

# BUSINESS ASSURANCE

## **Counter Fraud Annual Report to Audit Committee: 2018/19**

**30<sup>th</sup> June 2019**



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## 1. Introduction

### 1.1 The Role of the Business Assurance Counter Fraud Team

- 1.1.1 The Business Assurance Counter Fraud Team (BACFT) 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 BACFT 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 BACFT also conducts 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 BACFT 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 2018/19 provides the Council's Corporate Management Team (CMT) and Audit Committee with information on the counter fraud work carried out during 2018/19. 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 Deputy Director of Exchequer & Business Assurance Services [DDEBA] to highlight any significant issues arising from the counter fraud work in 2018/19.
- 1.2.2 The Annual Report also highlights to CMT, the Audit Committee and other key stakeholders, the performance of the BACFT in meeting its strategic and operational objectives (as set out in the Counter Fraud Strategic Plan), which provides an opportunity for the DDEBA to be held to account in this respect.

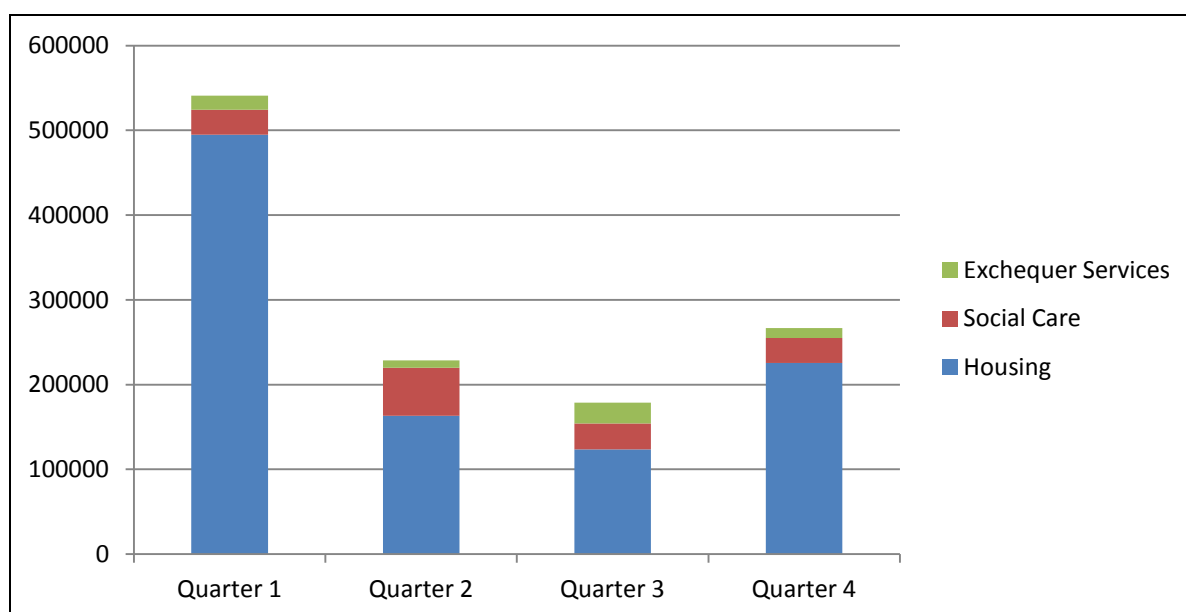
## 2. Executive Summary

- 2.1 In 2018/19 the BACFT achieved a number of successful outcomes against the backdrop of a number of major change and improvement initiatives within the team. This includes the **delivery of a total of £1.2m in loss prevention savings within Council services** and the introduction of new counter fraud work streams focusing on efficient, effective use of resource and a risk based approach to counter fraud work. This is a significant achievement in light of the challenge of delivering a **successful restructure of the BACFT**, started at the end of 2017/18 and the impact on resourcing this has had within Quarters 1 and 2.
- 2.2 In the area of Housing Services, the BACFT has focused significant counter fraud resource, carrying out successful proactive projects as well as ongoing investigations and verifications work. This has resulted in **£869k in loss prevention** and notional savings. As part of this work, the team has **recovered 19 council properties** and successfully **prosecuted two individuals for Right to Buy and non occupation fraud**. These results represent a key part of the work carried out by the team in 2018/19.
- 2.3 During 2018/19 the team has also carried out other counter fraud work, including proactive projects in the areas of Exchequer Services, Social Care and Blue Badges. This generated over **£111k in loss prevention savings** and **two prosecutions; one for a Blue Badge offence** and **one for Council Tax Reduction fraud**. The team has developed its collaborative approach with these service areas this year in an attempt to provide a more comprehensive counter fraud service across the whole of the council. The focus has continued to be on a risk based approach to tackling fraud and the 2018/19 results represent a solid base upon which to build more resilience against fraud in future years.

2.4 In 2018/19 the BACFT saw the successful introduction of a **Home Office Immigration Enforcement Officer (IEO)**. The IEO joined the team in April 2018 through a joint initiative with the Home Office to provide better access to Home Office data to assist local authority decision making where immigration status is an issue. Despite there being a cost to the Council for the IEO service, the prudent estimate of the return on this investment in terms of **loss prevention achieved for 2018/19 is three times the cost**. This loss prevention is made up of savings in a number of Council service areas, but mainly in Housing and Social Care. Due to this success, the BACFT has received agreement to continue with this initiative in 2019/20.

2.5 **Chart 1** below summarises the areas\* in which the BACFT has achieved loss prevention savings in 2018/19 by quarter. This clearly shows the emphasis placed in the area of Housing Services and provides context for where savings have been achieved throughout the year. A full breakdown of loss prevention savings can be found at **Appendix A**.

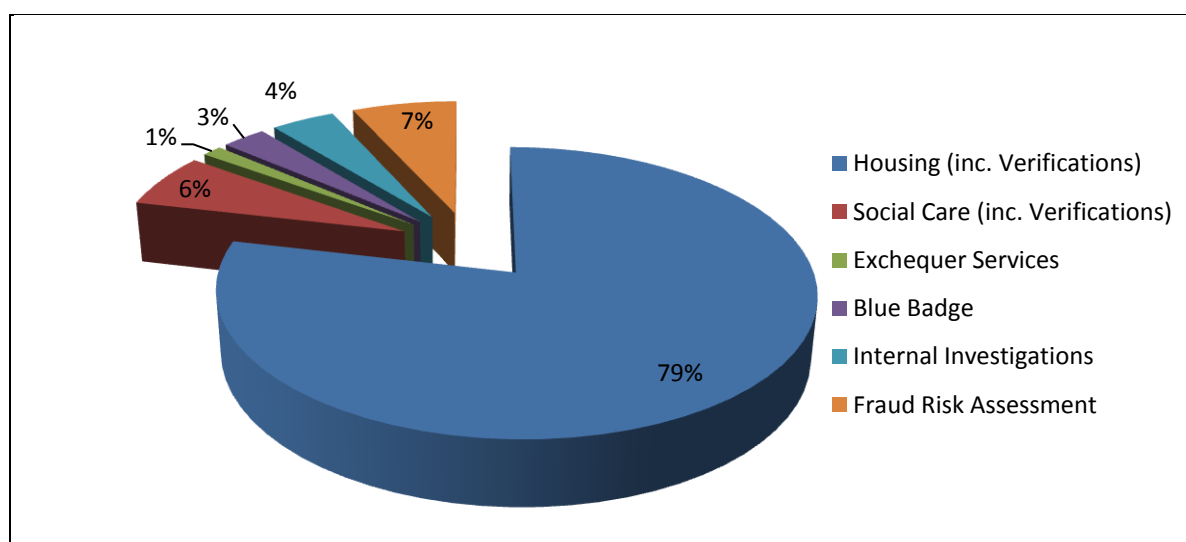
**Chart 1 - BACFT Loss Prevention Savings Achieved in 2018/19**



\* This includes savings generated through the work of the IEO

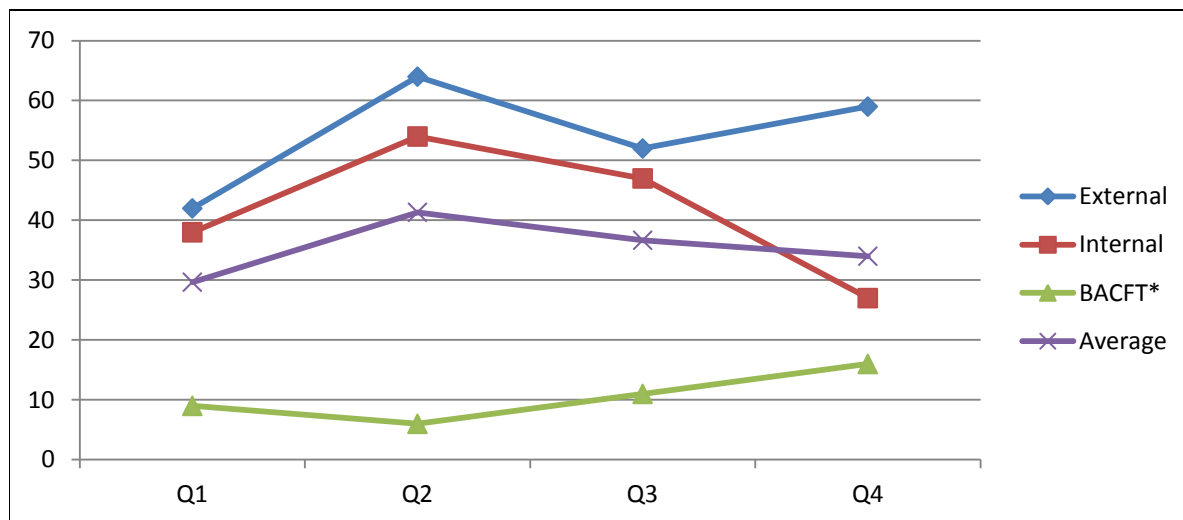
2.6 **Chart 2** below is a summary of the allocation of BACFT resource in 2018/19. This includes NFI data matching work within the allocation. This strongly correlates to the loss prevention savings outcomes, but also details the other areas in which resources have been allocated throughout the year. Note that outcomes for Exchequer Services are often a by-product of work primarily within Housing, which explains the lower resource allocation.

**Chart 2 - BACFT Allocated Resource in 2018/19**



- 2.7 In 2018/19 the BACFT received a total of **425 referrals for investigation** from both internal and external sources, including the fraud hotline and the online referral that was set up in year. In response to the numbers of referrals falling at the end of 2017/18 and into Quarter 1 of 2018/19, the team carried out a number of fraud awareness sessions with colleagues in key departments, such as Housing Services and Social Care. **Chart 3** below provides a summary of the trend of referrals over the year.

**Chart 3 - Number of 2018/19 Referrals by Quarter**



*\*Referrals generated through BACFT proactive projects or data matching exercises*

- 2.8 The DDEBA acknowledges that there are further improvements to be made in the number and quality of referrals received. Initiatives to address this, including a comprehensive fraud awareness campaign, are included in the 2019/20 Counter Fraud Strategic Plan.
- 2.9 During the year the team underwent a major restructure in order to achieve the right skills mix of resource to take forward the objectives of the Counter Fraud Strategic Plan 2019/20. This included a reorganisation of the management structure to create the strategic role of Head of Counter Fraud and to seek to increase the resource within the Intelligence and Verifications sub-teams and reduce the resource for criminal investigations. Despite this change, the team has **successfully prosecuted five cases of fraud in the criminal courts** during 2018/19.

### 3. Analysis of Counter Fraud Activity in 2018/19

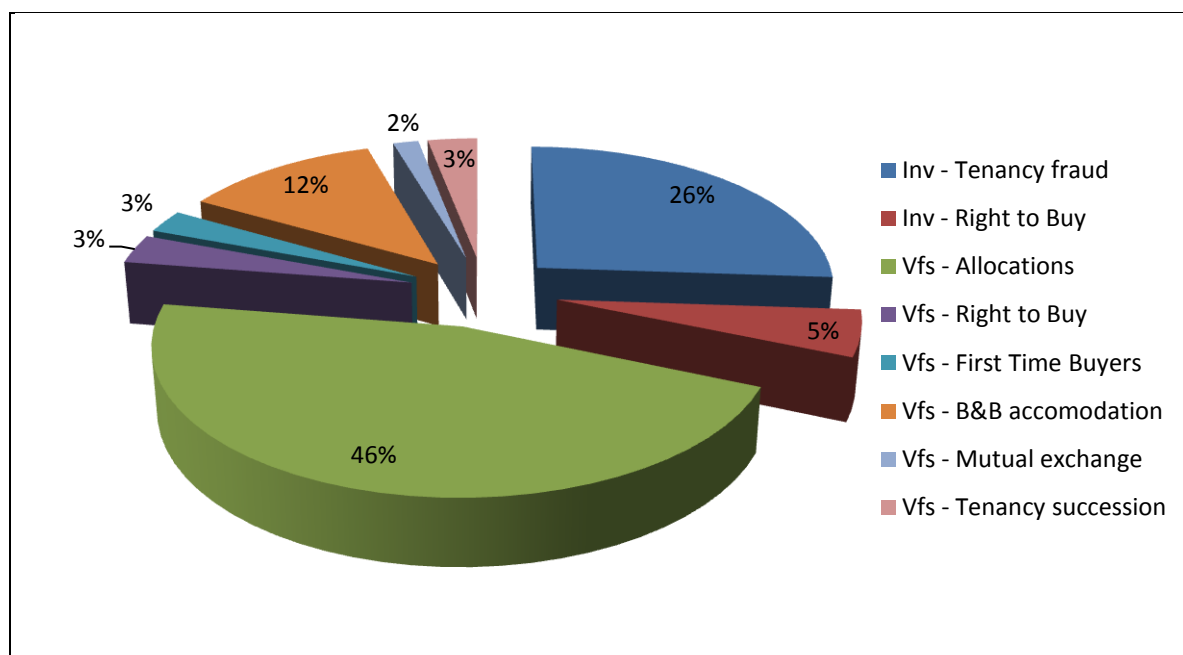
- 3.1 This section provides a more detailed analysis of the activities of the BACFT within 2018/19, detailing the specific work streams and the trends within each area for comparison and contrast. During the year the activities of the BACFT were predominantly focussed on four main fraud areas of work; **Housing, Social Care, Exchequer Services** and **Blue Badge**. The team also carried out several internal investigations during the year which at times includes investigations under the Council's Disciplinary Policy and Procedure, whilst ensuring full compliance with the Corporate Investigations Protocol.

#### 3.2 Housing Fraud

- 3.2.1 Housing Fraud continued to be the main area for work for the BACFT in 2018/19. The objective of this work is the prevention and detection of housing tenancy fraud, and providing assurance to key stakeholders that applicants' eligibility for housing services is properly verified, prior to being offered a tenancy. This work is conducted using information gathered by the Intelligence Officers and Verifications Officers in close liaison with Housing Services. This involves the team carrying out confirmation checks, which often includes un-notified visits to properties. The team also work with a variety of social landlords and statutory agencies to help detect fraud where information sharing protocols are in place, to try and ensure that those people living in Council properties are properly entitled.

3.2.2 The Council is exposed to a number of housing fraud risks, as highlighted in the Counter Fraud Strategy 2018/19 and as a consequence significant BACFT resource was deployed on the prevention and detection of housing fraud in 2018/19. **Chart 4** below details the allocation of BACFT resources in 2018/19 within the fraud risk area of Housing Services.

**Chart 4 - BACFT Work Within Housing Services in 2018/19**



3.2.3 **Chart 4** sets out the proportion of resource used to carry out Verifications (Vfs), which has been mainly within tenancy pre-allocation checks. This also highlights the work carried out in new areas of verification brought in within the year, such as Mutual Exchange and Tenancy Succession. This was as part of the CFT strategy in 2018/19 to provide a more comprehensive counter fraud and verifications coverage of Housing Services. To accommodate this, the verifications service was changed to a risk based approach which enabled resources to be deployed more strategically in the areas of highest risk. In 2019/20 it is expected that proportion of resource allocated to pre-allocation checks will remain high, but more verifications will be carried out in the other areas.

3.2.4 Per **Table 1** below, in 2018/19 the BACFT directly recovered **19 Council properties**. The team also contributed to the wider number of properties recovered this year throughout Housing Services, as properties can be identified as abandoned or sub-let in a variety of ways, and not always by a direct counter fraud referral. The number of properties directly recovered by the BACFT has continued to reduce over the last three years. This is as a result of the success by the BACFT in tackling tenancy fraud and increasing fraud awareness. Specifically, as the BACFT's focus on this area has become more widely known across the borough, the number of properties being sub-let has significantly reduced, which is in line with Council's fraud prevention strategy.

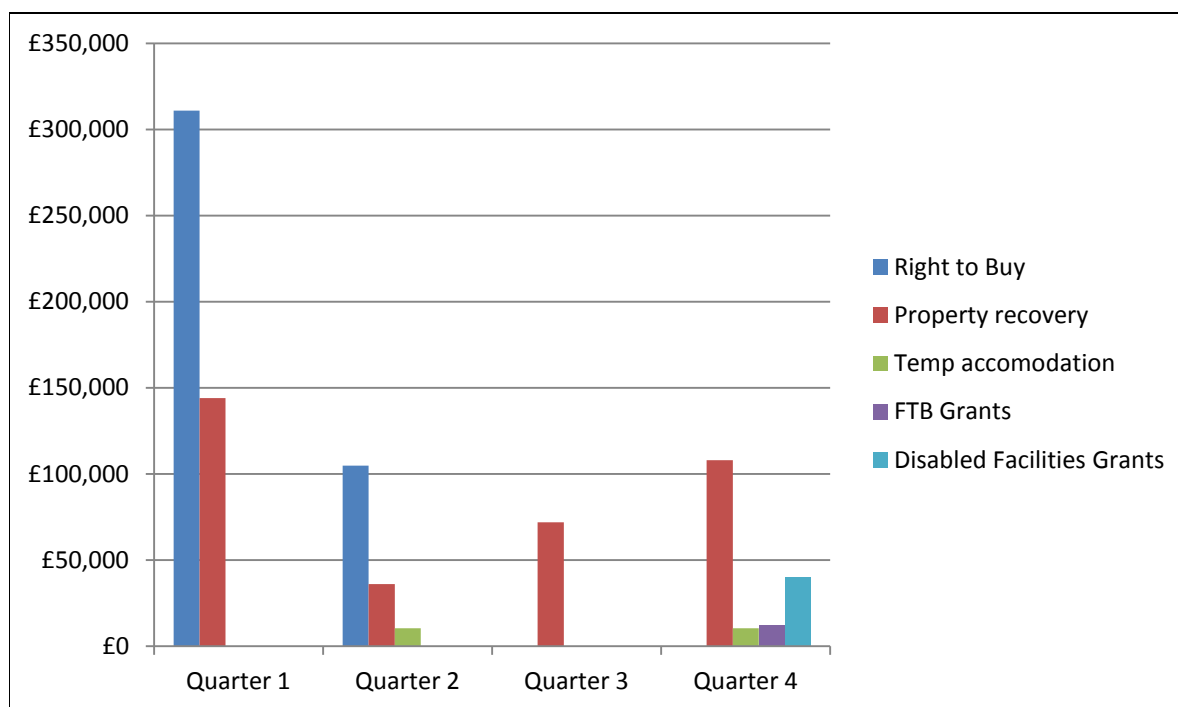
**Table 1 ~ Housing Tenancy Fraud Cases**

Housing Tenancy Fraud	2018/19		2017/18		2016/17	
	Cases	£k/value**	Cases	£k/value	Cases	£k/value
Total number of recovered properties	19	£342k	43	£774k	64	£1,152k

\*\* = In 2014, the Audit Commission reported the national average temporary accommodation costs to Local Authorities for one family as **£18k per property**. We continue to use this prudent estimate for reporting purposes, although across London a number of authorities are reporting that the true cost of each tenancy fraud case is more accurately estimated as **£94k per property** and some as high as **£150k per property** as a representation of property replacement costs.

3.2.5 The BACFT's work within Housing Services has made a major contribution to the loss prevention outcomes of the team and represents the single biggest allocation of counter fraud resource within the council. **Chart 5** below summaries the loss prevention outcomes of the team by area. Some of these outcomes are notional, such as the recovery of properties, as outlined in **Table 1** (on previous page). Others are a loss prevention outcome where the team has prevented expenditure, such as with accommodation that has been closed or 'Right to Buy' discounts, or a direct cashable saving where the Council has recovered, or will recover funds.

**Chart 5 - BACFT Loss Prevention Outcomes in Housing 2018/19**



3.2.6 Per **Table 2** below, in 2018/19 the BACFT has successfully identified **799** housing tenancy allocation cases for rejection. Performance in this area has been consistent in terms of the number of verifications that have been undertaken and the number of cases that have been rejected. Of the **799** cases that have been rejected, **38** applications have been completely closed down. Without these BACFT enhanced verification checks, these applications are likely to have been successful and the applicant would then have been housed in a Council property that they are not entitled to.

**Table 2 ~ Housing Tenancy Verification Cases 2018/19**

Housing Tenancy Verification Cases	Q1	Q2	Q3	Q4	Total
Total number of cases reviewed	351	396	690	472	<b>1,909</b>
Total number verified as accurate	238	224	377	271	<b>1,110</b>
Total number rejected	113	173	312	201	<b>799</b>
% identified by BACFT for rejection	<b>32%</b>	<b>44%</b>	<b>45%</b>	<b>43%</b>	<b>42%</b>

### 3.3 National Fraud Initiative

3.3.1 The National Fraud Initiative (NFI) is a data matching exercise co-ordinated by the Cabinet Office (CO) which is carried out every 2 years. It matches electronic data from 1,300 organisations, including councils, the Police, hospitals and almost 100 private companies. This helps to identify potentially fraudulent claims and errors. In November 2016 the CO reported that the NFI had helped identify almost £198m in fraud and errors in England.



3.3.2 NFI exercise data matches for Hillingdon were received for 2018/19 during the first week of February 2019. Since that point, data sets have been gradually being returned in a staggered approach through into 2019/20. The team has continued to work through the data matches identified for 2017 and 2019.

3.3.3 The results for the NFI **loss prevention work in 2018/19 were savings of £7,246**, including the recovery of a Council property. Moving forward, in line with the Counter Fraud Strategic Plan 2019/20 approved by CMT and the Audit Committee, the BACFT will place greater emphasis on the use of data matching and analytics. This will help to further prevent and detect fraud against local taxpayers' money and to identify increased loss prevention opportunities.

### 3.4 Blue Badge Fraud

3.4.1 The Council is committed to preventing and detecting Blue Badge Fraud through the work of the BACFT. Although the direct monetary value of Blue Badge Fraud is relatively low, the reputational risk in relation to this area is significant for the Council.

3.4.2 In 2018/19 the approach in this area was to carry out proactive 'operations' targeting areas of highest risk for parking offences. BACFT officers in plain clothes checked the badges of all vehicles parking within a disabled bay, or on yellow lines and displaying a blue badge. This is to ensure that the badge holder is present or is being collected, but also to ensure that the badge is genuine.

3.4.3 In the 2018/19 year, the approach was to carry out one Blue Badge proactive operation per quarter. The results for the year were as follows:

- 5 proactive operations targeting high risk areas;
- 296 blue badges checked by BACFT officers;
- 12 criminal investigations resulting in a sanction imposed for misuse;
- 9 financial penalties issued following investigation; and
- 1 criminal prosecution for a more serious case with the offender being ordered to pay £3,500 in costs to the Council.

3.4.4 Since the BACFT commenced proactive Blue Badge operations in 2018, the recorded **instances of misuse of Blue Badges in the borough have been significantly falling in number**. This reflects positively on how the Council tackles blue badge fraud and provides reassurance to residents that fraud in this area will not be tolerated by the London Borough of Hillingdon. This initiative increases public awareness of the BACFT's work across the borough and also inspires community confidence. The BACFT will continue to carry out proactive work in this area in 2019/20.

### 3.5 Counter Fraud Proactive Projects in 2018/19

3.5.1 Part of the BACFT's approach to tackling fraud, is to carry out focused proactive projects within service areas where there is the highest risk of fraud and financial loss. This enables to BACFT to focus resource on where it is likely to have the biggest impact, and also gives assurance over areas of council expenditure that is at a high risk.

3.5.2 Per **Table 3** over the page, the BACFT carried out three main proactive counter fraud projects in 2018/19 (not including Blue Badge operations). Detailed within the table is the rationale behind each project and its outcomes. These projects represent a significant achievement for the BACFT in terms of implementing the risk based methodology and demonstrating the value in undertaking project work as a proactive measure to prevent financial loss and detect fraud. Further proactive project work is planned for 2019/20 as detailed in the Counter Fraud Strategic Plan.



**Table 3 ~ Proactive Counter Fraud Projects 2018/19**

Proactive Project & Rationale	Project Outcomes
<b>Social Care - Section 17 Expenditure</b> This is an area of high expenditure and high risk for the Council. Section 17 (S17) funding of accommodation is used in emergency situations where a person cannot be accommodated by other means. It is high risk because of the significant cost of emergency accommodation and the risk that it will be misused by the recipient.	<ul style="list-style-type: none"> <li>• Number of cases reviewed - <b>53</b></li> <li>• Number of cases validated - <b>50</b></li> <li>• Cases recommended to cease funding - <b>3</b></li> <li>• Loss prevention through stopping funding - <b>£24,974</b></li> </ul>
<b>Social Care - Unaccompanied Asylum Seeking Children (UASC)</b> As with S17, this area of expenditure within social care is high risk due to the likelihood of accommodation funded for UASC cases being misused. The cost of accommodation is high and assurance is needed that expenditure continues to be needed.	<ul style="list-style-type: none"> <li>• Number of cases reviewed - <b>85</b></li> <li>• Number of cases validated - <b>67</b></li> <li>• Cases recommended to cease funding - <b>18</b></li> <li>• Loss prevention through stopping funding - <b>£134,316<sup>1</sup></b></li> </ul>
<b>Housing Services - Tenancy fraud</b> The objective of this project was to verify that Council properties are lawfully occupied. This exercise helped identify fraud being committed through subletting or non-occupation. Our work in this area led to the recovery of Council properties and the identification of associated loss preventions e.g. Council Tax discounts.	<ul style="list-style-type: none"> <li>• Number of tenancies reviewed - <b>327</b></li> <li>• Tenant occupation verified - <b>304</b></li> <li>• Number unable to verify - <b>22</b></li> <li>• Number of investigations opened<sup>2</sup> - <b>12</b></li> <li>• Properties returned<sup>3</sup> - <b>1</b></li> <li>• Other notable outcomes - <b>£40k DFG loss prevention</b></li> </ul>

<sup>1</sup> This figure was reported in the BACFT Progress Report for Q2 of 2018/19, but did not feature in the cumulative loss prevention savings figures reported for Q3 and Q4 2018/19.

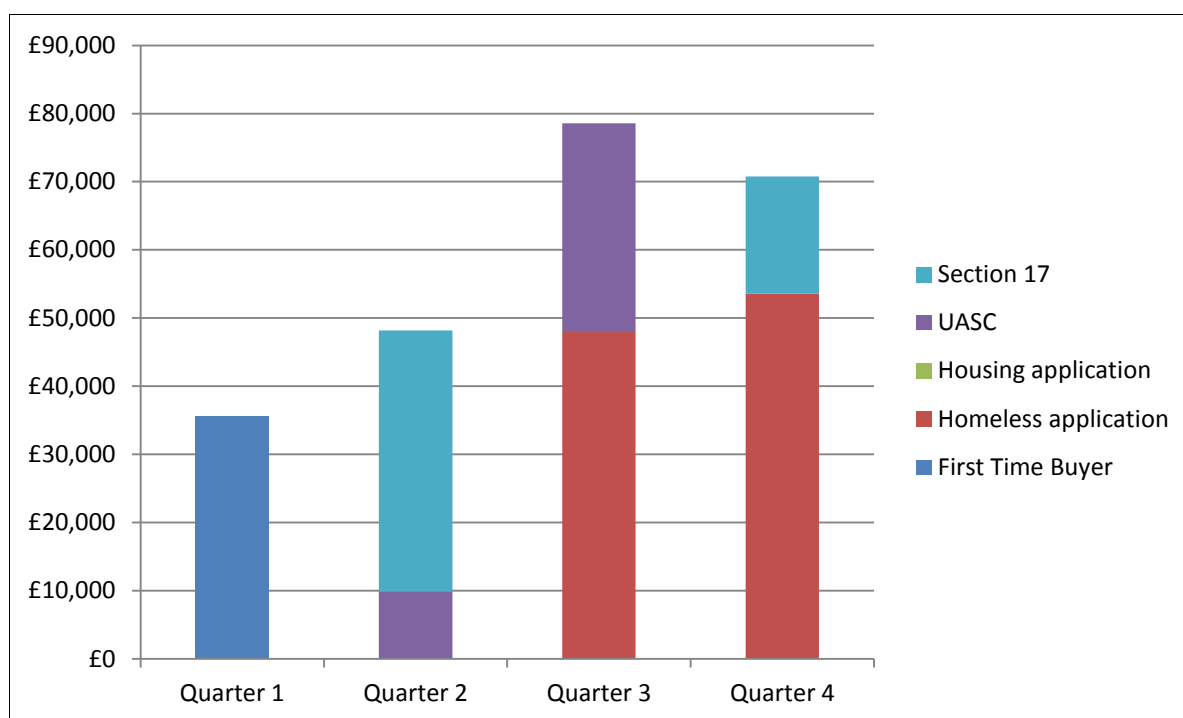
<sup>2</sup> These investigations are ongoing as at 31 March 2019.

<sup>3</sup> Indications are that properties returned from the project will increase and be reported as part of 2019/20 progress.

### 3.6 Immigration Enforcement Officer (IEO)

3.6.1 Since 16<sup>th</sup> April 2018, the BACFT has had a Home Office IEO working as part of the team. The purpose is to provide enhanced access to Home Office data for the purpose of assessing cases involving immigration status and for assisting in counter fraud work. A number of challenges had to be overcome in the initial integration of the IEO into the BACFT and working together with other Council departments. A key part of this was ensuring the visibility of the IEO to the wider Council and enabling the capture of comprehensive management information about the value of the IEO's work. This has been successfully achieved through working closely with key departments to embed a process for working with the IEO and making sure that outcomes are accurately recorded.

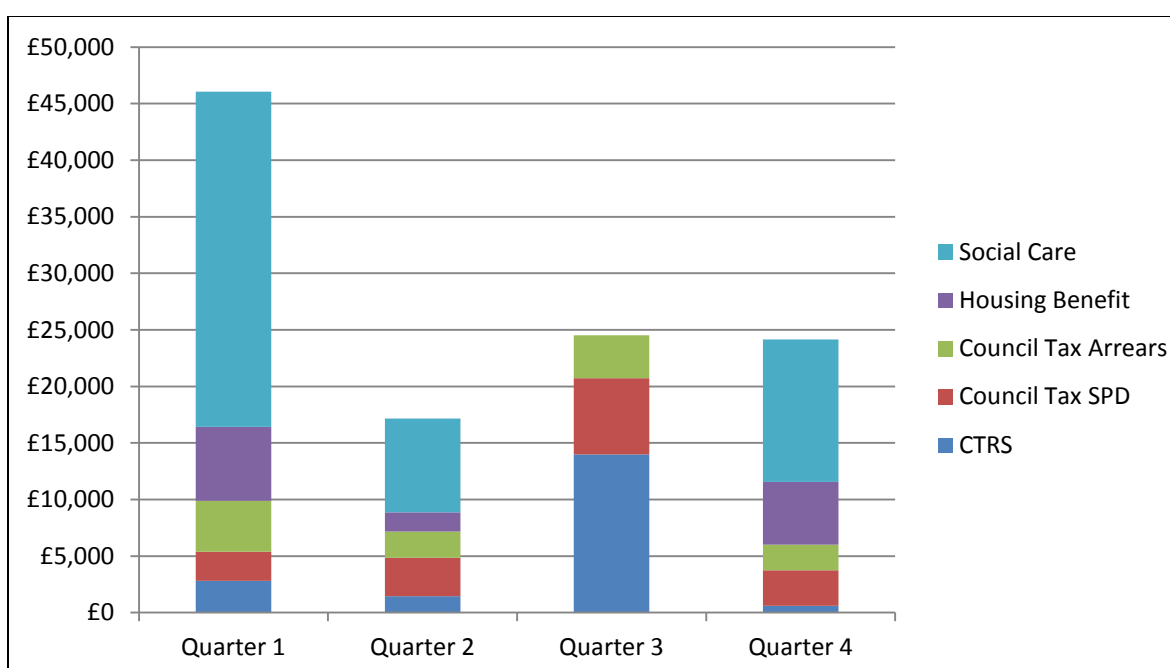
3.6.2 **Chart 6** over the page summarises the outcomes for the work of the IEO within 2018/19. This is based on prudent estimates of the costs of Council services that are linked to immigration issues where the IEO has been able to directly assist with by providing Home Office information. The total value of the IEO work for 2018/19 is prudently estimated at **£233,208** which represents a significant return on the investment by the Council. As a result, the IEO will remain working within the BACFT for 2019/20.

**Chart 6 - IEO Loss Prevention Outcomes 2018/19**

### 3.7 Other Counter Fraud Work in 2018/19

3.7.1 Throughout 2018/19, the BACFT was active in carrying out investigations and verifications work within Social Care and Exchequer Services. This included reactive investigations into allegations of fraud within social care funding as well as identification of savings within Council Tax and the Council Tax Reduction Scheme. As a consequence of the team's work in partnership with Exchequer Services, overpayments of Housing Benefit have been identified, as well as aiding the collection of Council Tax arrears.

3.7.2 **Chart 7** below provides detail on the year's results for loss prevention savings outcomes within Council services areas not already detailed within this report. The BACFT recognises that more work is needed to develop these work streams and intends to provide a comprehensive counter fraud coverage across all service areas in 2019/20 and beyond as detailed in the Counter Fraud Strategy.

**Chart 1 - Other Loss Prevention Savings 2018/19**

- 3.7.3 Other notable achievements for the BACFT in 2018/19 was the updating of all counter fraud related policies, including the **Prosecution & Sanctions Policy**, **Whistleblowing Policy**, **Anti-Money Laundering Policy**, **Anti-Bribery Policy**, **Surveillance Policy** and the **Corporate Investigations Protocol**. These were approved by CMT and Audit Committee during Quarter 4 and are in the process of being finalised and circulated to key stakeholders by the DDEBA.

#### 4. Analysis of the Counter Fraud Team Performance 2018/19

- 4.1 The BACFT introduced KPIs for the first time at the beginning of the 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 DDEBA to be better held to account by CMT and Audit Committee. Attached at **Appendix B** is **Table 5** which sets out the performance by the BACFT against the KPIs throughout 2018/19.
- 4.2 As can be seen from **Table 5**, it is acknowledged that there is more work that can and will be done to improve performance against targets. The team's performance is in the main on an upward trend throughout the year, but with specific areas to focus on early in the new financial year. Performance should also be considered against the context of recruitment/vacancies within the team which is ongoing and the fact that overall performance for the year was noted by CMT and the Audit Committee as very good. Further, **Table 4** at **Appendix A** provides a summary overview of the loss prevention performance of the team in 2018/19 in relation to the different areas of counter fraud activity.
- 4.3 During 2018/19 the BACFT has sought to obtain data from each London Borough relating to counter fraud activity and produced benchmarking information which is set out at **Table 6** (see **Appendix C**). This data relates to reported figures in counter fraud reports to oversight committees for 2017/18. It is worth readers of this report noting the 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 more challenging. Nevertheless, there are several areas of generally commonality (as set out in **Table 6**), including the performance on housing fraud and blue badge which are present across most London Boroughs.

#### 5. Forward Look

- 5.1 Looking ahead to 2019/20, the BACFT, as part of the Council's Counter Fraud strategy, will continue to focus on the areas of highest fraud risk to the authority. This will be done by identifying new and ongoing fraud risks through continued engagement with service areas on fraud issues, and facilitating fraud risk analysis for the Council through the 'Fraud Universe' and fraud risk workshops. The BACFT's main objective is to seek the most beneficial counter fraud outcomes for the Council through intelligent use of data and fraud analysis, and the strategic use of counter fraud resource.
- 5.2 Moving ahead, there are a number of key priorities for the BACFT. These include:
- Lead on the Council joining the **London Counter Fraud Hub** ensuring that the Council is fully prepared to take advantage of all opportunities presented;
  - Complete the reintegration of the Exchequer Services **Revenues Inspections function** into the counter fraud verification work streams;
  - Continue to review current **counter fraud work-streams** to ensure the effective use of resources, seeking opportunities to **maximise loss prevention opportunities** for the Council through targeting the areas of highest fraud risk;
  - Continue **engagement with key stakeholders through fraud awareness and fraud risk workshops, and an organisation wide fraud awareness campaign** to further promote the counter fraud culture within the Council;

- Carry out **internal data matching processes** to assist in the prevention and detection of fraud and continue work on **external data matching exercises through the NFI**;
- Complete recruitment to the remaining vacancies; the two **Senior Verifications Officers** and two **Intelligence Officers** within the team; and
- Progress **joint working with the Department for Work and Pensions** on matters involving both Housing Benefit and Council Tax Reduction fraud in order to maximise loss prevention in this area.

5.3 The BACFT 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 during 2018/19.

**Muir Laurie FCCA CMIIA**

**Deputy Director of Exchequer & Business Assurance Services**

30<sup>th</sup> June 2019

**APPENDIX A****Table 4 ~ BACFT Loss Prevention Performance 2018/19**

Work area	Description	Q1	Q2	Q3	Q4	Total
<b>Housing</b>	Right to Buy discounts	£310,800	£104,900	£0	£0	<b>£415,700</b>
	Property Recovery (notional)	£126,000	£36,000	£72,000	£108,000	<b>£342,000</b>
	Other loss prevention	£22,320	£12,042	£2,547	£63,808	<b>£100,716</b>
	Prosecution costs	£0	£10,353	£1,000	£0	<b>£11,353</b>
<b>Social Services</b>	Loss Prevention	£29,610	£8,308	£0	£12,603	<b>£50,520</b>
<b>Revenues</b>	Council Tax Reduction	£2,803	£1,459	£14,000	£596	<b>£18,861</b>
	Single Person Discount	£2,597	£3,386	£6,712	£3,053	<b>£15,748</b>
	Council Tax Arrears	£4,483	£2,312	£3,793	£2,277	<b>£12,865</b>
	Housing Benefit Overpayments	£6,547	£1,698	£0	£5,534	<b>£13,778</b>
<b>Blue Badge</b>	Simple Caution & Financial Penalty	£0	£100	£700	£100	<b>£900</b>
	Prosecution Costs Received	£0	£0	£3,500	£0	<b>£3,500</b>
<b>Immigration Enforcement Officer</b>	Housing First Time Buyer scheme*	£35,646	£0	£0	£0	<b>£35,646</b>
	Housing Homelessness Applications**	£0	£0	£47,978	£53,581	<b>£101,559</b>
	Asylum Seeking Children Expense ***	£0	£9,933	£30,604	£0	<b>£40,537</b>
	Social Services Section 17 Expense **	£0	£38,271	£0	£17,195	<b>£55,466</b>
	<b>IEO Sub Total</b>	<b>£35,646</b>	<b>£48,204</b>	<b>£78,582</b>	<b>£70,776</b>	<b>£233,207</b>
<b>Totals</b>	Loss Prevention	£376,056	£161,412	£78,582	£123,379	<b>£739,427</b>
	Notional Savings	£150,547	£37,698	£72,000	£113,534	<b>£373,778</b>
	Cashable Savings	£14,203	£19,198	£27,052	£29,734	<b>£90,191</b>
	Costs awarded/ penalties	£0	£10,453	£5,200	£100	<b>£15,753</b>
	<b>Total</b>	<b>£540,806</b>	<b>£228,762</b>	<b>£182,834</b>	<b>£266,747</b>	<b>£1,219,149</b>

\* First time buyers - Average grant given per person based on 2016/17.

\*\* Average weekly cost against average length of support. This figure fluctuates but has been provided by the Council's business performance team.

\*\*\* Cost of accommodation and subsistence per week for one year. This figure is a prudent estimate as the Council can and does often support asylum seeking children until they are 25 years old.

**APPENDIX B****Table 5 ~ BACFT KPIs and Actual Performance 2018/19**

BACFT KPIs	Target	Q1	Q2	Q3	Q4	Year
1. Percentage of fraud referrals risk assessed within 3 working days	95%	36%	51%	89%	86%	66%
2. Verification work timescales for completion:						
a. Housing Allocations completion within 3 working days	95%	88%	89%	92%	91%	90%
b. First Time Buyer completion within 5 working days	95%	N/A	71%	100%	100%	90%
c. Right to Buy completion within 28 working days	95%	N/A	N/A	58%	50%	54%
3. Housing Bed and Breakfast clients verified every 40 working days	95%	N/A	N/A	97%	N/A <sup>1</sup>	97%
4. Investigation plan completion within 5 working days of case allocation	95%	N/A	25%	87%	90%	67%
5. Tenancy fraud referrals received resulting in property recovery	20%	33%	8.6%	16%	16%	18%
6. Investigations resulting in sanction (prosecution/penalty/caution)	10%	1%	4.5%	14%	4%	6%
7. Investigations resulting in loss prevention/financial saving outcome	25%	16%	16%	33%	24%	22%

<sup>1</sup> BACFT are no longer visiting B&B accommodation on a rolling programme and will instead be conducting two proactive visit projects during the financial year.

**APPENDIX C****Table 6 ~ Counter Fraud Benchmarking 2017/18**

London Borough	Social Housing Properties Returned	RTB Cancelled	Housing Applications Closed	Council Tax Savings (Exemptions, Discounts & Council Tax Reduction)	Blue Badge Successful Outcomes
Barking & Dagenham	12	0	N/Av	N/Av	N/Av
Barnet	61	45	N/Av	N/Av	N/Av
Bexley	9	0	95	N/Av	17
Brent	38	1	N/Av	£8,206	N/Av
Bromley	1	0	1	N/Av	66
Camden	105	12	N/Av	N/Av	25
City of London	16	7	5	N/Av	1
Croydon	19	4	49	N/Av	22
Ealing	18	2	1	N/Av	N/Av
Enfield	59	16	N/Av	£18,800	N/Av
Greenwich	39	0	1	N/Av	N/Av
Hackney	66	14	40	N/Av	28
Hammersmith & Fulham	25	52	25	N/Av	229
Haringey	55	0	N/Av	N/Av	N/Av
Harrow	13	12	5	£8,150	N/Av
Havering	31	23	N/A	N/A	N/Av
<b>Hillingdon</b>	<b>43</b>	<b>7</b>	<b>56</b>	<b>£150,452</b>	<b>2**</b>
Hounslow	2	8	1	£24,753	19
Islington	N/Av	N/Av	N/Av	N/Av	N/Av
K&C	20	31	31	N/Av	65
Lambeth	60	1	N/Av	£48,370	24
Lewisham	14	0	155	N/Av	N/Av
Newham	5	16	1	N/Av	N/Av
Redbridge	5	2	N/Av	£41,000	N/Av
Southwark	0	1	N/Av	N/Av	N/Av
SRKMW (SWLFP)	8	8	19	£4,800	24
Waltham Forest	39	86	N/Av	N/Av	N/Av
Westminster (CWH)	21	57	29	N/Av	23

N/Av = Data Not Available for 2017/18

\*\* = Successful Outcomes for Blue Badges are defined as Fines and/or Prosecutions, but excluding seized badges. The BACFT did not introduce fines until Quarter 2 of 2018/19