

COUNTER FRAUD ANNUAL REPORT TO AUDIT COMMITTEE: 2024/25

1st April 2025



HILLINGDON
LONDON

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1. INTRODUCTION

1.1 The Role of the Counter Fraud Team

- 1.1.1 The Counter Fraud Team (CFT) supports the Council in meeting its statutory responsibility under section 151 of the Local Government Act 1972 for the prevention and detection of fraud and corruption. The work of the CFT underpins the Council's commitment to a zero tolerance approach to fraud, bribery, corruption and other irregularities, including any money laundering activity.
- 1.1.2 As well as counter fraud activity, the CFT also conduct a range of other types of investigative work which do not necessarily have a criminal element to them i.e. revenue inspections, disciplinary investigations, etc. There is also a range of preventative work that the team is responsible for carrying out, such as fraud awareness training and ensuring the Council have up-to-date and appropriate corporate investigation policies and procedures. The CFT also leads on the Council's assessment of the risk of fraud and corruption across all council services.

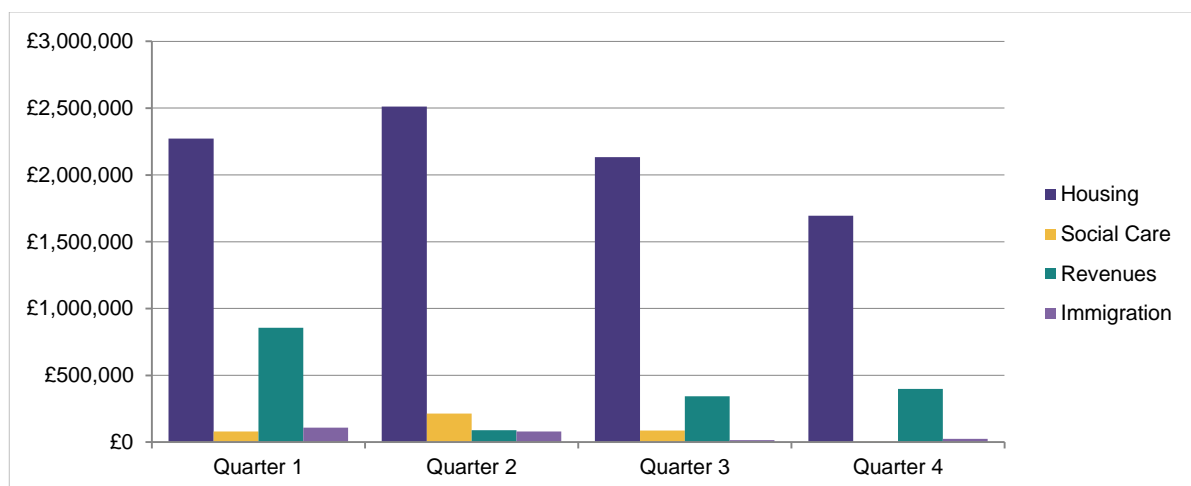
1.2 The Purpose of the Counter Fraud Annual Report

- 1.2.1 The Counter Fraud Annual Report 2024/25 provides the Council's Corporate Management Team (CMT) and the Audit Committee with information on the counter fraud work carried out during 2024/25. It summarises for CMT and the Audit Committee the key findings from the quarterly progress reports presented during the year. In addition, it provides an opportunity for the Head of Counter Fraud (HCF) to highlight any significant issues arising from the counter fraud work in 2024/25.
- 1.2.2 The Annual Report also highlights to CMT, the Audit Committee and other key stakeholders, the performance of the CFT in meeting its strategic and operational objectives (as set out in the Counter Fraud Strategy 2022 to 2025 and The Annual Operational Plan), which provides an opportunity for the HCF to be held to account in this respect.

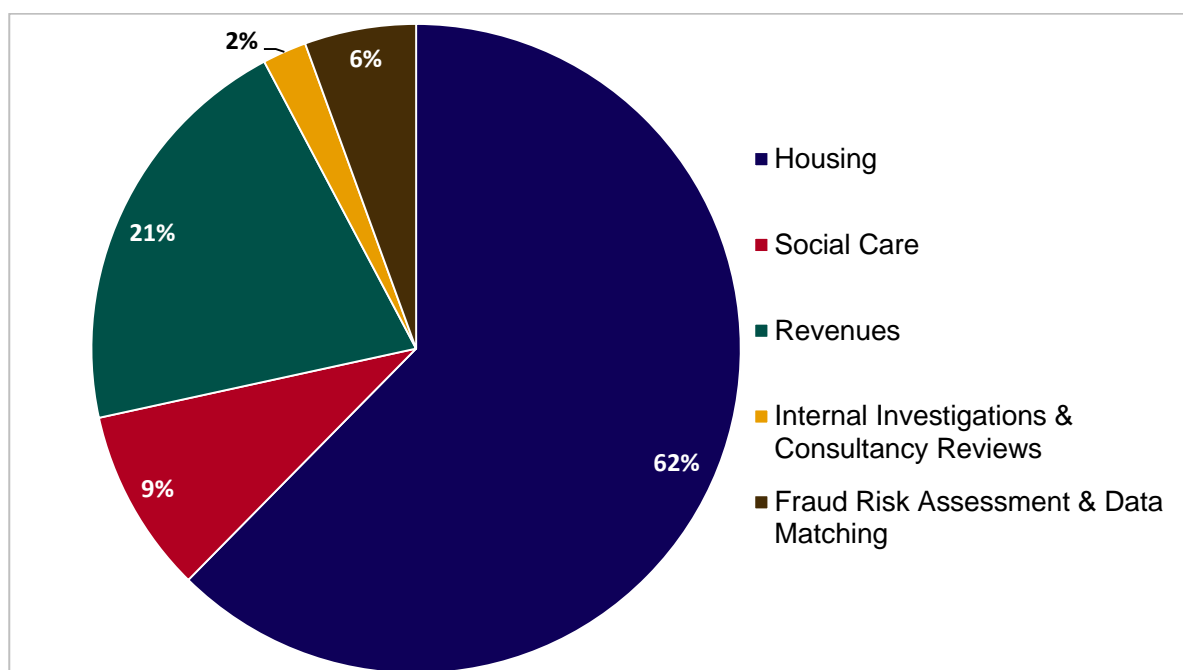
2. EXECUTIVE SUMMARY

- 2.1 The challenges faced by the public sector and in particular Local Authorities have been ever present in 2024/25. The current economic climate has created an environment where front line services have seen an unprecedented demand for support which in turn creates an opportunity for fraud to occur. However, through top level commitment the CFT is well resourced and placed across high fraud risk areas. **This approach has led the team to delivering c£10.9m of savings in 2024/25.**
- 2.2 Following on from the success of the CFT winning the outstanding fraud prevention, detection and recovery award and the Grand Prix Award at Public Finance 2023. The CFT management team entered the service into the Public Sector Fraud Awards 2025 for Local Excellence. In addition, Laura Piggott Counter Fraud Manager for Tenancy Fraud was also nominated for Female Pioneer of the Year for her fight against Tenancy Fraud. Both the team and Laura were shortlisted for the awards. Though unfortunately neither won in their respected categories, it is testament to where the team is in its journey in protecting the public purse.
- 2.3 In Q4 of 2024/25 the team have been through a small-scale restructure to realign its focus on high-risk areas of fraud. Some low-risk fraud activity has been transferred back to services and new areas of work have been added to the 2025/26 operational Workplan. This has led to a small reduction in resources (2.0 FTE). However, with the use of data, technology and digital processes coupled with a focused approach the HCF is confident that the CFT will deliver against its strategic objectives in 2025/26.

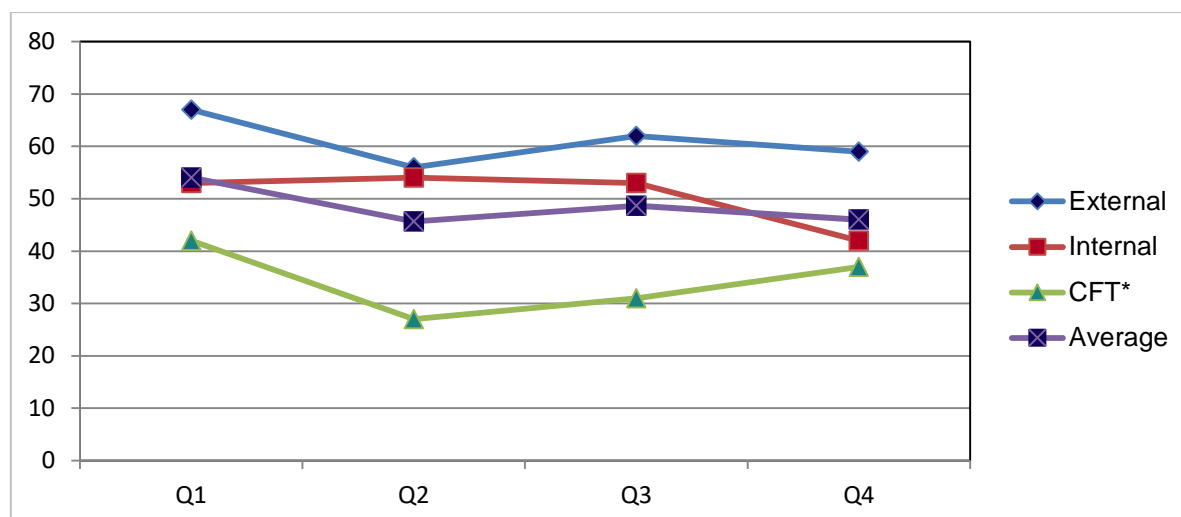
- 2.4 Housing fraud, in particular tenancy fraud, has remained the highest fraud risk to the Council and an area of focus for the CFT, with the team conducting civil and criminal investigations into suspected cases of housing fraud, alongside proactive loss prevention projects. This has achieved overall **loss prevention savings of c£7.8m** in 24/25. These savings included the **recovery of 112 Council properties** due to tenancy fraud, this represents an **8% increase** on the previous year's outcomes (23/24). The increase represents the highest property recovery achieved in a single year.
- 2.5 With the cost-of-living crisis Housing services have seen a significant rise in those requiring support due to homelessness over recent years. This has led to increased numbers currently in emergency accommodation. This increased demand presents the Council with a higher risk of fraud. The CFT currently have a secondee from Housing to residency check all emergency accommodation to highlight any occurrences of non-occupation or subletting. **In total 39 cases of accommodation placements were cancelled saving c£745k.** With this additional resource demonstrating significant loss prevention savings and a high return on investment, a permanent staffing solution will be sort in 25/26.
- 2.6 The CFT has focused its efforts into improving its coverage and activity within Social Care in 2023/24. In total **c£380k of financial savings have been identified**, demonstrating an **increase of 21%** on the previous year's outcomes. Though this demonstrates a positive move in the direction of travel in combating social care fraud, the HCF believes more can be done. Additional activity in the areas of direct payments and commissioned care are now built into the 25/26 work plan.
- 2.7 In the area of **Revenues**, the team has delivered **6,861 inspection visits** during 2024/25, which is a **0.5% increase** from 2023/24. The team has prioritised its work in areas that maximise revenue for the Council. This effective way of working has led to the **CFT to generating c£1.4m in additional business rates billings**. In 25/26 the team will continue this approach whilst also reviewing and improving processes using technology and digital solutions. This in turn will create greater capacity to increase revenue.
- 2.8 The CFT has operated with a **Home Office Onsite Immigration Official (OSIO)** integrated within the Counter Fraud Team since 2018. The OSIO supports the Council in decision making for those that require assistance for Housing or Social Care by providing real-time Home Office data. **In 2024/25 the OSIO contributed savings of c£226k to the overall counter fraud financial target.**
- 2.9 The CFT has continued to carry out focused proactive projects as part of its strategic approach to tackle fraud in the Council's highest risk areas. These areas are considered to be susceptible to fraud and financial loss. Per the table at **Appendix C** the CFT conducted **8** proactive projects in 2024/25. The proactive drives provide assurance across the Council and highlights, where needed, any further preventative measures.
- 2.10 Part of the CFT's remit is to create awareness internally and externally of fraud including promoting positive outcomes from its work. Across 24/25 the team has worked closely with the Communications Team to educate on the risk of fraud, how to report fraud and share some of the successes of the CFT. **Appendix F** showcases some of the media work delivered in 24/25.
- 2.11 **Chart 1** over the page, summarises the areas in which the CFT has achieved loss prevention savings (cost reductions) in 2024/25 by each quarter. The majority of loss prevention savings have been achieved by the CFT within Housing due to the team's work in tenancy fraud. A full breakdown of all CFT loss prevention savings can be found at **Appendix A**.

Chart 1 - CFT Loss Prevention Savings Achieved in 2024/25

- 2.12 **Chart 2** below summarises the allocation of CFT resource in 2024/25. Similar to previous years, the team has spent the majority of its time working within the area of Housing. The resourcing and time spent in Housing has increased by 11% compared to 23/24. This has directly correlated with the increase in tenancy fraud outcomes.

Chart 2 - CFT Allocated Resource in 2024/25

- 2.13 In 2024/25 the CFT received **a total of 584 referrals for investigation** from both internal and external sources (compared to 634 in 2023/24). **Chart 3** provides a summary of the trend in referrals over the year.
- 2.14 Though referrals have **decreased by 8%**, outcomes have remained in line with previous years. The HCF and management will plan another year of fraud awareness and engagement to create an anti-fraud culture and increase referrals in areas of high risk.

Chart 3 - Number of 2024/25 Referrals by Quarter

*Referrals generated through CFT proactive projects or data matching exercises

3. ANALYSIS OF COUNTER FRAUD ACTIVITY IN 2024/25

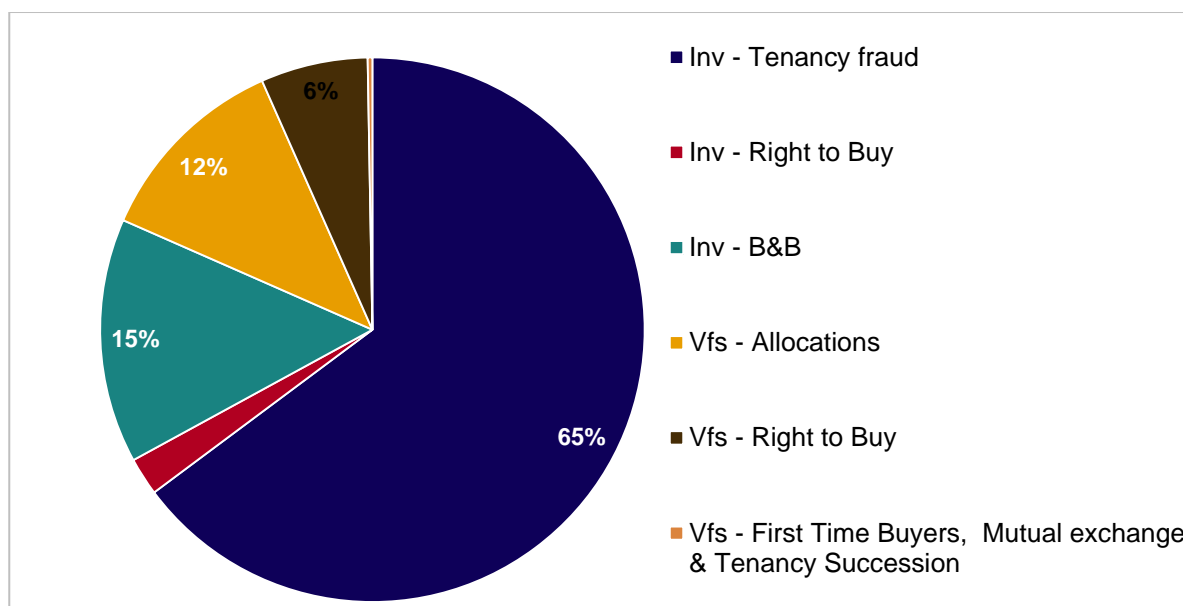
3.1 This section provides a more detailed analysis of the activities of the CFT during 2024/25, detailing specific work streams and the trends within each area for comparison and contrast. The activities of the CFT were predominantly focused on three main fraud areas of work: **Housing, Social Care and Revenues**. The CFT also conducted proactive **Blue Badge** operations during the year as well as investigating allegations of Blue Badge misuse.

3.2 Housing Fraud

3.2.1 Throughout 2024/25 tenancy fraud investigations, housing verifications and proactive project work in homelessness and tenancy management has continued to be the key areas of work for the CFT. The CFT continues to proactively identify and investigate instances of tenancy fraud. This combined approach has enabled the team to deliver effective loss prevention savings and recover a substantial amount of Council properties. The CFT has also continued to provide assurance to key stakeholders by undertaking verification checks in a variety of different areas, ensuring the applicants' eligibility for housing services are properly verified prior to being offered a tenancy. This provides assurance to key stakeholders that the risk of fraud in this area is being managed effectively.

3.2.2 During the year the Counter Fraud Management Team worked closely with stakeholders in Housing to improve the counter fraud culture and provide tailored support. Management provided guidance on potential fraudulent cases and interviewed clients in conjunction with housing staff to provide learning opportunities and demonstrate first hand interviewing techniques. This close support from the CFT has given housing staff the tools and confidence to challenge suspected fraudulent applications and work proactively in reducing the fraud risks within temporary accommodation. Though this work has taken place the HCF believes more can be done to ensure frontline staff are equipped and able to challenge fraudulent cases from the outset.

3.2.3 As per **Chart 4** over the page, most of the counter fraud activity that was conducted within housing is heavily focussed on tenancy fraud investigations which correlates to the increased outcomes in this area.

Chart 4 - CFT Work Within Housing Services in 2024/25

3.2.4 Per **Table 1** below, in 2024/25 the CFT successfully recovered an outstanding **112 Council properties**. This is an **8% increase on outcomes** from 2023/24 and represents the highest property recovery figure ever achieved by the CFT for the third consecutive year. The increased risk of tenancy fraud from the cost-of-living crisis, combined with the improvement in data matching, and the effective processing of investigations by the CFT has contributed to this success.

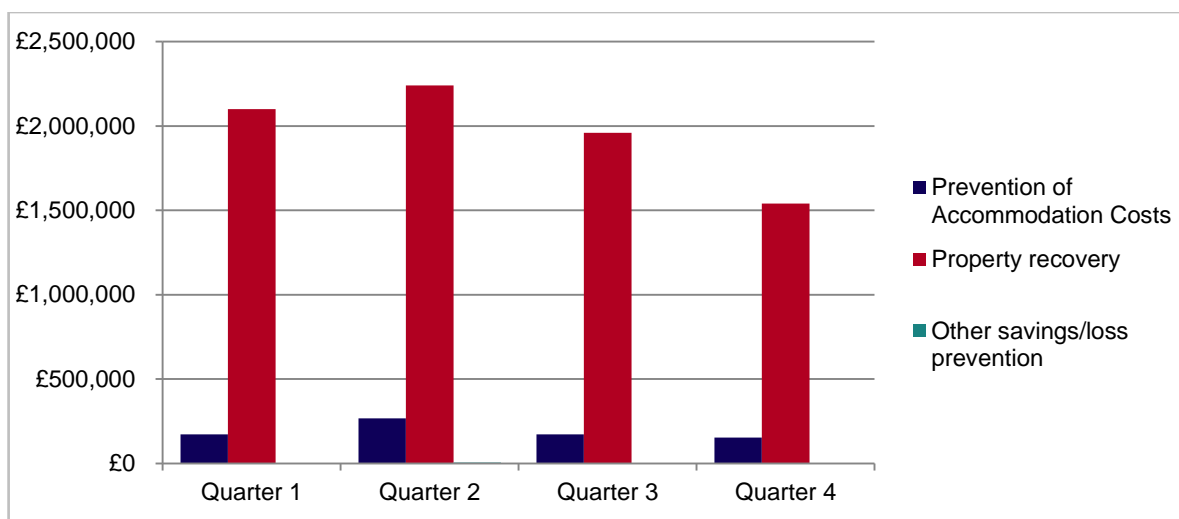
Table 1 ~ Housing Tenancy Fraud Cases

Housing Tenancy Fraud	2024/25		2023/24		2022/23	
	Cases	£k/value*	Cases	£k/value	Cases	£k/value
Total number of recovered properties	112	£7,840k	103	£5,768k	84	£4,704k

*Calculated using the new Tenancy Fraud Forum valuation.

3.2.5 **Chart 5** (over the page) summarises the loss prevention outcomes of the team by area of counter fraud activity within Housing. The team's high levels of property recovery have contributed to the majority of the savings. In addition, **the CFT identified and closed 39 emergency accommodation placements saving c£745k**. With the ongoing success of uncovering fraud within emergency accommodation the CFT will continue to allocate resources into the rolling visiting project for 2025/26.

3.2.6 In 2024/25 the CFT continued to carry out verifications as part of the housing allocations process. As per **Table 2** over the page, 1191 housing cases were processed for verification. These enhanced checks give assurance to management that housing applicants are genuine, entitled to be housed prior to allocation and highlight potential fraudulent applications for further investigation.

Chart 5 - CFT Loss Prevention Outcomes in Housing 2024/25

3.2.7 Of the **1191 housing verifications** carried out in 2024/25, the CFT identified **21% for rejection**, including the closure of **30 applications**. There are various reasons for a verification to be rejected or closed, and these include significant rent or Council Tax arrears, property ownership, no immigration status, or misrepresentation of circumstances. With a high demand for social housing assistance these checks continue to demonstrate their importance, as applicants may have been successful in obtaining a council property that they were not entitled to.

Table 2 ~ Housing Tenancy Verification Cases 2024/25

Housing Tenancy Verification Cases	Q1	Q2	Q3	Q4	Total
Total number of cases reviewed	281	376	286	248	1191
% Identified by CFT for rejection	30%	19%	17%	19%	21%
Total number of applications closed	5	6	8	11	30

3.3 Revenues

3.3.1 The CFT carries out **inspections of businesses and domestic properties in the borough**, Council Tax exemptions and discounts (such as SPD) and data matching work through the National Fraud Initiative (NFI), as well as maximising revenue through the identification of Beds in Sheds/Annexes. The work of the CFT aims to improve efficiency and increases productivity by applying proven effective visiting processes and investigative techniques to maximise revenue. This ensures that Business Rates and Council Tax are correctly applied to all properties, including business premises and new-build properties.

3.3.2 **Table 3** over the page, outlines the performance of the Revenues Inspection function against the previous year. The CFT has maintained its performance against the KPI, providing an effective and efficient service. The volume of inspections has remained largely stable allowing the team to remain focused in its approach of prioritising income generation through the Revenues Maximisation project.

Table 3 ~ Revenues Inspections Performance 2024/25

Revenues Inspections	2024/25	2023/24	Improvement
Total number of inspections completed	6,861	6,829	+32 / + 0.5%
Percentage within 10 day target	99%	99%	N/A

3.3.3 The CFT continued to proactively identify Beds in Sheds within the borough and a **total of 86 unregistered dwellings** during the year have been added to the Council Tax list. These previously unlisted properties resulted in **loss prevention savings of c£89k through additional council tax billing**. The identification of Beds in Sheds will continue to be a priority for the CFT with further work planned for 2025/26.

3.4 Revenue Maximisation

3.4.1 The continued focus on areas of loss prevention within NNDR has proven to be highly successful. The team have maintained its activity in this area identifying unknown businesses for ratings or those businesses that should have an increased RV through its own proactive projects and working with suppliers. **This has led to billings being issued to businesses to the value of c£1.4m** with the Council retaining 15% under the business rates retention model. This area of work highlighted the benefits of utilising data and using investigative practices to support inspections.

3.4.2 With positive financial outcomes across three financial years, the CFT will seek Cabinet Member approval for continued funding in this area for the next 2 years.

3.5 National Fraud Initiative

3.5.1 The National Fraud Initiative (NFI) is a bi-annual data matching exercise overseen by the Cabinet Office. Results from the NFI matching were received at the end of Q3 2024/25 with work commencing immediately to review this work stream.

3.5.2 The initial review of the NFI matches has provided significant outcomes in Q4 2024/25, including:

- **47 Housing register applications** being closed where the applicant's circumstances had changed, and they no longer qualified for housing support
- **181 Disabled parking badges being cancelled** where the Council had not been notified the badge holder had passed away
- **29 Resident parking permits being cancelled** where the Council had not been notified the permit holder had passed away.

3.5.3 There are four ongoing investigations where the NFI matching has identified suspicion of polygamous working with council employees being linked to multiple authorities.

3.5.4 Work will continue to review the NFI matching during 2025/26 with additional outcomes and savings expected throughout the year.

3.5.5 The NFI also produces an annual review of Council Tax Single Person Discount claims which are matched against Electoral Roll records which identified savings of **£108,077.09** during 2024/25. Matches for the new financial year were received during Q4 and are being reviewed.

- 3.5.6 The CFT is recognised as a leading member of the NFI backed **London Counter Fraud Hub (LCFH)** which aims to proactively identify instances of cross borough fraud and loss and to provide access to regularly updated data from other public sector bodies.
- 3.5.7 During 2024/25 the LCFH has provided fortnightly data matching between council tenancy records and death registration information. This has identified **33 properties** where the council was unaware of the death of the tenant, and which has led to the properties being recovered and returned to use earlier and more efficiently than would otherwise be the case. This has provided a notional financial saving of **£2,310,000**.

3.6 Blue Badge Fraud

- 3.6.1 The 2024/25 financial period marked the **CFT's most successful year** for supporting disabled motorists and protecting the blue badge scheme. Working collaboratively with the Metropolitan Police in tackling known hot spot areas and the team's participation in the National Blue Badge Day of Action, a total **18 offenders were put before the courts with c£7k in fines and costs** being issued.
- 3.6.2 The team's commitment in ensuring that Blue Badge holders could continue to access the parking facilities on offer across the borough was further demonstrated with the launch of the team's **first ever Blue Badge amnesty**. This heavily advertised campaign allowed for badges that should not have been in circulation returned to the Council without the fear of repercussions. This innovative approach led to the return of **14 badges and removed** the potential for any instances of future misuse occurring.

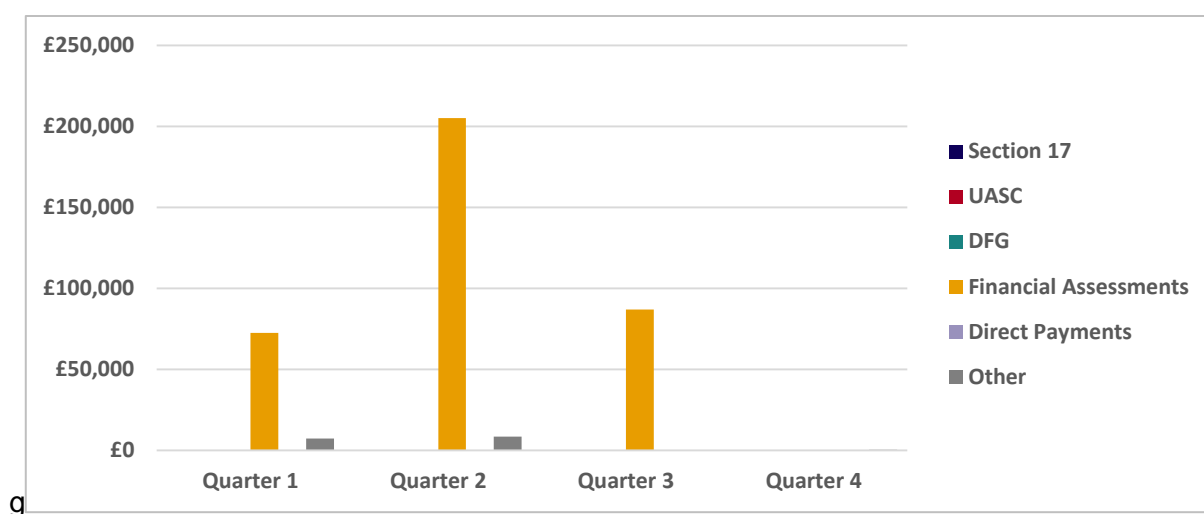
3.7 Social Care

- 3.7.1 During the year the CFT have continued to deploy resources to tackle fraud across various areas within Social Care. The team's approach has been to work proactively and reactively to reduce the Council's exposure to fraud in areas that pose considerable financial risk. The steps taken have enabled the team to cover vast areas within both adults and children's social care.
- 3.7.2 The proactive approach taken by the team within Financial Assessments, has seen over 630 verifications processed in-order to highlight instances where service users have misrepresented their circumstance or failed to disclose information as part of the financial assessment process. In total, 23 cases of suspected fraud have been investigated with these cases achieving **c£364k in loss prevention savings**. The team have seen year on year improvements in this area with the 2024/25 period marking the **team's most successful year** since the process was introduced and a remarkable **130% increase in reported financial outcomes for the same period last year**.
- 3.7.3 Over the course of 2024/25 CF received a number of referrals regarding the Homes for Ukraine Scheme. This government initiative allows individuals and organisations to offer accommodation to Ukrainians fleeing the war in Ukraine. As part of the scheme hosts accommodating those effected by the war are entitled to thank you payments. As a direct result of referrals received, CF identified two instances where overpayments had been made to hosts despite individuals having left the accommodation provided and achieved **loss prevention saving of c£1,700**.
- 3.7.4 Working collaboratively with both the Travel Assistance and SEN team, CF conducted its first investigation relating to personal transport budgets following concerns raised that travel assistance had been provided to an ineligible applicant. Travel assistance is provided to applicants to provide support with meeting school transportation costs. This cross-service investigation identified that travel assistance had been provided when the applicant was not entitled to support, this **resulted in c£6k in savings**.

3.7.5 Utilising the team's investigative capabilities a number of enquiries to trace debtors on behalf of the Corporate Collections Team were carried out over the 2024/25 period. Whilst these cases don't have a criminal element they do pose a financial risk to the Council. Deploying counter fraud resources debtor's whereabouts were established and **savings of c£8k achieved**.

3.7.6 **Chart 6** below, summarises the loss prevention outcomes of the team for the work carried out within Social Care. Over the course of 2024/25 the CFT has continued to raise its profile within these services and engage positively with stakeholders, which has **delivered loss prevention savings of c£380k**. The HCF notes that some areas of fraud risk have low outcomes. To address this, proactive project work for 25/26 has been added to the work programme.

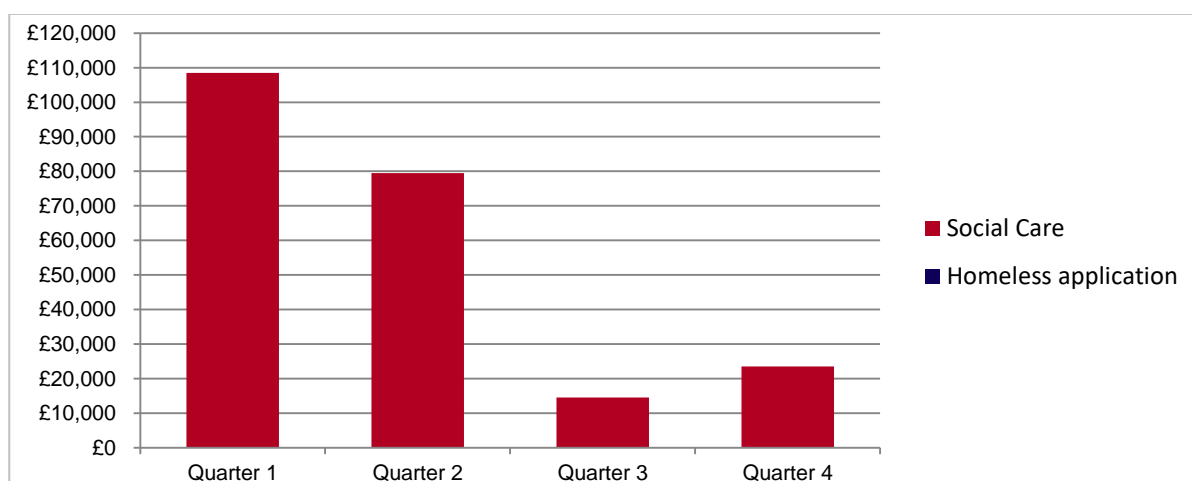
Chart 6 - CFT Loss Prevention Outcomes in Social Care 2024/25



3.8 Onsite Immigration Officer (OSIO)

3.8.1 **Chart 7** below, summarises the outcomes for the work of the OSIO within 2024/25. This is based on prudent cost estimates to the Council which are linked to immigration enquiries where the OSIO has been able to access Home Office databases and effectively communicated information derived from these to key council service areas. The total value of the OSIO work for 2024/25 is estimated at **c£226k**.

Chart 7 - OSIO Loss Prevention Outcomes 2024/25



3.9 Fraud Awareness Campaign

- 3.9.1 The CFT has continued to **embed an effective counter fraud culture** within the Council. A total of **9 Fraud Awareness sessions** were conducted over the course of the year. Each presentation was tailored to incorporate the different fraud risks encountered by each service area. These sessions give officers the tools to spot and report fraud, whilst encouraging them to champion a counter fraud culture organisation wide. One session was provided to local residents at Oak Farm Library helping to raise awareness of the work of CFT with the wider public and to provide general fraud prevention advice.
- 3.9.2 The Council's various social media platforms have been utilised by the CFT to raise awareness of the different types of fraud and scams that had become prevalent over the course of the year, as well as fraud risks and team outcomes. Tweets and online posts were shared to encourage residents to report suspected instances of fraud. Examples of the CFT's media campaign can be found in **Appendix F**. There has been a notable correlation between the quality and quantity of referrals following on from the Fraud Awareness campaign.

4. ANALYSIS OF THE COUNTER FRAUD TEAM PERFORMANCE 2024/25

- 4.1 The CFT introduced a suite of KPIs in 2018/19 which were agreed and implemented in liaison with CMT and the Audit Committee. The KPIs allow effective measurement of performance and enable the team and the HCF to be better held to account by CMT and Audit Committee. The table at **Appendix B** sets out the performance by the CFT against the KPIs throughout 2024/25 by quarter and previous years.
- 4.2 As illustrated in **Appendix B**, performance against KPIs has remained consistent throughout the financial year. The team has also **achieved 9 of the 9 KPI targets** which is a considerable achievement. The team's overall performance can be attributed to the management information available and the management team's engagement with staff around performance.
- 4.3 The table at **Appendix A** provides a detailed breakdown of the loss prevention performance of the Counter Fraud Team during 2024/25. The table highlights the **increase in Housing outcomes** mainly around property recovery.
- 4.4 During 2024/25 the CFT has actively sought to obtain data from each London Borough relating to counter fraud activity and produced benchmarking information which is set out at **Appendix D**. This data relates to reported figures in counter fraud annual reports to oversight committees for 2023/24. There is a significant inconsistency between authorities in terms of what they each report to their oversight committees and the variation in values they each place on individual activities. As a result, this makes comparison between authorities in terms of individual counter fraud work areas difficult to quantify.
- 4.5 Nevertheless, there are several areas of general commonality (as set out in **Appendix D**), including the performance on housing fraud and Blue Badge which are present across most London Boroughs.

5. FORWARD LOOK 2025/26

- 5.1 Looking ahead to 2025/26, the CFT as part of the Council's Counter Fraud Strategy 2025-28 will continue to develop its risk-based approach, focusing on the areas of highest fraud risk within services. Key to this is the continued engagement with service areas on fraud risk and controls to support and underpin the Council's "Fraud Universe" which steers the CFT Annual Operational Work Plan.
- 5.2 Moving ahead, there are a number of key priorities for the CFT. These include:

- **Implementation of the Counter Fraud Annual Operational Work Plan 2025/26**, with a full and ongoing reassessment of the fraud risk profile of the Council to ensure the CFT adapts to any emerging risks;
- To continue to embed a counter fraud culture across the Council through a successful **programme of Fraud Awareness**, alongside engagement with key stakeholders regarding fraud issues internally and externally;
- **Review and improve all processes** to ensure the team is efficient, effective and modernised through technology and digitalisation. This improvement programme started at the end of 24/25 with the aim of removing paper from all counter fraud activity.
- Maintain performance with suppliers to identify businesses that are not listed for ratings through our **Revenues Maximisation Project**, to increase the NNDR collectable by the Council, using open-source data and intelligence gathering;
- **Sustain the level of performance the team achieved in the last 3 years into 25/26**, by focusing on our strategic objectives, KPIs and the financial loss prevention target by deploying a risk based approach to fraud;
- Continue to work closely with **Housing key stakeholders around the increased risk of fraud**, with the view to conduct further proactive and reactive counter fraud activity in this area; and
- **Increase reach and activity across Social Care** to support the protection of budgets through reactive and proactive activity.

5.3 The CFT would like to take this opportunity to formally record its thanks for the co-operation and support it has received from the management and staff of the Council, CMT and the Audit Committee during 2024/25.

Alex Brown APCIP
Head of Counter Fraud
1st April 2025

APPENDIX A: CFT Loss Prevention Performance 2024/25

Work Area	Description	Quarter 1	Quarter 2	Quarter 3	Quarter 4	2024/25
Housing	Right to Buy discounts	£0	£0	£0	£0	£0
	Property Recovery (notional savings)	£2,100,000	£2,240,000	£1,960,000	£1,540,000	£7,840,000
	Other savings/loss prevention	£172,171	£272,844	£173,054	£153,922	£771,992
Social Care	Section 17 and UASC*	£0	£0	£0	£0	£0
	Financial Assessments	£72,585	£205,112	£86,840	£0	£364,537
	SGO	£0	£0	£0	£0	£0
	Direct Payments	£0	£0	£0	£0	£0
	Other	£7,290	£8,415	£0	£429	£16,135
Revenues	Single Person Discount	£22,527	£40,497	£16,120	£44,786	£123,931
	Council Tax Reduction & arrears	£4,551	£4,027	£15,772	£6,131	£30,482
	Unlisted Buildings	£31,758	£21,817	£25,256	£10,291	£89,123
	Housing Benefit Overpayments	£12,750	£18,648	£17,831	£16,065	£65,294
	NNDR**	£784,844	£4,492	£267,514	£320,284	£1,377,134
Blue Badge	Simple Caution & Financial Penalty	£2,512	£2,258	£731	£1,900	£7,401
Immigration Officer	Housing Homelessness Applications*	£0	£0	£0	£0	£0
	Social Care Savings	£108,480	£79,514	£14,560	£23,851	£226,405
Totals	Loss Prevention Savings	£360,196	£560,351	£273,241	£177,028	£1,370,817
	Notional Savings	£2,779,867	£2,262,466	£2,205,218	£1,828,306	£9,075,858
	Cashable Savings	£176,892	£72,551	£98,490	£110,425	£458,358
	Costs awarded and penalties	£2,512	£2,258	£731	£1,900	£7,401
	Total	£3,319,467	£2,897,626	£2,577,681	£2,117,659	£10,912,434

* Average weekly cost against average length of support. This figure fluctuates but has been provided by the Council's Business Performance Team.

** NNDR operates under a business rates retention model with the Council keeping 15% of income.

APPENDIX B: KPIs and Actual Performance 2024/25

CFT KPIs	Target	Q1	Q2	Q3	Q4	24/25	23/24
1. Percentage of fraud referrals risk assessed within 3 working days	95%	100%	99%	100%	99%	99%	99%
2. Verification work timescales for completion:							
a. Housing Allocations completion within the target date set by Housing	95%	100%	100%	100%	98%	99%	99%
b. Right to Buy case completion within 28 working days	95%	100%	96%	100%	100%	98%	100%
c. Financial Assessments completion within 7 working days	95%	100%	100%	100%	100%	100%	100%
d. Section 17 reviews completion within 7 working days	95%	100%	100%	100%	100%	100%	100%
3. Investigation plan completion within 5 working days of case allocation	95%	100%	100%	100%	99%	99%	98%
4. Tenancy fraud referrals received resulting in property recovery	30%	64%	67%	82%	59%	67%	46%
5. Investigations resulting in loss prevention/financial saving outcome	40%	47%	45%	50%	34%	43%	48%
6. Revenue inspections completed within 10 working days of referral date	95%	99%	99%	99%	99%	99%	99%

APPENDIX C: Proactive Counter Fraud Projects 2024/25

Proactive Project & Rationale	Project Outcomes
<p><u>Gas & Electrical Checks Access - Q1</u></p> <p>Working collaboratively with internal departments, the CFT conducted unannounced visits to all social housing properties that were overdue a gas safety or electrical safety check for 12 months or longer. The purpose of this project was to reduce the number of properties that were overdue these inspections, whilst also identifying potential cases of non-occupation or subletting</p>	<ul style="list-style-type: none"> • Number of properties visited - 165 • Properties Recovered - 8 • Investigations continuing - 3 • Financial Savings - £448,000
<p><u>Blue Badge Q1, Q2, Q3</u></p> <p>The CFT conducted a total of six proactive Blue Badge operations in identified high risk areas and 1 Blue Badge amnesty. Checks were carried out on all badges that were displayed to ensure that the badges were being used in accordance with the Blue Badge scheme. The operations included seizing expired badges, which removes them from circulation and prevents potential misuse in the future.</p>	<ul style="list-style-type: none"> • Number of badges checked - 231 • Number of badges seized - 28 • Number of fraudulent uses of badges – 12 • Number of investigations continuing - 6 • Total value of fines - £1,018 • Total value of awarded prosecution costs - £3,871
<p><u>Beds in Sheds – Q1 and ongoing</u></p> <p>'Beds in Sheds' is the term used to describe buildings or annexes on private properties that have been erected without the Valuation Office being made aware and that can be considered habitable. This means that the building or annexe should be charged Council Tax. The CFT carried out unannounced visits to properties that were highlighted via referrals and intelligence checks.</p>	<ul style="list-style-type: none"> • Number identified for bringing into Council Tax - 86 • Investigations continuing - 5 • Income generation - £89,123.11
<p><u>Temporary Accommodation Residency – Q3</u></p> <p>The CFT carried out unannounced residency checks on all service users residing in Temporary Accommodation properties. The purpose of the project was to identify any sub-letting of accommodation, instances of non-occupation, as well as verifying those that had applied for social housing and ensuring that they were still eligible.</p>	<ul style="list-style-type: none"> • Number of properties visited - 225 • Properties Recovered - 3 • Investigations continuing - 8 • Financial Savings - £176,412.25
<p><u>National Fraud Initiative (NFI) - Ongoing</u></p> <p>The National Fraud Initiative (NFI) main exercise is a bi-annual data match against numerous public and private sector data sources. The National Fraud Initiative (NFI) Recheck is an annual data match where SPD data is matched against the Electoral Roll.</p>	<ul style="list-style-type: none"> • £108,077.09 Savings from Single Person Discount matching

<p><u>London Counter Fraud Hub - Ongoing</u></p> <p>The London Counter Fraud Hub is designed to bring London Boroughs together, sharing data to identify cases of fraud, loss or error.</p> <p>The first in house data matching exercise using the LCFH, matched tenancy records against the death register. This highlights any properties that the Council are unaware that the tenant has passed away.</p>	<ul style="list-style-type: none"> • Number of properties returned - 33 • Financial Savings - £2,310,000
<p><u>Internal Revenues Maximisation - Ongoing</u></p> <p>The Revenues Investigation Unit have carried out a series of pro-active action days monitoring and reviewing business rates listings in high-risk areas which has identified new and improved premises to increase business rates billing.</p>	<ul style="list-style-type: none"> • Additional business rates billing - £450,871.54
<p><u>Council Tax Exemptions – Ongoing</u></p> <p>The CFT carried out desk top checks of Class E & F exemptions utilising data matching and in-house data. This highlighted any properties that the Council were unaware that the tenant had passed away or was residing elsewhere due to care needs.</p>	<ul style="list-style-type: none"> • Number of properties returned - 16 • Financial Savings - £1,120,000

APPENDIX D: Counter Fraud Benchmarking 2023/24

London Borough	Council Properties Returned	RTB Cancelled	Housing Applications Closed	Council Tax & CTRS	Blue Badge Outcomes*	Social Care
Barking & Dagenham	9					
Barnet	41	12	6	£39,836	69	
Bexley	27				36	
Brent	15		1	£1,129,121	38	
Bromley				£14,126	78	
Camden	52	10			62	
City of London	14	2	3	£13,218		
Croydon	26					
Ealing	13		119	£53,989		£254,000
Enfield	14	1	5	£2,098		
Greenwich	9				2	
Hackney	37	4	2		61	
Hammersmith & Fulham	18	22	13	£167,828		
Haringey	53	111				
Harrow	8	3	2			£43,003
Havering	14	3	1			
Hillingdon	103	3	29	£123,971	3	£313,864
Hounslow	14	1	9	£38,257		
Islington	47	2	6		9	
Kensington & Chelsea	50		26		20	
Kingston	8	12	32			
Lambeth	78	5		£26,179	126	
Lewisham						
Merton	5		4	£8,206		
Newham	32	8	3			
Redbridge	7	1				
Richmond	5		42			
Southwark	14	3	12			
Sutton	6	7	1	£15,510		
Tower Hamlets	48	9				
Waltham Forest	47	7	7	£712,707	8	
Wandsworth	36	14	17			
Westminster (City of)	38	3	18		2	

Where the cell is greyed out, the data was not available to us from the council in question.

* = Successful outcomes for Blue Badges are defined as fines and/or prosecutions but excludes seized badges.

APPENDIX E: Glossary of Terms

Beds in Sheds

'Beds in Sheds' is the term used to describe habitable outbuildings, or annexes to private properties being utilised without the awareness of the Council or the Valuation Office Agency (VOA).

Blue Badge

A Blue Badge provides parking concessions and helps people with **non-visible and visible disabilities or health conditions** park closer to their destination. The Blue Badge enables holders to park in designated disabled person's parking bays either on the public highway or privately owned car parks. In addition, badge holders can park on single or double yellow lines for up to 3 hours.

Direct Payments

The Council are responsible for administering direct payments to service users who have been assessed as needing care and support services. The payments are made to allow applicants to access care to meet their social care needs, such as support with living tasks and social activities.

Disabled Facility Grant

The council offers a range of financial support schemes for people with disabilities, such as the Disabled Facilities Grant (DFG). The DFG is a means tested scheme that allows eligible applicants to receive financial support to make adaptations to their home, if they, or someone living at the property is disabled.

Financial Assessments

The Council is under a financial and legal obligation to carry out this means tested assessment for each service user. The Financial Assessment (FA) identifies whether the applicant(s) is eligible to receive funding towards their care costs.

Fraud Hub (LCFH)

Utilising the existing Cabinet Office infrastructure and systems, most London based local authorities have agreed to upload internally held data sets for proactive data matching exercises. These regularly agreed upon exercises will lead to the identification of possible fraud, loss or error.

National Fraud Initiative

The National Fraud Initiative (NFI) is a data matching exercise co-ordinated by the Government Cabinet Office and conducted every 2 years. There is also an annual review of claimants in receipt of Single Persons discount data that is matched against the Electoral Roll data. The NFI matches data from over 1,200 organisations, including councils, the police, hospitals and almost 100 private companies to identify potential fraud and error.

New Homes Bonus

The New Homes Bonus (NHB) is a grant that is paid by central government to incentivise local housing growth.

Onsite Immigration Enforcement Official

The Onsite Immigration Enforcement Official (OSIO) provides enhanced access to Home Office data for the purpose of assessing cases involving immigration issues and for assisting in a range of counter fraud work.

Right to Buy

The Right to Buy (RTB) process is a statutory scheme whereby a tenant(s) can apply to purchase their property at a significant discount from its market value. There are strict conditions that must be met by the applicant(s) if they are to qualify for the discount.

Revenues Maximisation

The use of internally held data and the utilisation of external data partners to identify previously unlisted commercial and domestic properties, along with identifying commercial properties that have undertaken modifications or improvements that would result in the revaluation of its Rateable Value (RV). Commercial entities are under no obligation to inform Council Tax as to when they have started trading or if their RV needs to be recalculated. The Council will only retain 15% of the identified rates.

Section 17

The CFT provides assurance and mitigates the risk of fraud within Children's Social Care, in particular the allocation of emergency accommodation provided under Section 17 of the Children's Act 1989. The verification process seeks to validate a family's reason for approach as well as their financial circumstances, as applicants claim to be destitute and requiring accommodation and or financial support. The CFT conducts verification checks on all applicants approaching the Council.

Small business Rates Relief

The Small Business Rates Relief (SBRR) scheme is designed to reduce the amount of business rates payable by small businesses. This reduction is available to ratepayers who occupy a property with a rateable value of no more than £15,000.

Unaccompanied Asylum-Seeking Children

Unaccompanied Asylum-Seeking Children (UASC) are children and young people who are seeking asylum in the UK but have been separated from their parents or carers. Whilst their asylum claim is processed, they are cared for by the Council and provided with accommodation and or financial support.

APPENDIX F: Social Media Campaigns

Cracking down on Blue Badge fraudsters

A Blue Badge amnesty will be launched this month by the council to reduce incidents of disabled parking permit fraud.

The initiative, between Monday 18 November and Monday 2 December, is an opportunity for residents to hand in any badges which they are not entitled to with no questions asked or any ramifications.

More than 14,000 residents have Blue Badges issued by the council. The service is highly valued by people with disabilities and serious health conditions who struggle with mobility.

As part of Fraud Awareness Week (Sunday 17 to Saturday 23 November) the council is also raising awareness of common types of fraud, how it's tackling them and how residents can play their part in reporting deception.

The council's counter fraud team has prevented the loss of more than £5.8 million so far this financial year and the team is ranked one of the best in the country for recovering the most social housing (103 properties), thanks to its proactive investigative work.

Cllr Martin Goddard, Cabinet Member for Finance and Transformation, said:

"Blue Badges help people with disabilities and health conditions park closer to their destination, but sadly they can be abused which is unfair on those that rely on the exemptions and dedicated parking spaces.

"We have prosecuted 11 people for Blue Badge fraud in the past year with each receiving a fine, and are giving people who may be misusing them this opportunity to return them, with no questions asked."

Residents can return Blue Badges that have expired, belong to another person or are no longer necessary to the collection boxes in the reception areas at the Civic Centre, Uxbridge; Botwell Green Library and Northwood Hills Library.

If you suspect that someone is committing fraud against the council, you can report it directly to us in confidence at www.hillingdon.gov.uk/report-fraud or by calling 0800 389 8313.



Counter fraud team regains homes

More than 100 properties were recovered in 2023/24 thanks to investigations by the council's award-winning counter fraud team.

In total, 103 homes, collectively valued at £5,712,000, were recovered.

In addition, the team also cancelled 42 accommodation placements due to non-occupation and false homelessness applications for the council's emergency accommodation since April 2023, saving the council approximately £353,000.

The team is responsible for investigating many types of tenancy fraud, including sub-letting, non-occupation, wrongful successions, and submitting false information on applications for homelessness and right to buy properties.

Tenancy fraud and other housing-related frauds deprives genuinely eligible families of a much-needed home. In November, the team's achievements were recognised at the

Public Finance Awards when they took home several trophies for their ingenuity, creative initiatives and success in tackling fraud.

Cllr Martin Goddard, Cabinet Member for Finance, said: "At a time where people are relying on our services more than ever, it is vital that we continue to protect our funds against fraud, so we have the resources to support our most vulnerable residents.

"It is thought that this year the council has the highest recovery rate across London, which is testament to the team's expertise and hard work."

If you suspect tenancy fraud is taking place, report it at www.hillingdon.gov.uk/report-fraud or by calling 0800 389 8313 (Monday to Friday, 9am to 5pm), by emailing fraud@hillingdon.gov.uk or sending a letter to the Counter Fraud Manager, 2N, Civic Centre, High Street, Uxbridge, UB8 1UW.

