

BUSINESS ASSURANCE

Counter Fraud Progress Report to Audit Committee:

2021/22 Quarter 2

28th October 2021



HILLINGDON
LONDON

www.hillingdon.gov.uk

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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, there is also a range of preventative work that the team is responsible for carrying out. This includes fraud awareness training and ensuring the Council have up-to-date and appropriate investigation policies and procedures.

1.2 The Purpose of the Counter Fraud Progress Report

- 1.2.1 The Counter Fraud Progress Report provides the Council's Corporate Management Team (CMT) and Audit Committee with summary information on all counter fraud work carried out during the Quarter 2 period (1st July to 30th September 2021). In addition, it provides an opportunity for the Head of Counter Fraud (HCF) and the Deputy Director of Exchequer Services & Business Assurance (DDESBA) to highlight any significant issues arising from the counter fraud work in Quarter 2 (Q2).
- 1.2.2 The progress 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 HCF and DDEBA to be held to account in this respect.

2. Executive Summary

- 2.1 With the Government's Covid 19 restrictions lifting in July 2021, the BACFT has resumed full operational activity in Q2. This has had a positive impact on visiting functions and direct engagement with the public, as well as contributing to the most financially successful quarter since the introduction of the risk-based approach to counter fraud at Hillingdon. **A total of c£1.5m in loss prevention savings have been achieved in just this quarter alone**, across Housing, Revenues and Social Care. This brings the total year to date loss prevention savings to over c£1.8m and has led the team to exceeding its annual financial target of £1.5m at the halfway stage and is **on course to record its most successful year ever**. This quarter's results are an excellent achievement and highlights the innovative ways the BACFT are tackling fraud risks to maximise loss prevention.
- 2.2 Due to the Covid-19 restrictions which made it difficult to visit domestic properties, the BACFT concentrated on revenues maximisation and using data matching to identify unlisted business premises. As a result, a total of c£1.2m in loss prevention savings have been identified in this area during Q2. This is predominantly made up of **3 undeclared businesses that have now been billed more than £1.1m**, following a robust investigation which utilised council data sets and open source intelligence gathering. This is a significant identification of legitimate council revenue and validates the advantages of taking a proactive risk-based approach to focus on revenue maximisation. With a greater utilisation of technology, open source intelligence and internal information, we are confident that further positive outcomes can be achieved in this area.
- 2.3 The DDESBA is pleased to report that after a robust internal and external recruitment exercise, **Alex Brown has been appointed as the new permanent Head of Counter Fraud (HCF)**. Following this, the DDESBA and HCF are now considering how best to fill the current SIU Counter Fraud Manager vacancy to ensure the continued development of the SIU and how the unit supports the BACFT in meeting its strategic objectives.

- 2.4 After a **three-year criminal investigation into a 10-year tenancy fraud** by the BACFT, both suspects in the case have been prosecuted. Mr Mockford and Mrs Bailey pleaded guilty to two counts of fraud each and both were sentenced to 120 hours unpaid work and ordered to pay a £500 penalty. Additionally, Mr Mockford was handed a **9-month suspended prison sentence**. The outcome of this investigation has been published on the Council's website and social media platforms and sends a clear message that Hillingdon Council will not hesitate to act against fraudsters.
- 2.5 Efforts to continue tackling tenancy fraud led to the successful recovery of a further **7 Council properties** and the cancellation of **1 Right to Buy (RTB)** application. Loss prevention savings totalling **£234k** have been achieved during Q2. A total number of **17 properties** have been recovered during the first half of the financial year. BACFT Officers continue to investigate a further **106** cases of suspected tenancy fraud and are confident of further successful outcomes over the remainder of the financial year.
- 2.6 Two Blue Badge proactive projects were undertaken at **Ruislip Lido** car parks and surrounding residential areas. Concerns had been raised by local Councillors over the summer, which led to the scheduling of the proactive projects. These operations resulted in the seizure of **8 Blue Badges** and formal investigations being opened in **4 instances, with 1 of the offenders receiving a Fixed Penalty Notice of £100** and a **Simple Caution**.
- 2.7 Q2 saw the introduction of a **new Home Office Onsite Immigration Official (OSIO)**. The new OSIO is in post and based at the Civic Centre to provide onsite support and assistance for any immigration related queries. This resource continues to be made available on a part time basis. A communication campaign was launched to reiterate the return of the OSIO function in an onsite capacity and to encourage staff to utilise the services he can provide, to assist with their decision-making processes. Despite the new OSIO not starting the role until late in Q2, the OSIO has identified financial loss prevention savings of over £9k within Housing during the quarter.

3. Analysis of Counter Fraud Activity in Quarter 2

3.1 Housing Fraud

- 3.1.1 The BACFT has continued to carry out positive counter fraud work within Housing services during Q2. As Covid-19 restrictions have eased, and other services across the Council have returned to some form of normality, there has been a **90% increase in referrals** from internal departments such as Housing services, Contact Centre and other frontline services. The courts continue to prioritise the most serious of cases, which has had an impact on the BACFT's ability to evict tenants for tenancy fraud related matters. However, as time goes on, the team is noticing an improvement in the availability of court dates and the timely way they are available.
- 3.1.2 In Q2 the BACFT was able to conclude a **three-year housing investigation** which resulted in a **successful criminal prosecution**. The investigation, which was opened from an anonymous referral, uncovered a **10-year tenancy fraud** involving the sub-letting of a **4-bedroom house**. The tenant and her son both pleaded guilty to offences and were sentenced, in addition the son was given a **9-month suspended prison sentence**. This is a positive outcome for the BACFT and for all departments involved, who assisted with this investigation.
- 3.1.3 As per **Table 1** over the page, the BACFT has **recovered 7 Council properties** during Q2. There are **106 ongoing investigations** into suspected housing fraud, consisting of non-occupation, sub-let and wrongful succession. From these investigations the BACFT have instigated **legal proceedings for 9 of these cases** with Notices being served in each instance.

Table 1 ~ Housing Tenancy Fraud Cases

Housing Tenancy Fraud Cases	2021/22*		2020/21		2019/20	
	Cases	£k/value**	Cases	£k/value	Cases	£k/value
Total number of properties recovered	17	£306k	22	£396k	28	£504k
Total number of ongoing cases	106	£1,908k				

* As at 30th September 2021.

** 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 large 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.

- 3.1.4 The Key Performance Indicator (KPI) 4 (refer to **Table 5** in **Appendix A**) targets an outcome of a Council property to be recovered for 20% of tenancy fraud referrals received. The BACFT has continued to investigate housing fraud effectively with **26% of tenancy fraud referrals resulting in property recovery** (ref KPI 4 at **Appendix A**).
- 3.1.5 The BACFT continues to carry out checks on all **Right to Buy (RTB) applications** submitted to Housing. The RTB process is a statutory scheme whereby a tenant(s) can apply to purchase their property at a significant discount from its market value. There are strict conditions that must be met by the applicant(s) if they are to qualify for the discount. In Q2 the BACFT has prevented **1 fraudulent RTB application, leading to loss prevention savings of £108k**. A further **7 cases of suspected RTB fraud** are currently being investigated.
- 3.1.6 In Q1 the BACFT reported the commencement of the **Temporary Accommodation (TA) proactive project** within Housing. During Q2 the BACFT have conducted unannounced visits to TA properties to verify the details of the current residents, ensuring that any changes of circumstances are reflected in internal systems. This project provides key stakeholders, including the Housing department with positive assurance that TA properties are being lawfully occupied in line with part VII of the Housing Act 1996. Following the recent conclusion of this project, a total of 457 visits to 192 properties were conducted. The BACFT has opened **12 investigations** for suspected non-occupation or subletting, of which **4** of these investigations have already resulted in legal proceedings. Further updates on the outstanding investigations will be available in Q3.
- 3.1.7 The BACFT have also commenced a Q2 proactive housing project involving **outstanding gas safety inspections**. Working collaboratively with internal departments including Housing, Repairs and Legal Services, the BACFT is conducting unannounced visits to those properties that have overdue gas safety checks. The purpose of this project is to reduce the number of properties that have outstanding gas safety checks of 12 months or longer, whilst also identifying potential cases of non-occupation or sub-letting. So far, **47 properties have been visited**, with 19 visits resulting in successful doorstep appointments and a further 6 appointments being made via telephone or email from carrying out enquiries using alternative data systems. Further updates will be available in the next progress report.
- 3.1.8 Although the council no longer offers the First Time Buyer (FTB) scheme, the BACFT continues its **fraud prevention work** by carrying out periodic unannounced post-sale residency checks on properties purchased through the scheme. The conditions of the scheme specify that the homeowner(s) must occupy their property for the first 36 months after purchase to retain the grant.

- 3.1.9 Following a programme of residency checks conducted the BACFT has **3 FTB cases under investigation for sub-letting**. These post sales checks will continue for those already in receipt of the grant.
- 3.1.10 Per **Table 2** below, the BACFT as part of its prevention activity carry out eligibility checks on applicants who register for social housing. In Q2 the BACFT has **completed 511 verifications**, these checks include gathering information on an applicant's income, savings, assets, as well as their current housing situation.

Table 2 ~ Housing Tenancy Verification Cases

Housing Tenancy Verification Cases	Q1	Q2*	2021/22*	2020/21
Total number of cases reviewed	756	511	1,267	2,010
% identified by BACFT for rejection	29%	24%	26%	31%
Total number of applications closed	1	3	4	14

* As at 30th September 2021.

- 3.1.11 In Q2 a further **3 housing tenancy applications** have been completely closed. Applications are closed due to a range of reasons, such as they no longer have a housing need, they have no immigration status, they own a property elsewhere or they have over the threshold in savings or assets. Without the BACFT's enhanced verification checks, these applicants may have been successful in obtaining a council property that they were not entitled to.
- 3.1.12 KPI 2a (refer to **Table 5** in **Appendix A**) targets an **outcome of 95%** of Housing allocation verifications to be completed within the target date set by the Housing department. In Q2 the team has successfully achieved **99% of verifications** being completed within their target date.

3.2 National Fraud Initiative & Internal Data Matching

- 3.2.1 The National Fraud Initiative (NFI) is a data matching exercise co-ordinated by the Government Cabinet Office and conducted every 2 years. The NFI matches data from over 1,200 organisations, including councils, the police, hospitals and almost 100 private companies to identify potential fraud and error. In the year to date, the BACFT has identified loss prevention **savings more than £32k** in this area. Most of these savings were due to residents continuing to claim **Single Person Discount** when they were no longer entitled to do so. Further results are expected to filter through during Quarter 3 and will be reported accordingly. The BACFT are currently in discussions with NFI regarding **new data matching initiatives** to identify fraud and loss across a variety of fraud risks. These discussions are in their infancy but further updates will be included in future BACFT progress reports.

3.3 Revenues Fraud & Inspections

- 3.3.1 Per **Table 3** (over the page), the Revenues Investigation Unit (RIU) has **conducted 2,344 inspections during Q2, with 2,280 (97%) completed within the 10-day target**. There has been a consistent improvement over the course of the year and the team has worked hard to improve its efficiency and achieve the KPI target. The removal of visiting restrictions during Q2 has allowed the RIU to resume its full duties. This has also coincided with a strong loss prevention performance for the RIU in Q2. The team will continue to focus on revenue maximisation to identify high value loss prevention savings. (refer to **Table 6** at **Appendix B**).

Table 3 ~ Revenues Inspections Performance 2021/22

Revenues Inspections	Q1	Q2*	2021/22*	2020/21
Total number of inspections completed	1,887	2,344	4,231	6,005
Percentage within 10 day target	94%	97%	96%	59%

* As at 30th September 2021.

- 3.3.2 Proactive project work has continued to identify '**Beds in Sheds**' within the borough during Q2. 'Beds in Sheds' is the term used to describe habitable outbuildings, or annexes to private properties being utilised without the awareness of the Council or the Valuation Office Agency (VOA). BACFT officers conducted proactive inspections covering 4 roads in a specific part of the borough. A total of **194 properties** were visited and **7 properties** were identified as having self-contained outbuildings or annexes. The details of these properties have been shared with the VOA and the financial outcomes will be reported in Q3. As a result of these visits, **119 properties** require no further action as officers were satisfied that the outbuilding could not be considered as self-contained accommodation. A total of **68 properties** require further inspection visits to be conducted.
- 3.3.3 Outside of the proactive project the BACFT have identified a further **6 previously unlisted outbuildings**, resulting in over **£13k of loss prevention savings** during this quarter. An additional **3 outbuildings** have also been identified and their financial outcomes will be reported in Q3. Beds in Sheds will remain a key area of focus for the BACFT, with further proactive visits planned to continue for the remainder of the year.
- 3.3.4 During Q2 the BACFT continued to **focus on maximising revenue for the Council**. Using council indices, open source intelligence gathering and external data the BACFT identified **3 businesses** that were not listed for NNDR. The investigations on all 3 businesses have concluded, and all the relevant evidence was sent to the VOA. It was confirmed by the VOA that all 3 businesses should be brought into rates, and this has resulted in **over £1.1m of loss prevention savings**. Although only 15% of this is retained by the council, this is a substantial amount of revenue and highlights the importance of proactive intelligence led investigations in this area of work. The BACFT will be aiming to further develop utilising technology and other internally held data. This is a vital area of work for the BACFT as businesses have **no legal obligation** to inform the council that they are trading. Every unlisted business is a potential loss of legitimate revenue to the council.
- 3.4 New Homes Bonus Empty Property Project**
- 3.4.1 The New Homes Bonus (NHB) is a grant paid by central government to the Council to incentivise local housing growth. It is based on the extra council tax revenue raised for new build homes, conversions and long-term empty homes brought back into use. During Q2 the BACFT has worked to identify properties that were classified as long-term empty and are now occupied.
- 3.4.2 A total of **985 properties** were initially listed as unoccupied. Following internal systems checks and intelligence gathering, unannounced visits were conducted to the properties where occupancy could not be determined from information held internally. As a result of the internal systems interrogation and the visiting programme, **418 properties** were identified as occupied. This area of work carried out jointly with Exchequer Services directly increases the amount of grant money received by the council.
- 3.4.3 As a result of the New Homes Bonus project, **2 beds in sheds, 3 potential HMO's (House of Multiple Occupancy), 2 incorrect SPD claims and 1 potential previously unlisted business** were subsequently identified. This information was shared with the appropriate council teams and the financial outcomes will be reported in Q3.

3.5 Social Services

- 3.5.1 The BACFT has continued its loss prevention and counter fraud activity within the **Financial Assessment Team (FA)**. The **new financial assessment verification process** that was introduced in Q1 has seen a large increase in verification requests by the FA Team, with these increasing from **35 requests during Q1 to 91 requests in Q2**.
- 3.5.2 This means tested assessment which the council is under a financial and legal obligation to carry out, assesses each service user's eligibility to receive financial support from the council towards the cost of their care. The verification process enables BACFT officers to identify anomalies including, hidden income, capital, or assets and verify information supplied by each service user. Of the **91 verifications** processed by the team this quarter, **5 cases are undergoing further checks**, with outcomes expected to be reported in Q3.
- 3.5.3 Q2 saw the commencement of the BACFT's first proactive project within financial assessments, with a primary focus on service users who have no recourse to public funds (NRPF). The care costs for both residential and non-residential care are extremely high, with the council being liable for the full cost for users identified as not being able to access public funds.
- 3.5.4 The NRPF project was conducted to ensure that the financial support provided by the council was still required, by verifying the service user's immigration status within the UK and establishing their entitlement to claim and access public funds. Up-to-date status checks were carried out on all **8 cases, with 1 service user found to have access to public funds**. This resulted in the case being re-assessed and the service user contributing towards the cost of their care, identifying **£1.7k in loss prevention savings**.
- 3.5.5 The BACFT has continued its efforts to combat fraud within Direct Payments by encouraging the reporting of suspected cases both internally and externally. This has included utilising social media platforms with the '**FraudAwarenessFriday**' hashtag and Fraud Awareness sessions.
- 3.5.6 Direct Payment applicants can only receive assistance if they have been assessed as needing care and support services, with payments made to allow applicants to access care to meet their needs. The cost of financially supporting these cases can have a great effect on the council's finances due to the considerable cost that such services present. There are currently **3 direct payments cases under investigation**.
- 3.5.7 The council offers a wide range of financial support and schemes for people with disabilities, such as the **Disabled Facilities Grant (DFG)**. This means tested scheme allows eligible applicants to receive financial support from the council to make changes to their home, if they, or someone living at the property is disabled. The BACFT carries out investigations into suspected cases of fraud within the scheme as part of the counter fraud coverage within Social Care. There are currently **5 cases under investigation**, with 2 of these cases being linked to ongoing tenancy fraud investigations.
- 3.5.8 One of the preventative measures to mitigate against the risk of fraud and error within Children's Social Care for the allocation of emergency accommodation under Section 17 of the Children's Act 1989 is the BACFT verification process. This new process aims to validate a family's reason for approach and their financial circumstances, as they are claiming to be destitute and requiring accommodation and or financial support.
- 3.5.9 This desktop process includes confirming the applicant's immigration status and whether they qualify to receive emergency accommodation and support. Whilst the volume of approaches and verification requests are lower than other areas, **Table 4** (over the page), demonstrates the effectiveness of the work carried out in this area. As a direct result of this robust process, the BACFT was able to evidence in one case that **two bank accounts** had not been disclosed with one account containing **£10k**. This resulted in the application being closed and **saving c£13k in accommodation costs**.

Table 4 ~ Section 17 Verification Cases 2021/22

Section 17 Verification Cases	Q1	Q2*	2021/22*	2020/21
Total number of cases reviewed	5	7	12	N/A
Total number verified as accurate	4	6	10	N/A
Total number of cases closed	1	1	2	N/A
Loss Prevention Savings	£13,128	£13,128	£26,256	N/A

* As at 30th September 2021.

3.6 Blue Badge

- 3.6.1 Blue Badge permits provide parking concessions for people with severe mobility problems. In 2019 the scheme's eligibility was extended to people with less visible conditions. Residents that have been diagnosed with autism and/or mental health conditions are now able to apply for a Blue Badge.
- 3.6.2 Q2 saw the BACFT coordinate **two proactive Blue Badge operations** within the parking management schemes at Ruislip Lido and surrounding residential area. These operations followed on from residents approaching their local Councillors, where they expressed their concerns that visitors to the area were fraudulently using Blue Badges and not abiding to the parking management schemes enforced by Parking Services.
- 3.6.3 To maximise coverage and provide reassurance to residents and Councillors, both operations were held during peak times during the week and on a weekend, with BACFT officers deployed alongside Parking Enforcement Officers to determine the scale of the issue raised.
- 3.6.4 A total of **50 Blue Badges** were inspected during these operations. This led to the seizure of **4 badges due to potential Blue Badge misuse** with a further **4 expired badges** also seized. A **Simple Caution** and a **Fixed Penalty Notice** was administered to **1 of the offenders**, with the remaining **3 cases** currently under investigation.
- 3.6.5 The visible presence of officers operating during weekends, demonstrated to residents that the BACFT will take the appropriate action against Blue Badge misuse and ensure legitimate badge holders are able to park and enjoy one of the boroughs most popular attractions.

3.7 Onsite Immigration Official

- 3.7.1 The BACFT has had a Home Office Onsite Immigration Official (OSIO) working as part of the team since April 2018, providing enhanced access to Home Office data for the purpose of assessing cases involving immigration issues and for assisting in a range of counter fraud work.
- 3.7.2 A new permanent OSIO has been recruited by the Home Office and has returned to working onsite at the Civic since mid-September. It is our strongly held belief that an onsite visible presence provides a deterrent to potential false approaches whilst also encouraging staff to utilise the service. As part of the **communication campaign** to relaunch the OSIO service, the BACFT had a feature included in a recent **All Staff Email**. This highlighted the OSIO's working hours, how a referral can be made and included a link to the referral form/ the OSIO's contact details. A further email was sent to **key stakeholders** in Housing, Social Services and HR advising them of recommencement of the onsite service and encouraging their staff to utilise the OSIO.

- 3.7.3 The OSIO has contributed loss prevention savings of c£9k in Q2 (refer to **Table 6** in **Appendix B**). These savings are in relation to clients who had approached Housing Services for assistance but were subsequently found to be ineligible due to their immigration status. The BACFT is hopeful of a significant increase in the number of referrals following the OSIO's return to onsite duties, which will lead to much greater loss prevention financial savings moving forward.

3.8 Other Counter Fraud Activities

- 3.8.1 Working closely with colleagues from **Planning Enforcement, Licencing and the Anti-Social Behaviour (ASB)** teams, the BACFT were part of a **joint operation to tackle complaints** raised by residents in part of the borough. Their complaints related to the activities of several businesses based in a multi-use yard causing **noise and ASB**. A joint operation was organised with officers from each team attending the site to ascertain the circumstances relating to the complaints that had been raised. As a result of this intervention, **several previously unlisted businesses** were identified. These businesses will be added to the Council's ratings list and the financial savings will be reported in Q3. **Further enforcement action** is being undertaken by the other council teams involved. This highlighted the benefits of a collaborative approach when dealing with instances of illegal or unlawful behaviour and provides reassurance to residents that such behaviour will not be tolerated.
- 3.8.2 The BACFT has continued to support colleagues from the **Community Safety Team** and have taken part in the monthly **Targeted Problem-Solving days**. These targeted days aim to highlight problem areas within the borough which have been identified by residents, businesses, and local Councillors. The areas of Hayes, West Drayton and Eastcote were selected to be part of this proactive drive in Q2. The different enforcement teams would flood the area with officers to tackle the myriad of issues that had been raised.
- 3.8.3 As part of the continued commitment to create a strong counter fraud culture within the organisation, the team has delivered fraud awareness training sessions to colleagues in other services. In total, **4 Fraud Awareness sessions** have been delivered across **Technical Admin** and **Housing Services** with further sessions planned for Technical Admin and to Library staff in Q3. The increase in engagement via the Fraud Awareness Programme has had a direct positive impact on the increase of referrals received.

4. Analysis of the Counter Fraud Team's Performance in Quarter 2

- 4.1 Attached at **Appendix A** is **Table 5** which sets out the performance by the BACFT against the eight KPIs in Q2. Also attached at **Appendix B** is **Table 6** which provides an overview of the financial performance of the team in Q2 within each of the main areas of counter fraud activity.
- 4.2 The BACFT have achieved a consistent level of performance across the majority of the KPIs, with **7 of the 8 KPIs at or above targeted performance**, whereas **1 is red**. Staff and management have continued to focus on performance following the success of Q1. The management team are confident this level of performance can be sustained throughout the financial year.

5. Forward Look

- 5.1 In Q3 the BACFT will undertake a proactive visiting programme to all shared accommodation occupied by **Unaccompanied Asylum Seeking Children (UASC)**. The aim of the project will be to identify possible non occupation or sub-letting of any accommodation. There is currently a high demand for accommodation for certain social care service users. The team will verify the circumstances of each UASC including their immigration status to potentially free up accommodation that is being used fraudulently.

- 5.2 With the new permanent **OSIO** now in place, the BACFT will be exploring opportunities to offer **document verification training** to staff within service areas such as Housing, HR and Social Services. The OSIO will also re-commence the **UASC status check** project that had been put on hold due to Covid-19 working arrangements.
- 5.3 The BACFT will be looking to utilise **International Fraud Awareness Week (November 14th–20th)** to continue to raise fraud awareness and shine a light on fraudulent behaviours. A planned programme of social media posts and internal communications will form part of our stakeholder engagement. Information on common types of fraud and fraud prevention advice will also be shared to enlighten residents and staff alike. Fraud Awareness sessions will be arranged and conducted for teams within **Technical Admin and Library Staff**. Contact has been made with colleagues within **Procurement** regarding potential proactive counter fraud activity. This will likely lead to planned works in this area later in 2021/22.
- 5.4 **The BACFT will continue to prioritise revenues maximisation** and is currently in the planning stages of a new proactive project in conjunction with Exchequer Services. Both departments will work closely with two external suppliers who will utilise external data sets to identify residential premises and businesses the Council are not aware of.
- 5.5 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 this quarter. There are no other counter fraud matters that the DDESBA needs to bring to the attention of CMT or the Audit Committee at this time.

Muir Laurie FCCA CMIIA

Deputy Director of Exchequer Services & Business Assurance

28th October 2021

APPENDIX A**Table 5 ~ BACFT KPIs and Actual Performance**

BACFT KPIs	Target	Q1	Q2*	21/22*	20/21
1. Percentage of fraud referrals risk assessed within 3 working days	95%	100%	100%	100%	87%
2. Verification work timescales for completion:					
a. Housing Allocations completion within the target date set by Housing	95%	99%	99%	99%	95%
b. First Time Buyer completion within 5 working days	95%	100%	N/A**	100%	33%
c. Right to Buy case completion within 28 working days	95%	100%	100%	100%	100%
3. Investigation plan completion within 5 working days of case allocation	95%	100%	96%	98%	90%
4. Tenancy fraud referrals received resulting in property recovery	20%	39%	26%	30%	41%
5. Investigations resulting in sanction (prosecution/penalty/caution)	10%	13%	5%	8%	5%
6. Investigations resulting in loss prevention/financial saving outcome	25%	46%	55%	48%	39%
7. Revenues inspections completed within 10 days of raising	95%	94%	97%	96%	59%

* As at 30th September 2021.

N/A**- KPI has been retired as the scheme has disbanded.

APPENDIX B**Table 6 ~ BACFT Quarter 2 2021/22 ~ Financial Performance**

Work Area	Description	Quarter 1	Quarter 2	2021/22*
Housing	Right to Buy discounts	£0	£108,000	£108,000
	Property Recovery (notional savings)	£180,000	£126,000	£306,000
	Other savings/loss prevention	£0	£4,122	£4,122
Social Services	Section 17 and UASC**	£27,775	£13,128	£40,903
	Financial Assessments and Direct Payments	£0	£1,754	£1,754
	Disabled Facilities Grants	£30,000	£0	£30,000
Revenues	Single Person Discount	£3,247	£37,172	£40,419
	Council Tax Reduction	£4,930	£4,081	£9,011
	Beds in Sheds	£12,367	£13,202	£25,569
	Housing Benefit Overpayments	£23,312	£41,419	£64,731
	NNDR***	£5,866	£1,165,672	£1,171,538
Blue Badge	Simple Caution & Financial Penalty	£500	£100	£600
Immigration Officer	Housing Homelessness Applications**	£0	£9,999	£9,999
	Social Care Savings	£20,303	£0	£20,303
Totals	Loss Prevention Savings	£78,078	£132,882	£210,960
	Notional Savings	£203,312	£167,419	£370,731
	Cashable Savings	£26,410	£1,223,250	£1,249,659
	Costs awarded and penalties	£500	£1,100	£1,600
	Total	£308,299	£1,524,650	£1,832,949

* As at 30th September 2021.

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

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