

# **Corporate Fraud Investigation Team Progress Report April 2015 - February 2016**

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## **REASON FOR ITEM**

To inform members of the work undertaken by the Corporate Fraud Investigation Team (CFIT) from April 2015 to February 2016.

## **OPTIONS AVAILABLE TO THE COMMITTEE**

**The Committee is asked to consider and note the Corporate Fraud Investigation Team report.**

## **INFORMATION**

### **1. Roles and Responsibilities**

The Council has a responsibility to protect the public purse through proper administration and control of the public funds and assets to which it has been entrusted. The work of the Corporate Fraud Investigation Team (CFIT) supports this by providing efficient value for money anti-fraud activities and investigates all referrals to an appropriate outcome. The Team provides support, advice and assistance on all matters of fraud risk including prevention, fraud detection, other criminal activity and deterrent measures.

Corporate Fraud Investigation Team activities since April 2015 included:

- Social Housing fraud
- Council Tax/Business Rates inspections
- Single Person Discount (SPD)
- Temporary Accommodation and Housing Needs Reception
- Right to Buy investigations
- Proceeds of Crime investigations
- Housing Waiting List
- Enhanced Recruitment Verification
- Blue Badge
- Procurement fraud
- Mobile working
- Council Tax Reduction Scheme (CTR)

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## 2. Corporate Fraud Investigation Team Objectives

The Corporate Fraud Investigation Team aims to maximise income and reduce expenditure for the Council. The team intends to detect and prevent fraud across all Council activities and when appropriate prosecute offenders. The results of the work of the CFIT will ensure Hillingdon is able to achieve the objective of putting residents first.

## 3. Performance Outcomes April 2015 – February 2016

### 3.1 Social Housing Fraud

In October 2013 the Government passed legislation to criminalise sub-letting fraud. On conviction, tenancy fraudsters face up to two years in prison or a fine. Hillingdon will use these powers to prosecute suitable cases.

The CFIT investigates suspected cases of social housing fraud which are identified either by direct referral from Housing Officers, data matching exercises or telephone calls to the fraud hotline. Since April 2015 the CFIT has recovered 70 properties which are now available to be re-let to residents in genuine housing need. This compares to 56 re-covered properties for the full year 2014/15.

The Audit Commission, in their report 'Protecting the Public Purse 2014' estimated that nationally it costs councils on average £18,000 a year for each family placed in temporary accommodation. Using this calculation the savings for Hillingdon this year are £1,260,000.. The target set by CFIT for 2015/16 is to recover 52 properties (1 a week). This target has been exceeded and the expectation is that more properties will be recovered by the end of the financial year.

In total since the commencement of this project in 2010 the CFIT have recovered 256 properties which using the Audit Commission calculation equates to savings of just over £4.6 million.



To promote this project the Blow the whistle on Housing Cheats poster appears in Hillingdon People, this helps to generate calls to our fraud hotline, all referrals are fully investigated.

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Examples of combating social housing fraud are also publicised in Hillingdon People. These articles often describe the improved quality of life for Hillingdon residents who have been allocated the tenancy of a recovered property. This generates positive feedback from residents and encourages reporting of suspected social housing fraud.

An example of this will be shown by an article which is due to appear in the March/April edition of Hillingdon People. This will inform residents of a recent case where Housing Investigation Officers identified that a tenant was not living in their 2 bed property and they had also put in an Right to Buy application for this address. As a result of this investigation the tenancy was terminated and the Right to Buy was cancelled. This property was then allocated to a tenant who wanted to downsize from a 4 bed property. This meant that a 4 bed property was then available to house a family in genuine need of this accommodation.

Table 1 shows the number of properties recovered monthly and the notional savings achieved based on the Audit Commission calculation.

**Table 1**

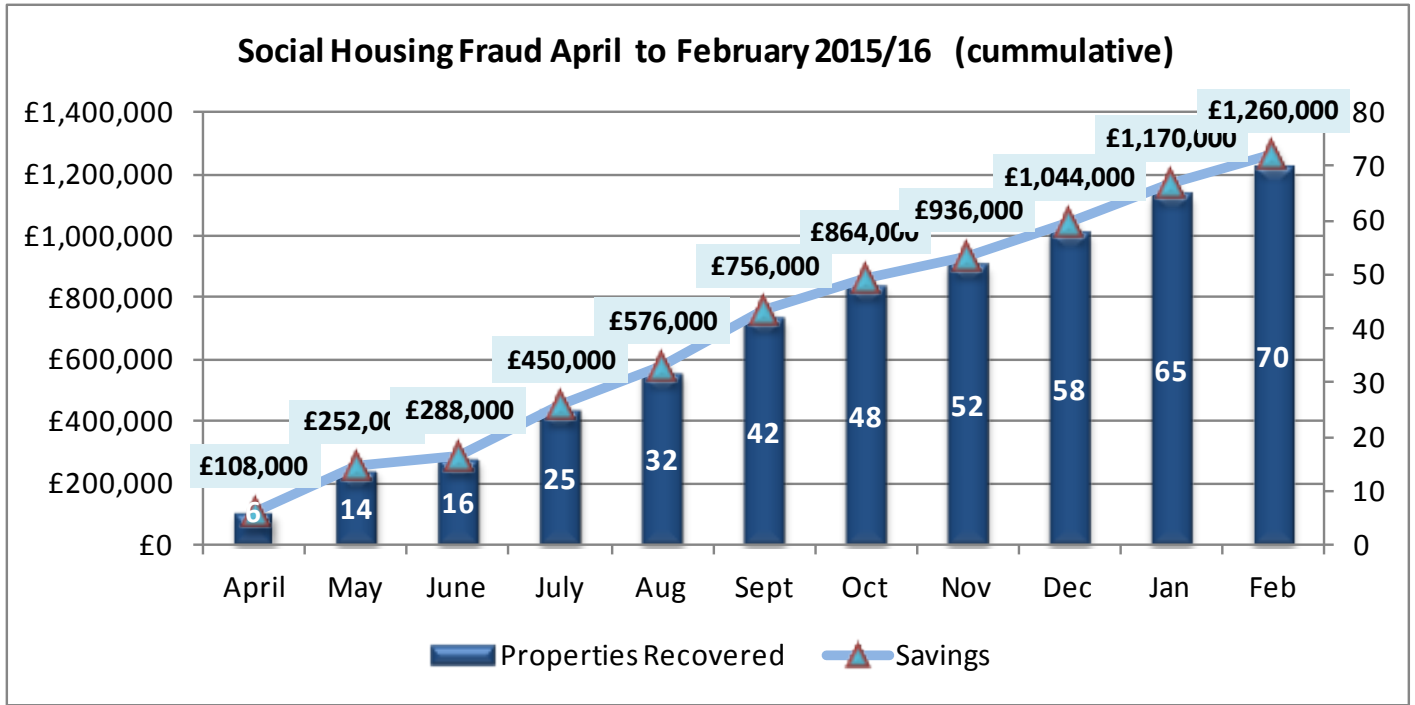
<b>Social Housing Fraud – number of properties recovered and savings achieved</b>												
2015/16												
	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Total
<b>Number</b>	6	8	2	9	7	10	6	4	6	7	5	70
<b>Savings</b>	£108k	£144k	£36k	£162k	£126k	£180k	£108k	£72k	£108k	£126k	£90k	£1,260k

\*The Audit Commission estimates that every property recovered represents a saving of £18,000

Chart 1 shows the cumulative properties recovered and saving since April 2015.

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Chart 1



The CFIT is currently gathering intelligence to pursue prosecution of 1 social housing fraud cases. The case was reported by a neighbour as a sub-letting referral, on investigation this information was substantiated.

### 3.2. Council Tax and Business Rates Inspections

The inspection role for Council Tax and Business Rates within the Corporate Fraud Team is crucial in terms of maximising the Councils revenue income.

This financial year from April 2015 to February 2016 there have been 13,059 visits, this compares to 12,026 carried out for the whole year 2014/15, projected growth of 18%. The visiting programme is very intense and officers are trained in all areas of work to ensure an efficient and planned approach to all visits.

Council Tax Inspections are generally reactive and identify the status of those claiming discounts and exemptions. Where the visit establishes the wrong amount of Council Tax is being charged the account is changed and the person re-billed. 8,287 Council Tax inspection visits have been made from April 2015 to February 2016.

Business Rate inspection visits are carried out to check occupation status of commercial premises to ensure the Council maximises the non domestic rate revenue. Similarly, the new build visits are carried out to ensure properties are rated for domestic or business rates as soon as they are completed. It is estimated that from January 2016 to March 2017 there will be approximately 1,300 new build properties being developed in Hillingdon. This represents a

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significant amount of additional revenue. 4,772 visits have been made between April 2015 and February 2016 to check Business Rates and New Build Inspections.

The robust visiting programme continues in 2015/16 working with internal partners such as planning to monitor new developments with the aim of maximising revenue potential.

Table 2 and chart 2 show the number of visits carried out each month since April 2015.

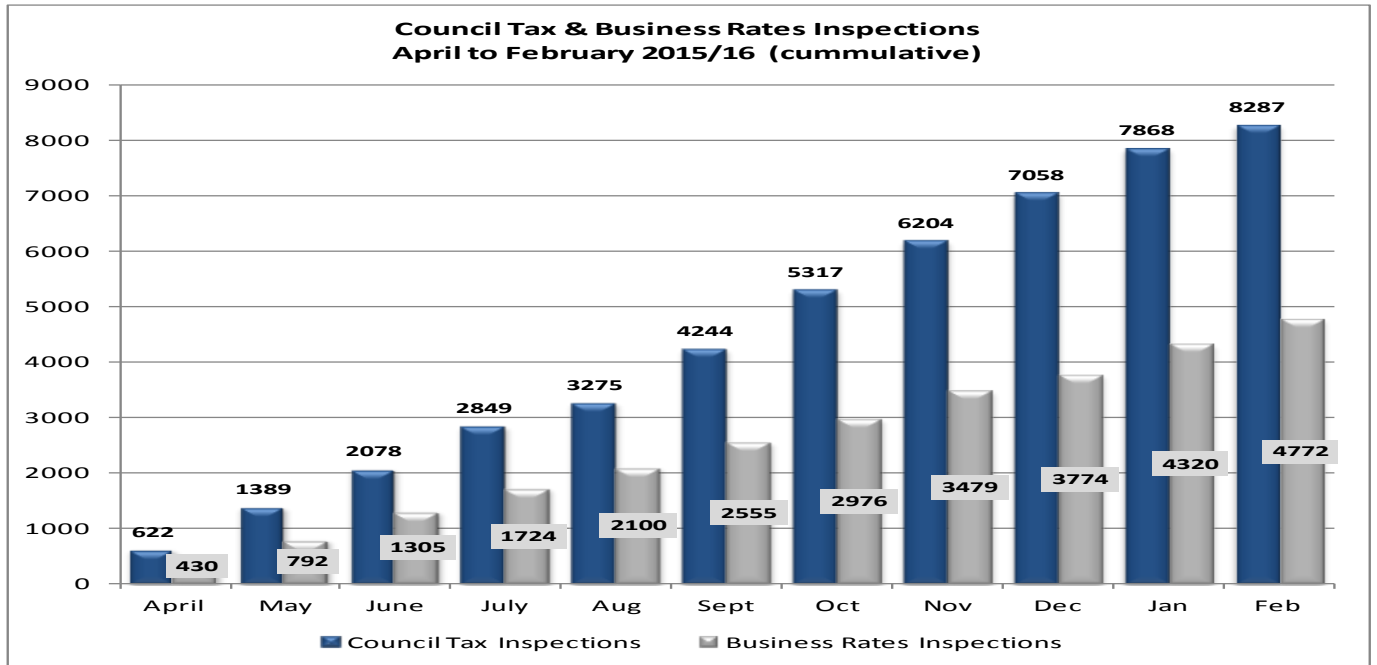
Table 2

<b>Council Tax and Business Rates Inspections</b>			
		<b>Number of Council Tax Inspections</b>	<b>Number of Business rates and New Build Inspections</b>
<b>2015/16</b>	<b>April</b>	622	430
	<b>May</b>	767	362
	<b>June</b>	689	513
	<b>July</b>	771	419
	<b>August</b>	426	376
	<b>September</b>	969	455
	<b>October</b>	1073	421
	<b>November</b>	887	503
	<b>December</b>	854	295
	<b>January</b>	810	546
	<b>February</b>	419	452
	<b>YTD</b>	<b>8,287</b>	<b>4,772</b>
<b>Income★</b>	Increase in CT revenue	Increase in Business Rate/New Build revenue	

★ Data is not specifically recorded of the increased revenue from CFIT inspections. This additional income contributes to the overall Council Tax and Business Rates revenue.

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Chart 2



### 3.3 Single Person Discount (SPD)

The CFIT have been working on a project since January 2015 to identify incorrect claims for Single Person Discount. The project is producing very positive results in terms of reducing the number of SPD claims and generating additional income to the Authority. There are currently 29,947 SPD claims in Hillingdon. Since the commencement of this project SPD numbers are the lowest they have been for the last five years.

The CFIT are operating 4 work streams to match internal data sources against SPD claims.

Under the first work stream SPD records are being matched against Hillingdon First cards issued since April 2014. The matching exercise establishes if more than one person is registered for a Hillingdon First card at an address where SPD is being claimed. To date 135 SPD cases have been stopped resulting in an overpayment of £69k which will be recovered as additional revenue.

The second work stream concerns 'notices of the intention to marry' submitted to the Registrar's Office. Couples have to include their current residence on these applications and these details have been matched to SPD claims. Records from April 2014 are being checked and to date 56 cases have been identified resulting in an overpayment of £47k which will be recovered.

The third work stream involves data matching SPD records with the Electoral register. To date 264 cases have been identified resulting in an overpayment of £202k for recovery.

The fourth work stream commenced in November to match SPD claims against residents parking permits. The initial data matching has identified 278 matches which require further

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investigation. The investigations are likely to find that some of these matches are the result of poor data quality; however, any confirmed data matches will be processed for further investigation.

If a suspected SPD fraud is identified the CFIT carries out additional background checks on the claimant, such as housing records, benefit records, school records and Equifax online credit reference checks. A member of the CFIT then contacts the claimant either by telephone, letter or personal visit to discuss the claim and the evidence indicating fraudulent activity. In most instances as a result of this contact, claimants choose to resolve matters swiftly and make arrangements to repay the Council any monies they have previously claimed in discount. They are keen to settle the matter and avoid any repercussions.

Since April 2015 the CFIT team have commenced a significant data matching exercise with a credit reference agency called Experian. This exercise matches all our SPD claims with credit reference information to establish if applications for SPD are genuine. The matches have been rated into categories of high, medium and low depending upon the likelihood of an incorrect SPD claim. Officers from the CFIT are investigating all relevant cases. To date 97 SPD cases have been stopped resulting in a saving of £71k.

We have also run some additional in house reports to compare information on different systems and this has identified a further 189 cases resulting in savings of £82k.

Since January 2015/16 the CFIT have cancelled 767 SPD claims resulting in overpayments of £484k as shown in table 3.

**Table 3**

<b>Council Tax - Single Person Discount – since January 2015</b>		
<b>Workstream</b>	<b>Number of claims stopped</b>	<b>Overpaid SPD</b>
Hillingdon First Card data matching	135	£69k
Notices of intention to marry checks	56	£47k
Electoral registration data matching	264	£202k
Experian credit reference agency data matching	97	£71k
In-house data matching reports	215	£95k
<b>Total</b>	<b>767</b>	<b>£484k</b>

Charts 3 and 4 show summaries of the SPD overpayments and the number of households where claims have been cancelled from the intervention of the CFIT.

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Chart 3

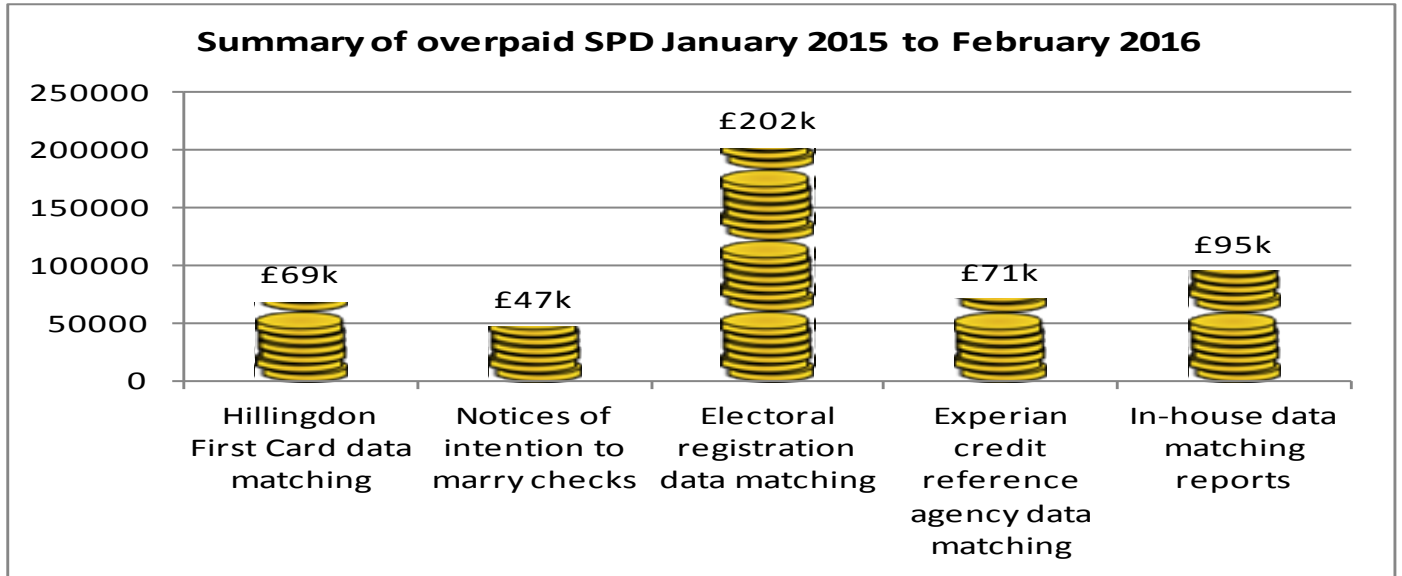
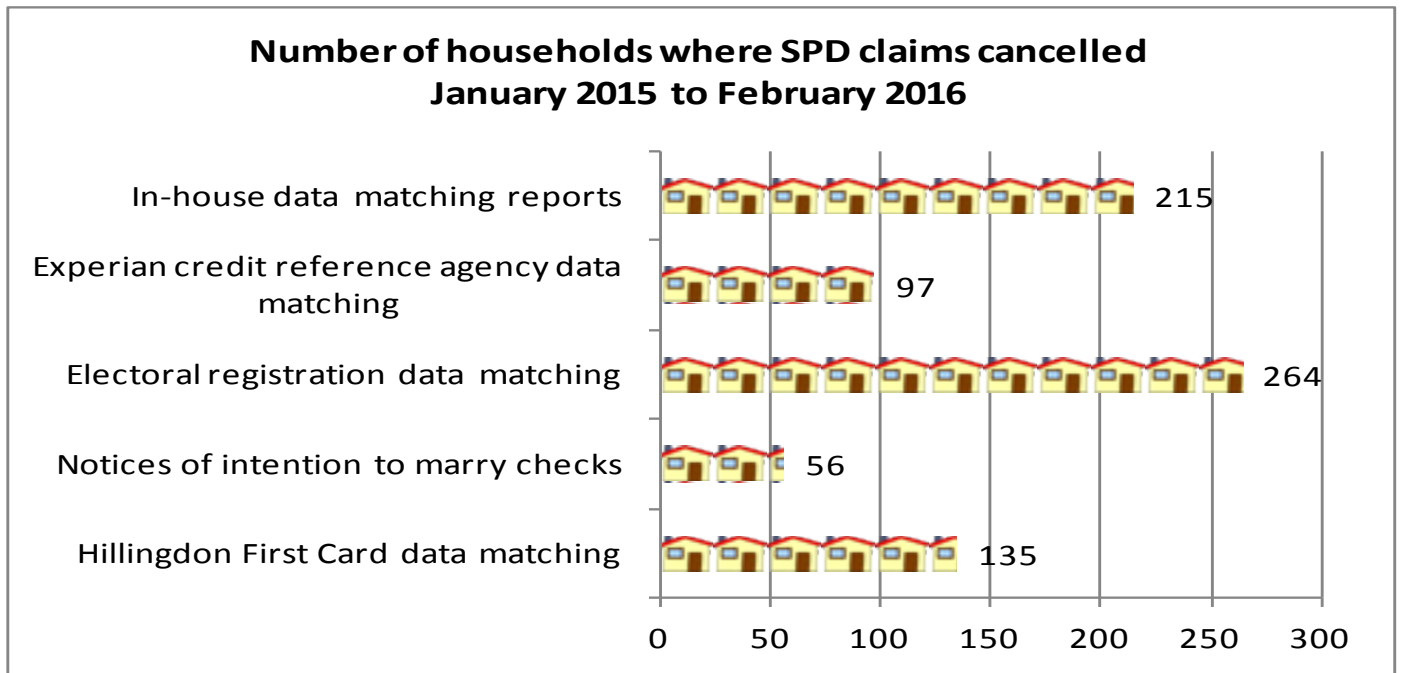


Chart 4



In cases where there is evidence of serious fraud the CFIT will look to pursue the prosecution of the claimant.



**Are you receiving single person discount on your council tax?**  
 The spotlight is on you if more than one adult is living at your address.  
 Don't wait for that knock on your door  
 Call us today 0300 123 1384  
**You can be prosecuted for a false claim**

If you suspect someone of falsely claiming single person discount call 0800 389 8313 or email fraud@hillington.gov.uk. Your report will be treated in the strictest confidence and can be given anonymously.



www.hillingdon.gov.uk

The poster opposite appears in issues of Hillingdon People and notice boards around the

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PRESS



Borough to raise the profile of Single Person Discount abuse.

### 3.4 Temporary Accommodation & Housing Needs reception.

The aim of this project is to prevent illegal claims for housing from people that do not qualify for housing support from Hillingdon. This means people who are misrepresenting themselves as homeless and therefore do not have a genuine housing need.

The CFIT carries out unannounced visits to Bed & Breakfast/Temporary Accommodation to verify residency. Since April 2015 through the work of the CFIT 10 cases have been cancelled, this represents a saving of approximately £2,870 a week. The average duration of a bed & breakfast placement is 13 weeks. Therefore on these 10 cancellations alone approximately £37,310 will be saved through this activity.

The CFIT are working with Housing Officers to identify applicants where there is a suspicion that a fraudulent claim has been made. This could include applicants submitting false wage slips in an attempt to verify economic activity. This would indicate financial independence which is a condition for some claimants to secure a tenancy and increase welfare benefits. Another example is where people falsely claim they are being evicted from an address in Hillingdon when they have never actually been a resident at this address. They are often giving this fraudulent information to attempt to meet the 10 year residency rule. Officers from the CFIT have trained Housing Officers on the identification of possible fraudulent claims. These cases are then referred to the CFIT for investigation.

Since April this year 10 applicants have withdrawn their claim for housing support as a result of contact with the CFIT.

From April 2015 the CFIT has expanded this work to verify the claims of people awaiting permanent accommodation to verify they are still eligible and their circumstances mean that they have a genuine housing need. To date 660 requests for verification visits have been passed to the CFIT. Of these 21 were found to not be eligible for housing support.

Table 4

<b>Temporary Accommodation &amp; Housing Needs Reception</b>		
	<b>YTD 2015/16</b>	<b>Savings per week</b>
Temporary Accommodation Cancelled	10	★£2,870
Number of cases withdrawn after CFIT contact	10	
Applications not approved after CFIT verification visit	21	

★Average B&B placement = 13 weeks calculates to £37,310

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### 3.5 Right to Buy

Right to Buy applications are verified by the Corporate Fraud Investigation Team. Since April 2015 the CFIT have carried out 130 Right to Buy verifications, following CFIT involvement 7 applications have been rejected.

The CFIT found in one of these cases that the tenant was actually living in Birmingham and her son had sublet the property on her behalf to two families, the Right to Buy application has been cancelled, Two other cases concerned tenants who had applied for mortgages whilst still claiming housing benefit. The final four cases cancelled their applications following contact from the CFIT.

We have also introduced our own additional Right to Buy application form to ensure that the verification process captures all the available information.

Table 5

<b>Right to Buy</b>		
	2015/16	
	YTD	Savings
Number of Right to Buy verifications	130	
Number of applications rejected	7	<b>£644,950 (discount)</b>

### 3.6 Proceeds of Crime Investigations (POCA)

The role of the Accredited Financial Investigator (AFI) within the Corporate Fraud Team is crucial in the fight against crime. The aim is not only to prosecute serious offenders but also to look at recovering additional monies where the offender has benefited financially from their crimes and a criminal lifestyle can be demonstrated.

These investigations are complex and are often challenged by the offender which results in lengthy legal processes. Therefore it may take many months for a case to reach court and a confiscation order agreed and paid.

Since April 2015 the CFIT have been working on 12 investigations of which 7 are currently before the courts. Confiscation orders have been obtained in a number of cases and Hillingdon will receive 37.5% of the amount awarded under the Home Office Incentivisation scheme. Since 1<sup>st</sup> April 2015, Hillingdon has received £38,076 in Incentivisation payments from the Home Office. A further Incentivisation payment of £50,700 is due on 31<sup>st</sup> March 2016.

Since the 1<sup>st</sup> June 2015 a Planning Enforcement Officer has been working with the AFI on a part-time basis to ensure effective identification of cases where planning regulations have been breached. Two cases are currently the subject of prosecutions for failing to comply with Planning Enforcement Notices. Both cases relate to the unlawful subdivision of properties into flats. The flats were subsequently rented out and therefore the landlords were obtaining rental income whilst in breach of the Enforcement Notice. It is estimated that each landlord obtained in

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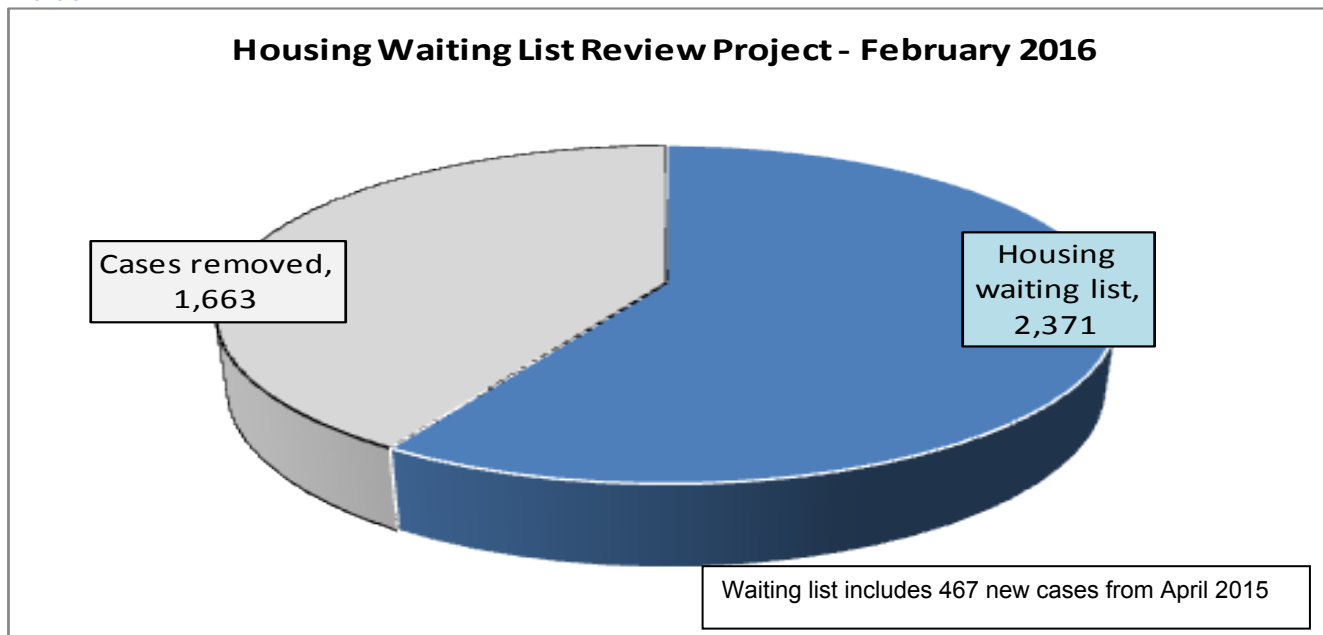
excess of £50,000 in rental income during this period. If criminal convictions are obtained confiscation proceedings will be instituted against the landlords. A third case also involving the subdivision of a property into flats is also being investigated..

A second Trading Standards Officer has now obtained Accredited Financial Investigator status meaning the Council now has increased capacity to carry out confiscation investigations. Work is underway to identify potential trading standards fraud and planning cases that may be suitable for confiscation under POCA.

### 3.7 Housing Waiting List

A project was set up by the CFIT in April 2015 to review the current Housing Register Waiting List, at that time there were 3,567 applications on the waiting list. The purpose of the project was to identify through checking council records, such as Council Tax information and electoral registration, people on the waiting list who were no longer entitled to Social Housing. Their circumstances had either changed or they provided false information on their application. Removing these people from the waiting list means that the Council will have an accurate data relating to current social housing needs for effective forward planning.

Chart 5



Since the project commenced on 27<sup>th</sup> April 2015, the CFIT reviewed all cases. Cases where a change was readily identifiable were targeted for investigation and if they were no longer eligible they were removed. This has meant that 1,663 applications have been removed from the waiting list. In the process of this exercise the CFIT has also identified 26 cases where the household has been incorrectly claiming Single Person Discount for Council Tax which totals £13k. This review project will be ongoing in 2015/16 to carry out enhanced checks on the remaining cases on the waiting list. Currently there are 2,519 applications on the housing waiting list; this includes new people added to the list since the project began.

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### **3.8 Enhanced Recruitment Verification**

HR have presented a report which was approved by the Corporate Management Team in December 2015. A pilot project will commence in April 2016, the CFIT will carry out enhanced checks to verify identity, qualification, education documents and employment history. This will ensure eligibility to work and effective recruitment. The CFIT has previously identified staff through routine data matching who were ineligible to work because of their immigration status. Expanding these checks in the recruitment process would prevent the future employment of fraudulent applicants. This would prevent damage to the Councils reputation, reduce unnecessary recruitment costs and ensure the appointment of suitably qualified staff.

### **3.9 Blue Badge**

In July we carried out an exercise with the Police to check the correct use of Blue Badges in Hayes Town Centre. Two cases were identified where the Blue Badge was being used by someone other than the Blue Badge Holder. Both of these cases have been prosecuted. One was a case of a mother misusing a badge which had been issued for her son. Her son was at school at the time she was using the badge. She was ordered to pay £300 in total for this offense. The other case concerned a son using his mothers badge and was ordered to pay £996 in total. These cases will be publicised in Hillingdon People. These prosecutions were a result of good collaborative work with the police.

On the day of the checks Residents thanked Officers for undertaking this exercise which they thought should be repeated. Further exercises are planned throughout the year.

### **3.10 Procurement Fraud**

In January 2015 the CFIT secured £112,500 funding, through a bid process, from the Government to investigate procurement fraud in partnership with the Police. In 2015/16 a project was developed with the Police to establish methods to detect and investigate procurement fraud effectively to maximise results.

To date we have matched all our Procurement Supplier information with the Police suspicious activity reports, often referred to as SARs. This data holds records on people and companies where there would appear to be some suspicion on their creditability. This data match did not identify any cases that need to be investigated.

### **3.11 Mobile working**

Mobile technology has been introduced to support CFIT operations. Under the new system verification visit requests are sent directly to CFIT Housing Inspection Officer's mailbox which they access through laptops. Information obtained during the visit is completed directly onto Hillingdon's operating system ensuring that information used by housing staff is accurate and up to date. The CFIT Housing Inspection Officers work across a 24/7 schedule and so accessing new visit requests whilst they are out in the field increases productivity with improved response rates. This produces cost efficiency in their time and reduces mileage costs by removing the need to return to the civic centre to collect work and update records.

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### 3.12 Council Tax reduction scheme (CTR)

The CFIT is currently reviewing CTR claims against the national fraud initiative data matches. All cases where anomalies are identified will be investigated and appropriate action taken. Results from this exercise will be reported in future CFIT performance reports.

### 3.13 Trading Standards

Following a BID review the responsibility for Trading Standards has been transferred to the CFIT from November 2015. This will enhance the opportunities for joint working and achieve efficiency of skills and resources.

In order to raise awareness of the work of the Trading Standards Team article is scheduled to appear in the March/April edition of Hillingdon People. This will inform residents the effectiveness of the Trading Standards Team and the specific areas they cover. It is anticipated that this article will promote the reporting of suspected breaches of Trading Standards legislation.

## 4. CFIT Work Plan for 2016/17

The work of the CFIT has consistently achieved successful results in 2015/16. Many of the currently projects will continue into the new financial year. These will carry on protecting the public purse through prevention and identification of fraud, increasing revenue for the Council and ensuring that resources are targeted to residents in most need.

Plans are already in place for the development of new projects during 2016/17 and other projects will be initiated as the year progresses and further opportunities for the prevention and detection of fraud arise.

The following Work Plan provides an indication of the planned work to date of the CFIT for 2016/17.

	What difference will this make
<b>Housing</b>	
Housing verifications	<ul style="list-style-type: none"><li>• Allocation of housing to residents in genuine Housing need</li></ul>
Bed & breakfast checks	<ul style="list-style-type: none"><li>• Ensure residents eligibility to the service</li></ul>
Temporary accommodation	<ul style="list-style-type: none"><li>• Ensure residents eligibility to the service</li></ul>
Social Housing Fraud	<ul style="list-style-type: none"><li>• Recovery of unlawful use of Council properties</li><li>• Allocation of housing to residents in genuine housing need</li></ul>
Housing waiting list	<ul style="list-style-type: none"><li>• Ensure residents eligibility to the service, reduction in waiting list</li></ul>
Housing applications	<ul style="list-style-type: none"><li>• Ensure residents eligibility to the service</li><li>• Allocation of housing to residents in genuine Housing need</li></ul>
Right to Buy	<ul style="list-style-type: none"><li>• Ensure residents eligibility</li></ul>

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<b>Council Tax Revenue</b>	
Single Person Council Tax Discount	<ul style="list-style-type: none"> <li>• Ensure residents eligibility to the discount</li> <li>• Increased revenue</li> </ul>
Student Council Tax discount	<ul style="list-style-type: none"> <li>• Ensure residents eligibility to the discount</li> <li>• Increased revenue</li> </ul>
Council tax inspections	<ul style="list-style-type: none"> <li>• Increased revenue</li> </ul>
Business rates inspections	<ul style="list-style-type: none"> <li>• Increased revenue</li> </ul>
<b>Targeted projects</b>	
Blue Badge checks	<ul style="list-style-type: none"> <li>• Reduction in misuse of scheme, increase parking availability to genuine badge holders</li> </ul>
Enhanced recruitment verification	<ul style="list-style-type: none"> <li>• Suitable qualified staff recruited</li> <li>• Protect Council reputation</li> <li>• Reduction in recruitment costs</li> </ul>
Proceeds of Crime investigations	<ul style="list-style-type: none"> <li>• Increase revenue</li> <li>• Prevents future abuse</li> </ul>
Recovery of bad debts	<ul style="list-style-type: none"> <li>• Increase revenue</li> </ul>
Data matching	<ul style="list-style-type: none"> <li>• Increase revenue</li> <li>• Ensure residents eligibility to services</li> </ul>
Trading Standards investigations	<ul style="list-style-type: none"> <li>• Reduction in abuse of legislation, eg selling of illegal tobacco or alcohol</li> </ul>
Mobile working	<ul style="list-style-type: none"> <li>• Improved efficiency, increased checks and investigation capacity</li> </ul>
Cross departmental working	<ul style="list-style-type: none"> <li>• Ensure residents eligibility</li> <li>• Increase revenue</li> <li>• Appropriate use of Council funds</li> </ul>

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