM Treasury delegated limits and Cabinet Office controls relevant to the FCCRAS Programme. Information on these controls can be found here: Cabinet Office controls.

Delegated authority

You are authorised to:

- approve expenditure up to the limits granted by InvestCo plus stage tolerances described by Home Office Portfolio Change Control. Appropriate authority must be sought for expenditure which breaches tolerances. The CPO and Corporate Finance Director should be involved in such discussions along with the Director General of Corporate and Delivery. Funding – especially underspends - must not be flexed within or between allocations without reference back to InvestCo;
- agree project rescheduling within the tolerances described by Home Office Portfolio Change Control of agreed milestones, but rescheduling beyond that must be agreed with InvestCo, and the CPO should be involved in discussions seeking such agreement; and
- recommend to the Director General of Homeland Security Group and InvestCo the need to either pause or terminate the programme where necessary and in a timely manner.

These authority limits are subject to change and other conditions or tolerances may be set as part of the business case approval and ongoing monitoring processes which you should then operate within.

Where issues arise which take you outside of these authority limits which you are unable to resolve, you are responsible for escalating these issues to the Director General of Homeland Security Group and InvestCo.

Appointments

You should appoint a full-time programme director to support you in the management of this programme and make other appointments as required for the control and delivery of your programme within your delegated authority.

Governance and assurance

You should pay attention to ensuring effective governance for your programme, including the establishment of a programme board with appropriate membership and clear terms of reference.

As primary owner, you must ensure that the programme secures business case approval from InvestCo, the Cabinet Office, and HMT. You should also ensure that the programme remains aligned to the strategic outcomes, costs, timescales, and benefits in line with the approved business case as well as monitoring the context within which the programme is being delivered to ensure it remains valid.

Where a change impacts the scope, costs, benefits, or planned delivery milestones agreed as part of an agreed business case, you are responsible for following the agreed change request approval process and setting a new, approved, business case baseline.

You should ensure that an accounting officer assessment is completed alongside the approval of the Outline Business Case and that this is published on GOV.UK as part of the government's transparency requirements on major projects. You are responsible for bringing to the attention of the accounting officer any material changes in the programme which could require a new accounting officer assessment to be completed and published. Guidance on completing accounting officer assessments for major projects is available from HM Treasury.

Although you are directly accountable for this programme, you are also expected to support delivery of the department's overall strategic objectives. This means that you are expected to work collaboratively with other SROs and project directors in adjacent projects and programmes and with the Home Office's Portfolio and Project Delivery Directorate (PPD) and CPO to manage dependencies, resources, schedules, and funding to support delivery of the overall change the department needs to achieve its strategic objectives.

You should ensure that appropriate and proportionate assurance is in place and agree on the level and frequency of assurance reviews through the maintenance of an integrated assurance and approvals plan. You should develop this plan and its maintenance in collaboration with the Departmental Assurance Coordinator and the National Infrastructure and Service Transformation Authority.

Programme status, reporting and transparency requirements

The programme status at the date of your appointment is reflected in the most recent quarterly return on the FCCRAS Programme to the National Infrastructure and Service Transformation Authority, which was assessed to be Red in 24/25 Q2 GMPP reporting, and is the agreed position as you assume formal ownership of the programme.

You are responsible for ensuring the honest and timely reporting on the position of the programme to the National Infrastructure and Service Transformation Authority while it remains on the GMPP and for providing reports and information to PPD as required. Reporting should include carbon measurement, and other sustainable development goals demonstrating evidence that the project contributes to an overarching environmental strategy and is aligned with defined Net Zero pathways. Information on the FCCRAS Programme will be published annually by the National Infrastructure and Service Transformation Authority.

An accounting officer assessment has been completed and published on GOV.UK as part of the government's transparency requirements on major programmes. You are accountable for bringing to the attention of the accounting officer any material changes in the Programme which could require a new accounting officer assessment to be completed and published. Guidance on completing accounting officer assessments for major programmes is available on GOV.UK.
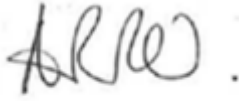
Development and support

The department will assist you in securing the necessary resources to support the programme, and will set clear guidance, requirements and standards, which align to the Government Functional Standard on Project Delivery, to enable good governance and effective delivery. You will be part of the department's cohort of major project leaders who will be expected to support each other, share good practice and lessons learned and to collectively develop solutions. You should liaise with the department's Head of Profession for project delivery to discuss the maintenance and development of your delivery and leadership skills.

The National Infrastructure and Service Transformation Authority will be available to you for support, advice, and assurance throughout the programme's time on the GMPP.

Following approval of the business case and entry onto the Home Office Portfolio, PPD will provide ongoing oversight and support and will take steps to help resolve and escalate risks, issues or constraints that are acting as a blocker to successful delivery.

We would like to take this opportunity to wish you every success in your role as SRO.

Yours sincerely,

Dame Antonia Romeo DCB

Permanent Secretary, Home Office

Karina Singh

Director, Function, Insight & Professions
National Infrastructure & Service Transformation
Authority

CONFIRMATION OF ACCEPTANCE OF APPOINTMENT

I confirm that I accept the appointment of Senior Responsible Owner for the FCCRAS Programme, including my personal accountability for implementation, as set out in the letter above.

Pete O'Doherty

Annex 1 - SRO Role and Responsibilities

The Role of the Senior Responsible Owner

You are personally accountable for ensuring the ongoing delivery of your Programme. You are responsible for securing the resources necessary for the success of the Programme and for ensuring that the related implementation and transition activities realise the agreed objectives and benefits. You will be personally accountable to Parliamentary Select Committees and be expected to explain the decisions and actions you have taken. This could include where a Minister has intervened to change the Programme during the implementation phase in a way which has implications for the cost and/or timeline of implementation. You will be able to disclose your advice about any such changes.

You must ensure the effectiveness of the governance, assurance and programme management arrangements and maintain them throughout the life of the Programme. You should adopt best practice and be prepared to justify any deviation from it, in line with the Government Functional Standard for Programme Delivery and other guidance published by the Cabinet Office.

An SRO will:

- Be a visible, engaged and active Programme leader, not a figurehead;
- Deliver the agreed outcomes and benefits;
- Create an open, honest and positive culture committed to delivering at pace;
- Challenge senior officers and Ministers when appropriate and escalate quickly;
- Provide appropriate support, steer and strategic focus to the Programme Director and ensure that they have a clear and current letter of appointment; and
- Have sufficient time, experience and the right skills to carry the full responsibilities of the role.

Specific SRO accountabilities:

Ensure that the Programme is set up for success

- Ensure that the Programme is set-up to make an unambiguous and demonstrable link to strategic policy;
- Translate this policy intent into clear deliverables which are established and agreed with senior stakeholders;
- Carry out a robust and commercially viable options appraisal, which balances risk with opportunity, as part of initial Programme feasibility;
- Establish a firm business case for the Programme during the initiation/definition phase and ensure that any planned change continues to be aligned with the business;
- Identify and secure the necessary investment for the Programme's business case (this includes both budget and operational resource);
- Design and implement robust, appropriate and transparent programme governance; and
- Build strong and effective relationships with key stakeholders, justifying their trust and retaining their confidence, and obtain their commitment to benefits realisation.

Ensure that the Programme meets its objectives and delivers the programme benefits

- Gain agreement to the programme objectives and benefits amongst stakeholders, including ministers where appropriate;
- Ensure that the Programme's anticipated impacts upon business-as-usual operations are informing forecasts of those operations, including workforce planning and running costs.
- Understand the broader government perspective and its impact on the Programme;
- Ensure the strategic fit of the programme objectives and benefits;

- Agree a clear and simple approach to performance management and monitor delivery of the objectives and benefits, taking appropriate action where necessary to ensure their successful delivery;
- Develop the programme organisation structure and plan;
- Ensure that there is a coherent organisation structure and appropriately detailed programme plan;
- Build the right team, securing necessary resources and skills and providing clear lines of accountability; and
- Provide appropriate support, steer and strategic focus to the Programme Director.

Monitor and take control of progress

- Monitor and control the progress of the Programme at a strategic level, being honest and frank about its progress, risks and issues;
- Ensure that any changes to agreed programme benefits are flagged appropriately within programme governance and that the business case is updated accordingly (throughout programme life-cycle);
- Ensure that the integrity of the Programme is maintained and speak truth to power – including to Parliamentary Select Committees; and
- Communicate effectively with senior stakeholders regarding programme progress and provide clear, appropriate and delivery-focused decisions and advice to the Programme Director.

Ensure problem resolution and referral processes are appropriate and effective

- Identify, understand and drive the successful mitigation of programme risks;
- Escalate serious issues quickly and with confidence to senior management and/or Ministers;
- Develop strong and effective engagement between the programme team and its stakeholders and sponsors;
- Ensure that communication processes are effective and that the Programme's objectives and deliverables continue to be consistent with the organisation's strategic direction;
- Ensure that the Programme is subject to suitable assurance arrangements, including reviews at appropriate stages, and that these are captured in an Integrated Assurance and Approval Plan (IAAP) that includes commercial, technical, financial and other assurance;
- Recognise the value of robust programme review and ensure it occurs at key points in the programme lifecycle, particularly at the pre-initiation (feasibility) and initiation stages;
- Make certain that any recommendations or concerns from reviews are met or addressed in a timely manner; and
- In the event of a 'red' or 'amber-red' review or a 'red' or 'amber-red' quarterly GMPP review rating, ensure that the Permanent Secretary (copying in the Chief Portfolio Officer) has been made aware of the situation and has been briefed accordingly.

Manage formal programme closure

- Formally close the Programme and ensure that the lessons learned are documented within the final evaluation report and disseminated to key stakeholders;
- Ensure that the post implementation review takes place and that the output is communicated to appropriate stakeholders;
- Ensure that arrangements for a return on investment report, including benefits realisation plans are agreed with the Portfolio and Programme Delivery Directorate (PPD); and
- Ensure a plan for both long term benefits realisation and on-going sustainability is agreed with key stakeholders as part of the process of transitioning the Programme to "business as usual".

Annex 2 - SRO Goals and Success Criteria

Business Delivery Goal

Description
As SRO for FCCRAS, I will carry out my role in accordance with my letter of appointment. I will achieve this goal by creating high performance in programme delivery covering the outcomes and scope agreed with Investment Committee (InvestCo) to the time and cost / benefits plans last baselined with InvestCo to deliver FCCARS, the replacement service for the underperforming Action Fraud, a critical component of the Fraud Strategy, and those requirements and constraints outlined in my SRO appointment letter.

I will establish / maintain a culture of learning, collaboration and transparency across the Programme and with dependent stakeholders, in particular transparency of performance i.e. when performance / standards have and or have/will not be achieved, or where assistance / interventions are required. I will build a programme team that has strong project and programme delivery skills, including a capable PMO that provides the data, information and insight required to inform decision making and to make the necessary interventions, underpinned by appropriate governance structures and change control mechanisms. I will ensure compliance with the Home Office Programme Delivery Framework and address any identified gaps in performance or development to ensure compliance.

Success Criteria
  • Programme performance regarding time (schedule and milestones), scope, cost (financial forecasts) and benefits, including the management of identified dis-benefits. Performance data / feedback will be supplied from PPD / CPO / HoP.

  • Actual time commitment and review against that.

  • Programme's consistent application of Microsoft Programme Online standards and compliance with the Home Office Programme Delivery Framework – compliance reports supplied by PPD and any gaps addressed / rectified.

  • Feedback from the IPA in relation to formal quarterly reporting and any actions / recommendations.

  • Quality and timeliness of actions in response to assurance and audit recommendations.

  • Evidence of analysing, collecting and sharing of Lessons Learned across the Programme and wider Portfolio / sub-Portfolios.

  • Evidence of creating a psychologically safe and inclusive environment for programme team members by role modelling curiosity, acknowledging own fallibility, and framing work as an opportunity to learn and develop.

  • Management and evidence of programme resourcing risks / issues and recruitment and staff deployment activity has been undertaken to address capacity gaps across the Programme, and includes adherence to workforce and recruitment controls, as set out in relevant delegation letters.

Corporate Contribution Goal

Description
As SRO for FCCRAS, I will support the Home Office Sponsor and Project Delivery community through the provision of support, advice and guidance to other SROs and/or, as required, to staff developing their skills, knowledge and experience to become future SROs.

Success Criteria
  • Proactively looking out for my SRO colleagues, creating space for the community to be open about the challenges faced, and pulling together as one community.

- Volume and quality of interaction and support across the SRO community, e.g. assist knowledge and skills gaps - specific upskilling interventions made and the impact – feedback from colleagues and the PPD / CPO / HoP (feedback supplied)
    - attendance / interaction, e.g. PPD-led SRO events and IPA-led activity,
    - sharing Lessons Learned with other SROs/the wider Programme Delivery Community.

- Awareness of the wider operating and Portfolio environment and supporting the wider project delivery community to adjust to priorities and the unforeseen, including proactive reprioritisation of work and resource, and collaborating across boundaries to seek out expertise and experience of others.