

Corporate Fraud Investigation Team Progress Report April to October 2016

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REASON FOR ITEM

To inform members of the work undertaken by the Corporate Fraud Investigation Team (CFIT) for April to October 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 2016 included:

- Social Housing Fraud
- Council Tax/Business Rates inspections
- Single Person Discount (SPD)
- Residency and Verification checks
- Right to Buy investigations
- Proceeds of Crime investigations
- Housing Waiting List
- Enhanced Recruitment Verification
- National Fraud Initiative (NFI)
- Trading Standards
- Blue Badge
- Bad debts
- Students
- Unaccompanied Asylum Seekers
- Benchmarking

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 2016 – October 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, verification and repairs visits or telephone calls to the fraud hotline. In 2015/16 the CFIT has recovered 74 properties which are now available to be re-let to residents in genuine housing need. From April to October this year 46 properties have already been recovered.

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. The target set by CFIT for 2016/17 is to recover 52 properties (1 a week).

In total since the commencement of this project in 2010 the CFIT have recovered 306 properties which using the Audit Commission calculation equates to savings of just over £5.5 million.



To promote this project the Blow the whistle on Housing Cheats poster appears in Hillingdon People and Council reception areas. This helps to generate calls to the fraud hotline. All referrals are fully investigated.

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.

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

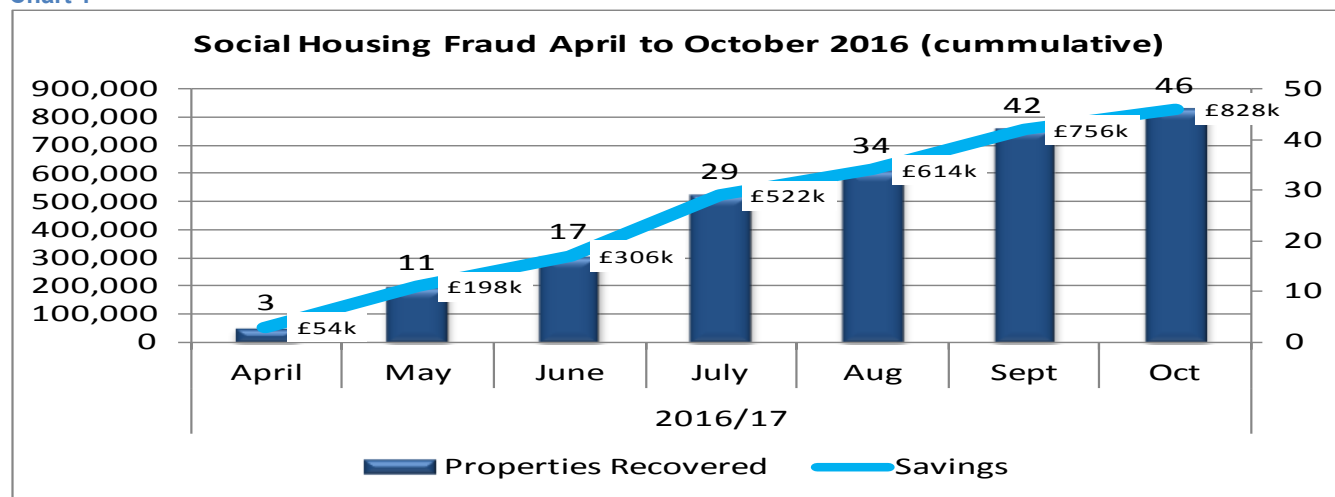
Table 1

Social Housing Fraud – number of properties recovered and savings achieved		
2016	Number	Savings
April	3	£54,000
May	8	£144,000
June	6	£108,000
July	12	£216,000
August	5	£90,000
September	8	£144,000
October	4	£72,000
Total	46	£828,000

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 2016.

Chart 1



In April 2016 the CFIT commenced a new project in partnership with the Housing repairs service. The repairs service is required to carry out annual Gas Safety checks on all council owned properties. If they are experiencing problems gaining access cases are referred to the CFIT for further investigation. Generally, the properties that the contractor or CHO cannot gain access, have multiple household issues ranging from sub-letting, non-occupation, mental health or vulnerable persons. Some cases include residents in care or hospital.

Since April this year this project has identified 12 cases where the property was unoccupied and was returned to the housing stock for re-allocation.

Generally the repairs service needs authority from the Court to access properties where tenants are not present. This can cost in the region of £900 and is very time consuming. Since April the CFIT through this project have cancelled 4 cases from Court saving the Council both time and money.

This project now includes working closely with social care mental health teams to discuss complex cases including people receiving support under the Mental Health Act. Meetings are held monthly to determine appropriate actions.

Targetted tenancy audits are planned in November to a specific area where intelligence suggests breaches of tenancies may be identified. These visits will be carried out with Housing colleagues who are responsible for rent collection and tenants needs.

3.2 Council Tax and Business Rates Inspections

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

From April to October 2016 there have been 7,024 visits. 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.

In April 2016 the criteria for exemptions changed. Any new cases from April are only entitled to 21 days exemption rather than 6 months as previously. This change has reduced the need for repeated visits and therefore the numbers of Council Tax inspections have reduced from September 2016.

4,375 Council Tax inspection visits have been made from April to October 2016. These visits included reviews of 738 empty properties across the borough, identifying 146 as being occupied and contribution towards securing a reduction in the reported number of long-term empty homes from 463 in October 2015 to 401 in October 2016. As reducing the number of long term empty homes secures additional income for the Council through the New Homes Bonus grant, this work has secured £228k per annum for at least four years from 2017/18.

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 significant amount of additional revenue. 2,649 visits have been made between April and October 2016 to check Business Rates and New Build Inspections.

The robust visiting programme continues in 2016/17 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 2016.

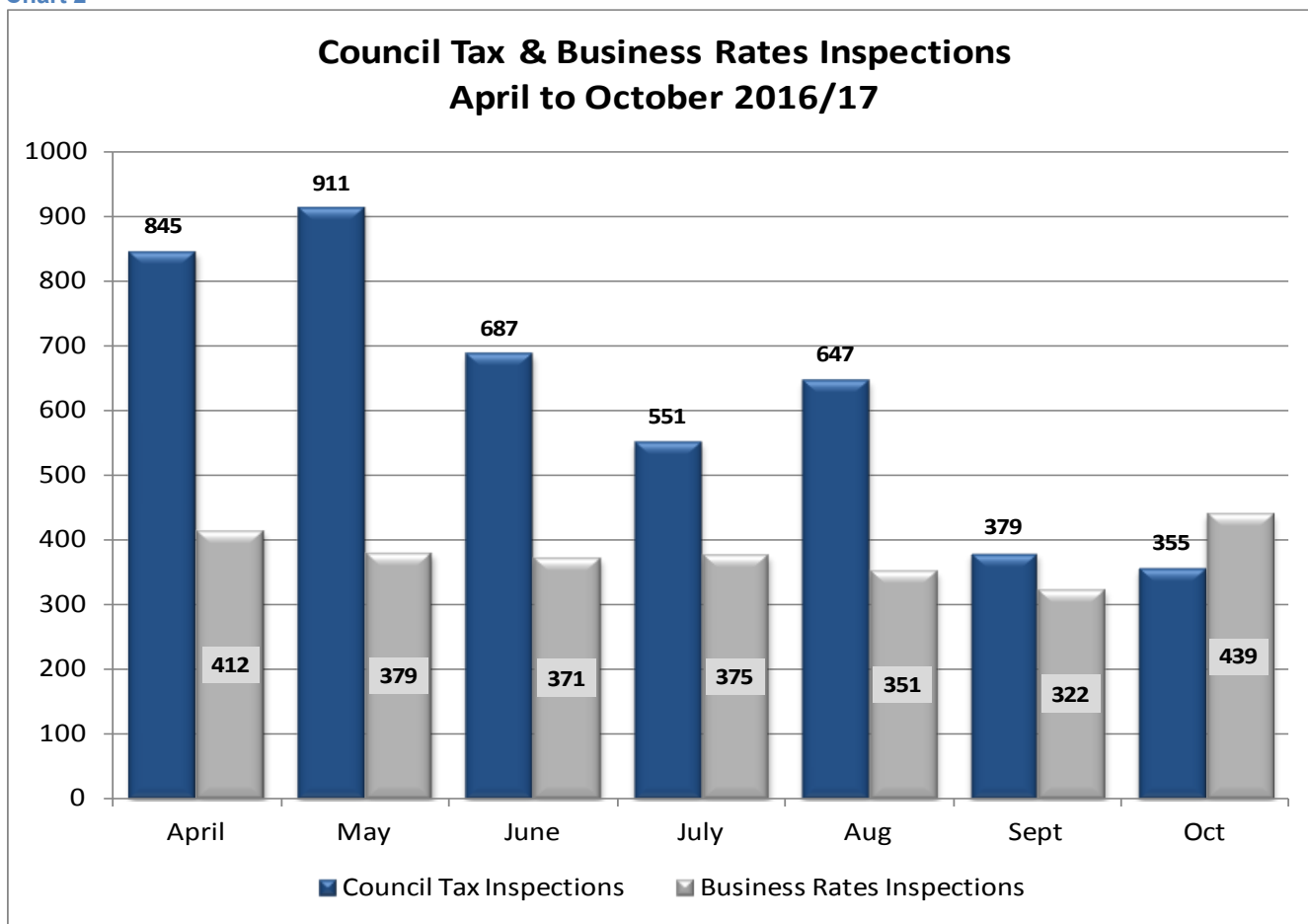
Table 2

Council Tax and Business Rates Inspections		
	Number of Council Tax Inspections	Number of Business rates and New Build Inspections
April	845	412
May	911	379
June	687	371
July	551	375
August	647	351
September	379 ^①	322
October	355 ^①	439
YTD 2016/17	4,375	2,649
Income^②	Increase in CT revenue	Increase in Business Rate/New Build revenue

① Change in exemptions criteria

② 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.

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 29,699 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 5 work streams to match internal data sources against SPD claims.

Under the first work stream Hillingdon First card applications are automatically data matched to SPD records on a daily basis. This process establishes if more than one person is registered for a Hillingdon First card at an address where SPD is being claimed.

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 are matched to SPD claims.

The third work stream involves data matching SPD records with the Electoral register. This establishes if more than one person is registered at an address.

The fourth work stream concerns SPD reviews where visits are made to verify occupancy of a property where SPD is being claimed. Properties in the higher council tax bandings are being targeted as if these are found to be incorrect there will be a greater financial return.

A fifth work stream commenced in August 2016. This involves school places applications. Applications include household composition information and this can be data matched against SPD records.

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 legal repercussions.

We have also run some additional in house reports to compare information on different systems. Since April 2016 the CFIT have cancelled 352 SPD claims resulting in overpayments of £218.8k as shown in table 3.

Table 3

Council Tax - Single Person Discount – since April 2016		
Workstream	Number of claims stopped	Overpaid SPD
Hillingdon First Card data matching	39	£14k
Notices of intention to marry checks	64	£32k
Electoral registration data matching	180	£132k
SPD reviews	14	£7.8k
In-house data matching reports	55	£33k
Total	352	£218.8k

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.

Chart 3

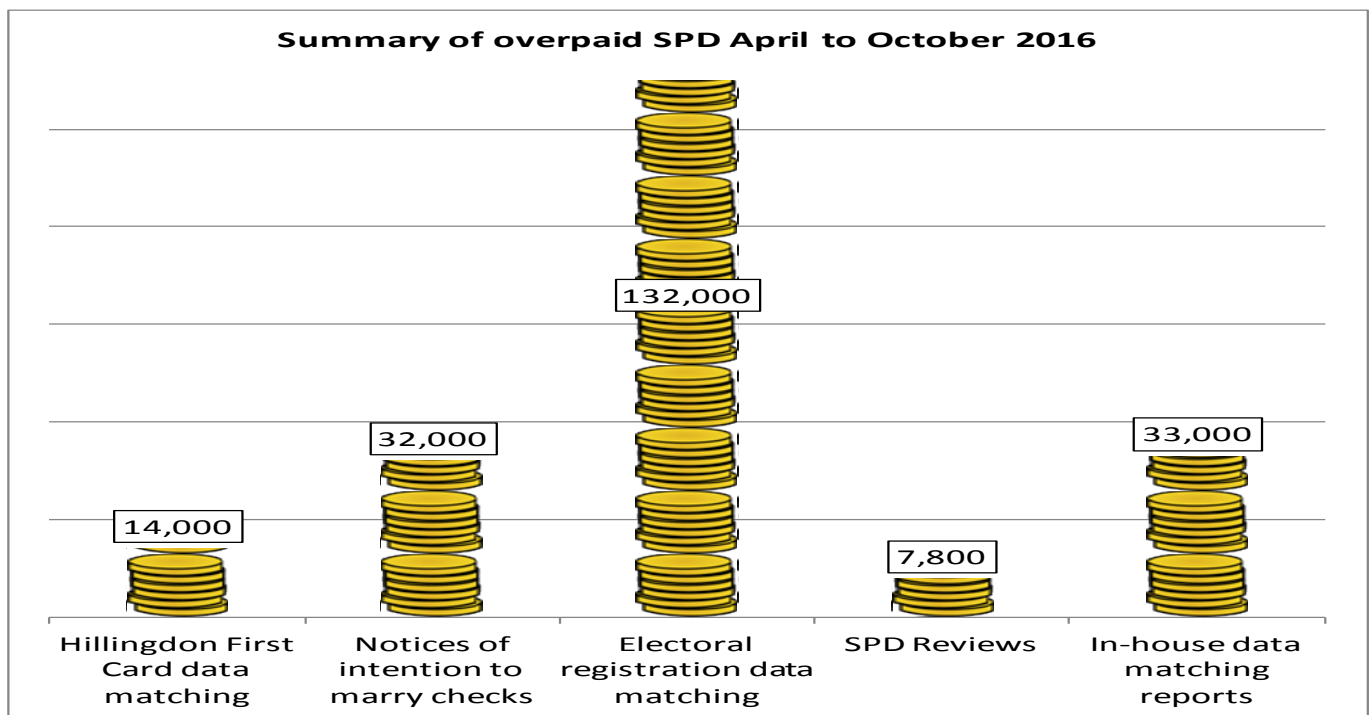
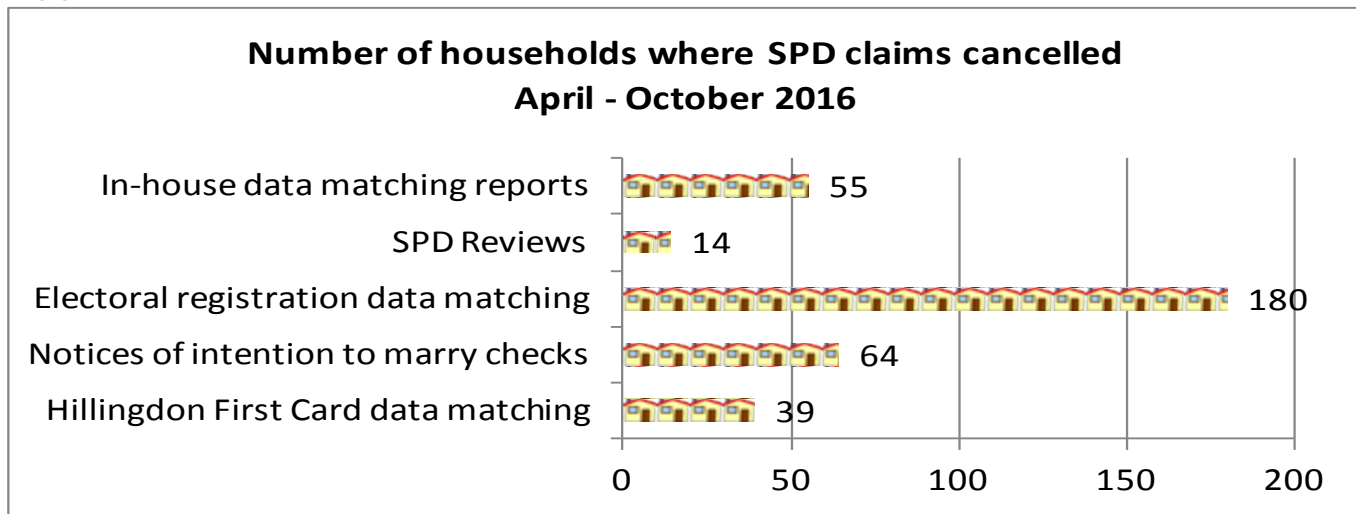


Chart 4



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



The poster opposite appears in issues of Hillingdon People and notice boards around the Borough to raise the profile of Single Person Discount abuse.

3.4 Residency and Verification checks.

The aim of this project is to prevent false 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.

Since April 2016 there have been 9 bed and breakfast accommodations recovered as they were unoccupied by clients who claimed to have been homeless.

The CFIT will continue to carry out unannounced visits to Bed & Breakfast/Temporary Accommodation to verify residency throughout the year. The average duration of a bed & breakfast placement is 20 weeks. Therefore for the 9 cancellations so far this year approximately £51,660 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.

From March 2016 the CFIT have taken over the responsibility of verifying the circumstances of people on the housing waiting list prior to their imminent offer of permanent accommodation. This is to ensure they are still eligible before the offer is made. The verification process put in place by the CFIT is more robust and includes a wider range of thorough checks. These checks are being processed quicker and are now carried out within 2 days. Verifications take place over a 24 hour period 7 days a week. The service provided has been well received by residents who have been grateful for the flexibility of visit times to suit their availability. To date 1288 verification checks have taken place. Of these 25 were found to not be eligible for housing support.

Table 4

Residency & Verification Check cancellations		
	YTD 2016/17	Savings per week
Temporary Accommodation Cancelled	9	★£2583
CFIT verification check	25	
Total savings		£51,660

★Average B&B placement = 20 weeks calculates to £51,660

3.5 Right to Buy

Since April 2016 the Corporate Fraud Investigation Team has verified 52 Right to Buy (RTB) applications. To date as a result of these verifications 3 RTB applications have been cancelled and a further 2 cases are under investigation. The RTB's have been cancelled for reasons of; non residency, a discrepancy about who was living in the property and funding arrangements. The total amount of discount saved from April is £595,530. The 2 other on-going investigations concern an applicant whose partner appears to have a tenancy with a Housing Association and the other case concerns a potential money laundering case where we are not satisfied on how the RTB application is being funded.

Table 5

Right to Buy Cancellations April to October 2016	
Cancelled Applications	Value of discount
3	£595,530

3.6 Proceeds of Crime Investigations (POCA)

The role of the Accredited Financial Investigator (AFI) 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. Hillingdon Council has two fully qualified AFIs.

Under the Home Office Incentivisation scheme, Hillingdon Council receives 37.5% of what it recovers. On 30 June 2016, Hillingdon Council received an incentivisation payment of £126,704.44. A further payment of £19,328.35 was received on 30 September 2016. We are due to receive an incentivisation payment of £5,062.50 on 31 December 2016. The actual amount received will be slightly less than this as the Home Office are currently top slicing all incentivisation payments in order to fund improvements to the Joint Asset Recovery Database and the Asset Confiscation Enforcement Teams.

Five cases are currently under investigation, three relate to breaches of planning control and two relate to breaches of trading standards legislation and are concerned with persons involved in the supply of counterfeit goods.

Preliminary enquiries are currently being made on a further four planning cases in order to assess whether or not they are suitable for confiscation under the Proceeds of Crime Act 2002. These cases relate to unlawful subdivisions of private dwelling houses and the erection of outbuildings, commonly known as beds in sheds.

A project team, comprising of officers from planning, trading standards, private sector housing and legal services, continues to identify and assess further suitable cases.

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 accurate data relating to current social housing needs for effective forward planning.

Since the project commenced on 27th 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 2,018 applications have been removed from the waiting list. Of these, 228 have been removed since April 2016. In the process of this exercise the CFIT has also identified 35 cases where the household has been incorrectly claiming Single Person Discount for Council Tax which totals £14.9k. This review project will be ongoing in 2016/17 to carry out enhanced checks on the remaining cases on the waiting list. At the 14th November there were 2,074 applications on the housing waiting list; this includes new people added to the list since the project began.

In November the project will begin a review of all Band C applications on the housing waiting list. The review will involve forms being sent to all relevant applicants; the returned information will be checked and verified. Any changes in housing need will be identified, appropriate action will be taken and applicants information updated.

3.8 Enhanced Recruitment Verification

HR presented a report which was approved by the Corporate Management Team in December 2015. A pilot project has been scheduled to commence in April 2017, 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 National Fraud Initiative (NFI)

The NFI is a vital tool in combating fraud; it facilitates the integration of thousands of data sets and records across participating agencies. Hillingdon is a key stakeholder in the initiative and provides data to enable the implementation of effective measures to prevent and safeguard public funds. The CFIT has provided data to the NFI who will carry out the matching process. In December and January data matches will be available to CFIT for investigation. Data has been provided to NFI on the following:

- payroll
- pensions
- trade creditors' payment history and trade creditors' standing data
- housing (current tenants) and right to buy
- housing waiting lists
- housing benefits (provided by the DWP)
- council tax reduction scheme
- council tax (required annually)
- electoral register (required annually)
- students eligible for a loan (provided by the SLC)
- private supported care home residents
- transport passes and permits (including residents' parking, blue badges and concessionary travel)
- insurance claimants
- licences – market trader/operator, taxi driver and personal licences to supply alcohol
- personal budget (direct payments)

3.10 Trading Standards

From April to October 2016 there were 183 new complaints and service requests recorded for action. This includes 7 cases of doorstep crime where elderly residents have been targeted by rogue traders. 40 complaints related to product safety, 13 to underage sales of age restricted goods such as alcohol and tobacco, and 12 to Intellectual property crime (counterfeiting). Work targeting some of our most complained about traders has also been carried out.

During this period, as part of our participation in the National Trading Standards Safety at Ports project for which Hillingdon receives funding, officers examined 46 consignments of imported goods at the freight sheds at Heathrow. The purpose of the project is to prevent unsafe consumer goods from entering the country, therefore stopping them before they reach the marketplace. Approximately 2400 unsafe or non-compliant items, worth £70k have been taken out of the supply chain. Often these are mixed goods consignments.

A recent example included toy remote control cars, video baby monitors and toy LED balloons. The remote control vehicles were of unsafe construction and had unsafe electrical chargers presenting an electric shock hazard.

The 1000 LED balloons failed the toy safety regulations as the mini lithium cell battery could be easily removed from the battery compartment presenting choking and ingestion hazard.

The unsafe goods were forfeited and destroyed.



The Trading Standards team are responsible for licensing premises for the safe storage of fireworks and explosives, There are 50 premises licensed to store explosives in the London Borough of Hillingdon, of which 48 relate to the storage of fireworks. Additionally 4 retailers are licensed to sell fireworks all year round (the sale of fireworks is otherwise restricted to certain times of the year). 18 premises (including all new applicants and premises wishing to store higher quantities) were visited to check for safe storage. 2 premises were asked to voluntarily surrender their licences because of difficulties in complying with requirements.

A recent successful Hillingdon prosecution case has been widely publicised in the press and Trading Standards journals. This was a high profile case involving money laundering and trademark offences. The following press release was issued.

Hayes market trader found guilty of money laundering

Hillingdon Council has successfully prosecuted a market trader from Hayes who was found guilty of money laundering and trademark offences at a three day trial at Isleworth Crown Court. An in depth investigation by the council's Trading Standards team found Harmohan Singh Nangpal of Langdale Drive, Hayes, in possession of a substantial quantity of counterfeit and non duty paid tobacco products.

Proceeds of more than £50,000 were found concealed in Nangpal's toilet, rubbish bin, under his mattress, including other parts of his home. More than 1,000 packets of cigarettes were seized from his garage along with 1,000 pouches of hand rolling tobacco. These bore counterfeit trademarks for brands including Marlboro, Benson & Hedges, and Golden Virginia.

Nangpal pleaded guilty to the possession of counterfeit tobacco but not guilty to the money laundering offences relating to the £50,000 seized.

The prosecution argued that this money was obtained through the sale of counterfeit tobacco and asserted that Nangpal had used money made from these illegal means to buy his house. The jury found him guilty on the money laundering charges.

The council is now using the Proceeds of Crime Act to recover the money made by Nangpal through his trade in counterfeit goods and he will be sentenced in 2017.

Counterfeit tobacco



3.11 Blue Badge

Two targeted operations in conjunction with the police took place in May and June. A proactive operation ran in Uxbridge town centre resulted in 53 badges checked; 1 penalty charge notice (PCN) was issued. This reactive operation was run as a result of reports received from Hillingdon residents. This operation focussed on badge abuse around a local school. The key suspect was identified, a PCN was issued and the Blue Badge was seized. Further operations are anticipated before the end of the financial year.

3.12 Bad Debts

In May the CFIT began working with the Council's Specialist Recovery Team (SRT). The CFIT have taken over cases where it proves difficult to recover the debt even after bailiff involvement. The CFIT have developed a comprehensive investigations process because of their enhanced access to external systems and availability to visit 24 hours a day 7 days a week.

Since the project started in May accounts owing a total of £43k now have direct debits set in place to repay this money.

Based on the success of this project since May the CFIT have set up a project team to manage an intelligence led approach to bad debts. The Team have developed a new risk assessment process to identify relevant cases. This will support case profiling, allowing the CFIT to effectively target resources to maximise revenue to the Council. This will commence in January 2017.

3.13 Students

Since April 2016 a new project to look at student council tax exemptions commenced. For the

2015/16 academic year there were 874 students registered as exempt from Council Tax in Hillingdon, the majority of these are Brunel students. The CFIT have negotiated access to the Brunel student database to facilitate data matching with the Council Tax student list. This matching has taken place from September with the new cohort of students. This has also assisted the eligible students with claiming the discount as the Council will already have notification from Brunel of their student status.

3.14 Unaccompanied Asylum Seekers (UAS)

In May 2016 the CFIT was asked by the Corporate Director of Children's Social Care to work with staff to verify the circumstances of asylum seekers financially supported by social care.

To date checks have identified 25 cases for investigation saving £117k. Another 12 cases are pending further information and are likely to result in savings.

Proactive visits have also highlighted clients who were not residing in the accommodation provided and cases where subletting had been identified. Visits are being made to all asylum seekers accommodation to verify occupancy.

The CFIT is currently arranging interviews with any UAS clients who have failed to pay their rent contribution to agree a payment plan in relevant cases.

All UAS cases are being reviewed by the CFIT to ensure all welfare benefits entitlements are being realised.

All the savings we have logged are based on payments that were due to be paid for this financial year 2016/17.

3.15 Benchmarking

Benchmarking would enable an assessment of the success of fraud detection in Hillingdon and judge the performance of the CFIT. Currently there is no readily available benchmarking data as this has not been a government requirement.

The CFIT is involved with 4 projects to facilitate bench marking

The CFIT in Hillingdon invited Fraud Manager from LB Brent, LB Ealing, LB Harrow and LB Hounslow to join them in a Sharing Good Practice Group. The Group met in November. From this meeting it was apparent that Hillingdon's fraud initiatives were more developed and cover a much wider remit. Therefore Hillingdon has lead on establishing key metrics for social housing as this was the only area the other Authorities were working on. All members of the group will collect data for 2016/17 and are scheduled to meet again in April 2017 to benchmark results.

The CFIT has also joined a Fraud Group meeting with non London Councils which includes Chiltern District Council, Wycombe District council and Hemel Hempstead to initiate benchmarking and sharing good practice. This Group have the first meeting at the end of November.

The Chartered Institute of Public Finance and Accountancy (CIPFA) are currently gathering some data from Local Authorities which will enable some benchmarking to take place. The CFIT Manager has been invited to meet with CIPFA in January to discuss how this could be developed. Hillingdon will be representing all local authorities as Hillingdon is recognised as a leading authority in this fraud detection with extensive initiatives.

The CFIT manager is an executive member of the London Borough Fraud Investigation Group. In this role the Manager has agreement to lead a Benchmarking Group with all London Councils to agree metrics and collect data for 2016/17.

Updates on benchmarking will be included in future reports.

4. CFIT Work Plan for 2016/17

The following Work Plan provides an indication of the CFIT planned work programme for 2016/17. The programme for 2017/18 will be included in the March Fraud update.

What difference will this make	
Housing	
Housing verifications	<ul style="list-style-type: none"> • Allocation to residents in genuine Housing need
Bed & breakfast checks	<ul style="list-style-type: none"> • Ensure residents eligibility to the service
Temporary accommodation	<ul style="list-style-type: none"> • Ensure residents eligibility to the service
Social Housing Fraud	<ul style="list-style-type: none"> • Recovery of unlawful use of Council properties • Allocation to residents in genuine housing need
Housing waiting list	<ul style="list-style-type: none"> • Ensure residents eligibility to the service, reduction in waiting list
Housing applications	<ul style="list-style-type: none"> • Ensure residents eligibility to the service • Allocation to residents in genuine Housing need
Right to Buy	<ul style="list-style-type: none"> • Ensure residents eligibility
Council Tax Revenue	
Single Person Council Tax Discount	<ul style="list-style-type: none"> • Ensure residents eligibility to the discount • Increased revenue
Student Council Tax discount	<ul style="list-style-type: none"> • Ensure residents eligibility to the discount • Increased revenue
Council tax inspections	<ul style="list-style-type: none"> • Increased revenue
Business rates inspections	<ul style="list-style-type: none"> • Increased revenue
Targeted projects	
Blue Badge checks	<ul style="list-style-type: none"> • Reduction in misuse of scheme, increase parking availability to genuine badge holders
Enhanced recruitment verification	<ul style="list-style-type: none"> • Suitable qualified staff recruited • Protect Council reputation • Reduction in recruitment costs
Proceeds of Crime investigations	<ul style="list-style-type: none"> • Increase revenue • Prevents future abuse
Recovery of bad debts	<ul style="list-style-type: none"> • Increase revenue
Data matching	<ul style="list-style-type: none"> • Increase revenue • Ensure residents eligibility to services
Trading Standards investigations	<ul style="list-style-type: none"> • Reduction in abuse of legislation, eg selling of illegal tobacco or alcohol
Mobile working	<ul style="list-style-type: none"> • Improved efficiency, increased checks and investigation capacity
Cross departmental working	<ul style="list-style-type: none"> • Ensure residents eligibility • Increase revenue • Appropriate use of Council funds