
Counter Fraud Annual Report to Audit Committee: 2021/22

24th June 2022



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1. Introduction

1.1 The Role of the Counter Fraud Team

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

1.2 The Purpose of the Counter Fraud Annual Report

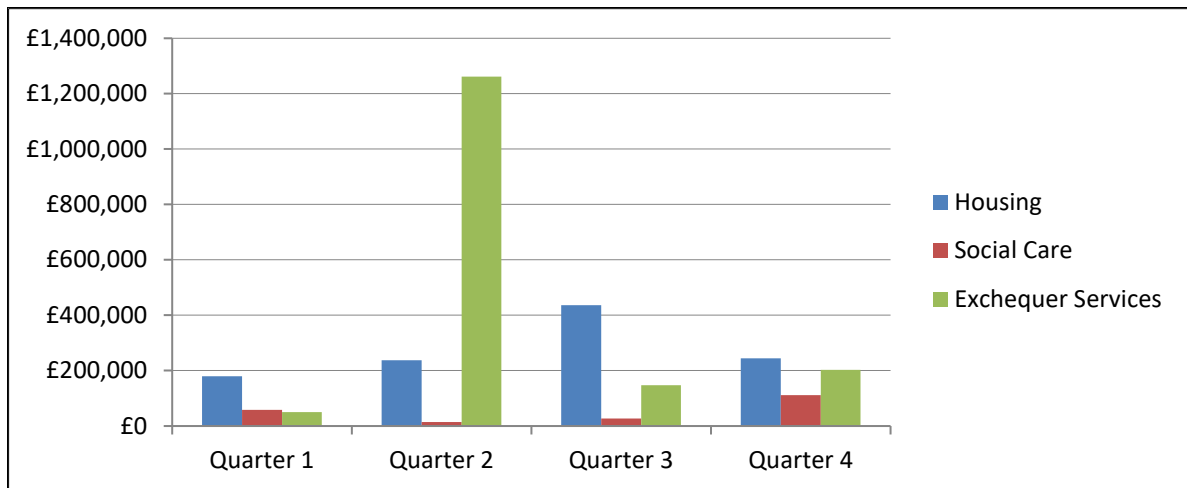
- 1.2.1 The Counter Fraud Annual Report 2021/22 provides the Council's Corporate Management Team (CMT) and Audit Committee with information on the counter fraud work carried out during 2021/22. It summarises for CMT and the Audit Committee the key findings from the quarterly progress reports presented during the year. In addition, it provides an opportunity for the Head of Counter Fraud (HCF) to highlight any significant issues arising from the counter fraud work in 2021/22.
- 1.2.2 The Annual Report also highlights to CMT, the Audit Committee and other key stakeholders, the performance of the CFT in meeting its strategic and operational objectives (as set out in the Counter Fraud Strategic Plan), which provides an opportunity for the HCF to be held to account in this respect.

2. Executive Summary

- 2.1 In 2021/22 the CFT and the Council continued to face challenges, operating in a post pandemic world with the lingering effects of Covid still ever present. Despite this, the CFT managed to exceed its financial target of £1.5m, **delivering total savings of c£3.04m across Council services. This represents the CFT's most successful year ever**, which in part, can be attributed to the team's new initiatives in Revenues Maximisation.
- 2.2 Throughout 2021/22 the CFT operated with an interim staffing structure in place, due to various vacancies across the team. In Q4 the CFT carried out a **small-scale restructure of the team**, with the objective of increasing officer capacity and reducing management resourcing to ensure the team could meet its strategic objectives in 2022/23. The restructure has led to the creation of a fourth sub team, the **Data Analytics Unit**, which is responsible for intelligence gathering, data matching and the use of technology to identify fraud, loss and error. Recruitment is underway and the HCF expects the CFT to be fully resourced by the middle of Q2 2022/23.
- 2.3 As in previous years, 2021/22 has seen the main area of work for the CFT to be within **Housing Services**, with the team conducting civil and criminal investigations into suspected cases of housing fraud, alongside proactive loss prevention projects. This has achieved overall **loss prevention savings of c£1.09m**, which represents a **59% increase** of the previous year's total (2020). These savings included the **recovery of 42 Council properties** due to tenancy fraud, this represents a **52% increase** of the previous year's outcomes (2020). This significant increase in property recovery can be accredited to the quality of referrals received from officers within Housing Services and the fraud awareness program delivered by the CFT.

- 2.4 The CFT has continued its success of the previous year working closely with **Social Care** to highlight fraud and loss within the service area. In total **£211k of financial savings have been identified**, demonstrating an **increase of 62%** on the previous years (2020) outcomes. This is mainly due to the CFT increasing its coverage of fraud risks within Adult Social Care including Direct Payments and Financial Assessments.
- 2.5 In the area of **Revenues**, the team has delivered **9138 inspection visits** during 2021/22, which is a **52% increase** from 2020/21. With limited pandemic restrictions, the CFT has been able to operate fully in this area of work leading to the significant increase in inspections. Not only has the team increased its output, but its approach has been focused with maximising revenue at the forefront. A new initiative to increase revenue using open source and internal data sets in conjunction with investigative techniques commenced in 2021/22, which has led the CFT to achieving **£1.3m in loss prevention**. This new approach has underlined the importance of utilising data when highlighting fraud, loss and error.
- 2.6 Since April 2021 the CFT has been assisting colleagues from Exchequer Services (ES) by conducting verification checks for the different Covid-19 business grants offered by central government. A total of **1063** businesses were checked utilising tools such as **Spotlight** and **NFI bank account checker** to help confirm eligibility for the relevant scheme(s) and assist ES with their decision-making process.
- 2.7 The CFT has operated with a **Home Office Onsite Immigration Official (OSIO)** integrated within the Counter Fraud Team since 2018. Service provisions have been temporarily interrupted throughout the year due to sickness and a change in OSIO. Despite this, the work of the OSIO has continued to add value by identifying **£77k in loss prevention savings**. These savings have been identified predominately in the areas of Housing and Social Care, whereby applicants are no longer eligible for support due to their immigration status.
- 2.8 As part of the services commitment to partnership and engagement with stakeholders, the **CFT has delivered its largest Fraud Awareness Program to date** during 2021/22. The program reached a large audience internally and externally through **22 Fraud Awareness sessions**, social media posts, articles and our yearly Fraud Awareness Week campaign. The work in this area is key to creating and improving the counter fraud culture within the organisation.
- 2.9 The CFT has continued to carry out focussed proactive projects as part of its strategic approach to tackle fraud in the Councils highest risk areas. These areas are considered to be susceptible to fraud and financial loss. Per the table at **Appendix C** the CFT conducted **ten** proactive projects in 2021/22. The proactive drives provide assurance across the Council and highlights, where needed, any further preventative measures.
- 2.10 The CFT has been working closely with its colleagues from the **London Boroughs Fraud Investigations Group (LBFIG)** in setting the direction of travel for the **new London Counter Fraud Hub**. Most London Boroughs will onboard in 2022 with the hub set to identify fraud, loss and error across multiple fraud risks. Hillingdon have already onboarded to the new hub with data matching to commence in mid to late 2022/2023. This new initiative will give the CFT the ability to match bespoke data sets in line with current fraud trends, delivering outcomes in real-time in areas of high risk.
- 2.11 **Chart 1** (over the page) summarises the areas* in which the CFT has achieved loss prevention savings (cost reductions) in 2021/22 by each quarter. Unlike previous years, the majority of loss prevention savings have been achieved by the CFT within Exchequer Services due to the teams work in Revenues Maximisation which started in Q2. However, Chart 1 also illustrates the consistent level of financial achievements in the area of Housing. A full breakdown of all CFT loss prevention savings can be found at **Appendix A**.

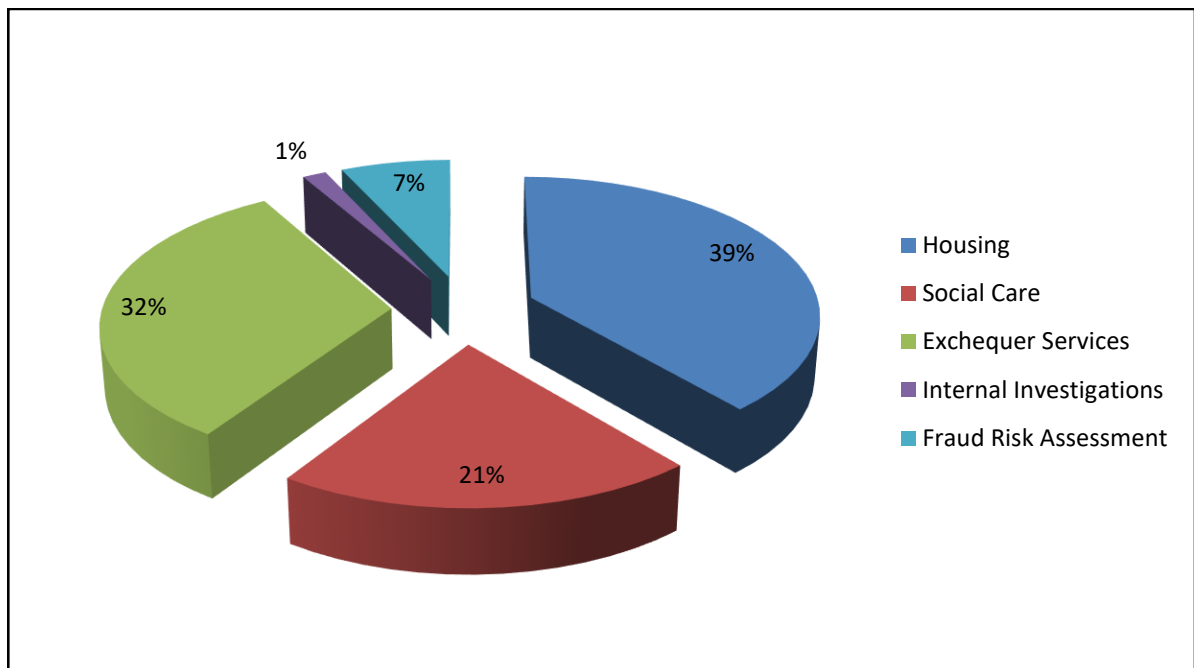
Chart 1 - CFT Loss Prevention Savings Achieved in 2021/22



*This includes savings generated through the work of the OSIO

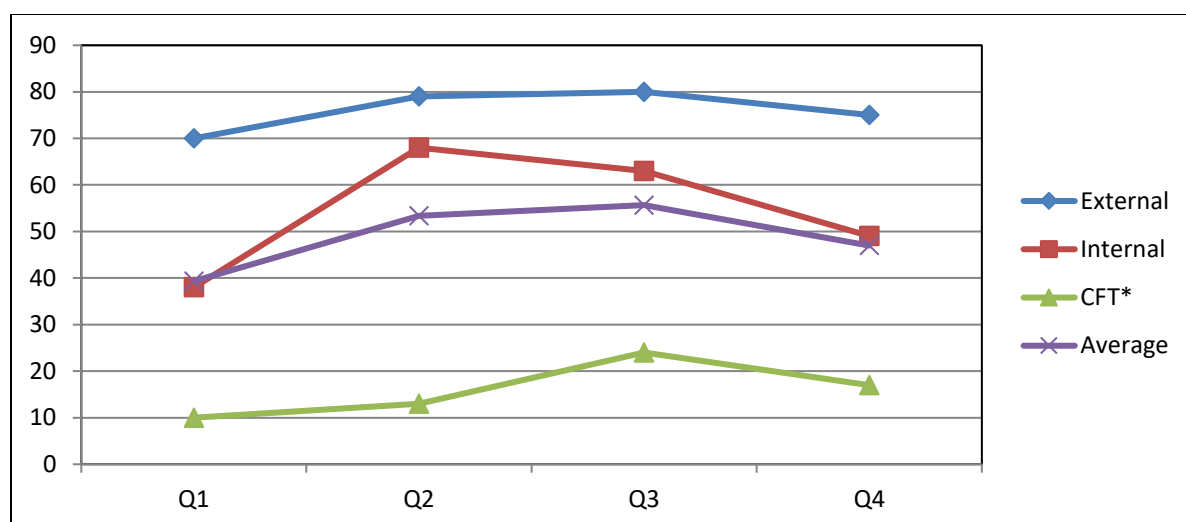
2.12 **Chart 2** below summarises the allocation of CFT resource in 2021/22. Similar to previous years, the team has spent the majority of its time working within the area of Housing. This is reflected by the increased number of properties recovered due to tenancy fraud. The chart also illustrates the increased fraud risk coverage within Social Care, particularly Financial Assessments and Direct Payments, with a **12% increase in resource allocation** compared to previous years.

Chart 2 - CFT Allocated Resource in 2021/22



2.13 In 2021/22 the CFT received a **total of 586 referrals for investigation** from both internal and external sources (compared to 515 in 2020/21). **Chart 3** (over the page) provides a summary of the trend in referrals over the year. In Q2 the CFT received a sharp increase in internal referrals, this can be attributed to the increase in fraud awareness presentations delivered to service areas within the Council.

2.14 The HCF notes that referrals in Q4 were in a slow decline. To combat this the CFT are preparing a largescale fraud awareness programme for 2022/23 which will be consistent throughout the financial year, with the anticipation of increased fraud referrals from a variety of services areas across the Council.

Chart 3 - Number of 2021/22 Referrals by Quarter

*Referrals generated through CFT proactive projects or data matching exercises

3. Analysis of Counter Fraud Activity in 2021/22

3.1 This section provides a more detailed analysis of the activities of the CFT during 2021/22, detailing specific work streams and the trends within each area for comparison and contrast. The activities of the CFT were predominantly focussed on three main fraud areas of work: **Housing, Social Care** and **Revenues**. The CFT also conducted proactive **Blue Badge** operations during the year as well as investigating allegations of Blue Badge misuse. The team were also commissioned to carry out several internal fraud control consultancy reviews in conjunction with Internal Audit.

3.2 Housing Fraud

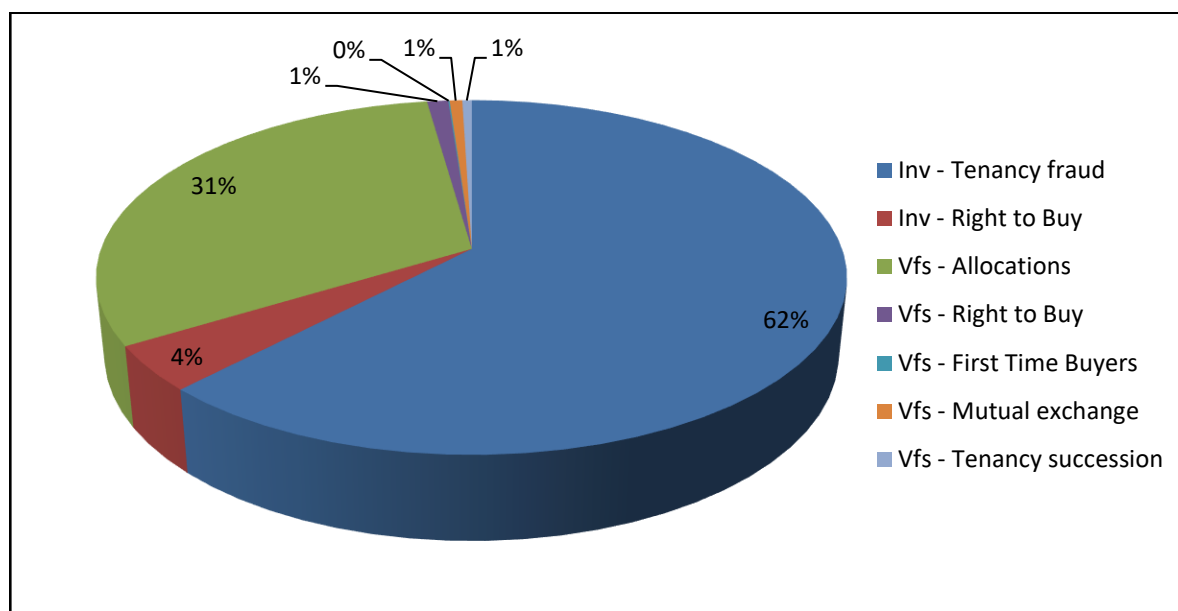
3.2.1 Throughout 2021/22 housing fraud and verifications has continued to be the key area of work for the CFT. By undertaking verification checks, the applicants' eligibility for housing services are properly verified prior to being offered a tenancy and provides assurance to key stakeholders that the risk of fraud in this area is being managed effectively. The CFT continues to proactively identify and investigate instances of tenancy fraud. This combined approach has enabled the team to deliver effective loss prevention savings.

3.2.2 The CFT successfully **prosecuted a tenant and her son after uncovering a 10-year tenancy fraud** involving the sub-letting of a 4-bedroom house. The work put into the case, along with involvement from other departments lead to both parties pleading guilty to offences. They were both fined, sentenced to complete 120 hours of unpaid work and in addition the son was given a 9-month suspended prison sentence.

3.2.3 The CFT undertook a range of proactive projects throughout the year within housing, as listed in **Appendix C**. These projects are planned as part of the Counter Fraud Annual Workplan and are intended to ensure that areas where housing fraud predominantly occurs are reviewed to highlight any fraudulent activity.

3.2.4 The Council's first ever **Key Amnesty Campaign** was conducted in Q3 and led to the successful return of much needed housing stock. The fraud awareness campaign that was organised around the project led to increased public awareness of tenancy fraud. The CFT utilised all the available media platforms with a targeted media campaign to highlight the negative impact of tenancy fraud. This concerted effort has directly correlated in an improvement in the quality of referrals received.

Chart 4 - CFT Work Within Housing Services in 2021/22



3.2.5 As per **Chart 4** above, most of the counter fraud activity that was conducted within housing is heavily focussed on tenancy fraud investigations and verifications for housing applicants. The CFT has undertaken numerous proactive projects for housing in 2021/22, which in turn generates investigations and case work.

3.2.6 The team also achieved positive outcomes in other areas of loss prevention work within housing, such as the **cancellation of 3 Right to Buys leading to loss prevention savings of £328k**. All 3 applications were closed due to various reasons including failure to disclose finances, non-occupation of a Council Property, and a false application. Right to Buys present a variety of fraud risks relating to potential money laundering and tenancy fraud.

3.2.7 Per **Table 1** below, in 2021/22 the CFT successfully recovered **42 Council properties**. This is a significant increase from the results in 2020/21. The combination of a concerted internal and external fraud awareness campaign, led to higher quality referrals being received. The easing of Covid restrictions also enabled CFT officers to re-introduce unannounced residency checks. These further highlighted instances of non-occupation and strengthened our sub-let investigations where sub-tenants were found to be occupying.

Table 1 ~ Housing Tenancy Fraud Cases

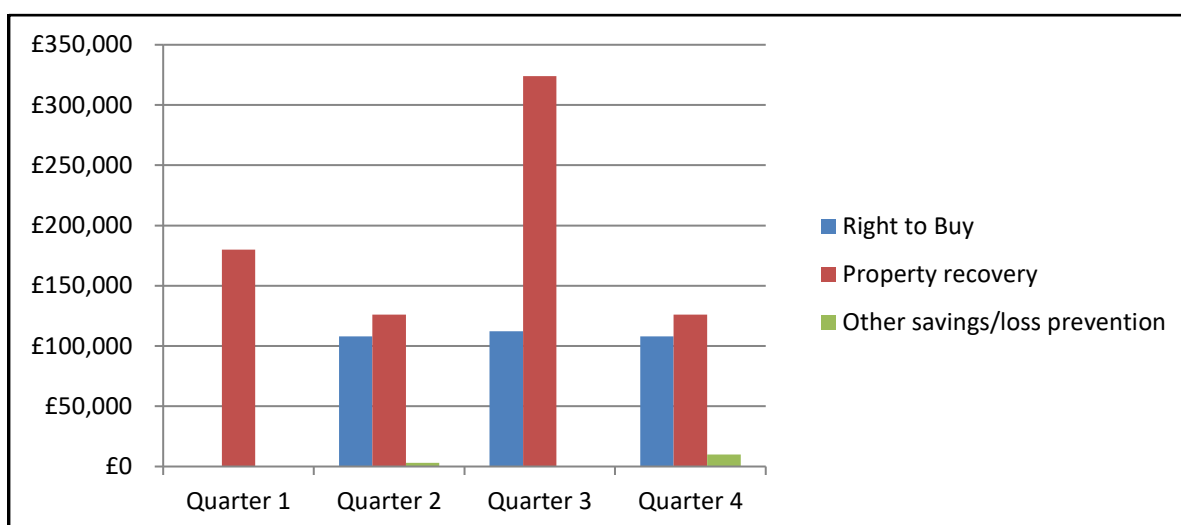
Housing Tenancy Fraud	2021/22		2020/21		2019/20	
	Cases	£k/value**	Cases	£k/value	Cases	£k/value
Total number of recovered properties	42	£756k	22	£396k	28	£504k

** = 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. In 2022/23 the CFT will be using the new Tenancy Fraud Forum valuation for property recovery.

3.2.8 **Chart 5** (over the page) summarises the loss prevention outcomes of the team by area of counter fraud activity within Housing. In Q3 the team reported its **highest property return figures on record for a single quarter**. This also coincided with the launch of the first ever **Key Amnesty Project** and the accompanying media campaign that utilised the different media platforms that were available. These positive results reflect the importance and value

of Fraud Awareness programmes and the regular media communications that have been utilised to raise awareness of housing fraud, both internally and externally.

Chart 5 - CFT Loss Prevention Outcomes in Housing 2021/22



3.2.9 In 2021/22 the CFT continued to carry out verifications as part of the housing allocations process. As per **Table 2** below, 2100 housing cases were allocated for verification checks to be conducted. These enhanced checks give assurance to management that housing applicants are genuine, entitled to be housed prior to allocation and highlight potential fraudulent applications for further investigation.

3.2.10 Of the **2100 housing verifications** carried out in 2021/22, the CFT identified **24% for rejection**, including the closure of **16 applications**. There are various reasons for a verification to be rejected or closed, and these include significant rent or Council Tax arrears, property ownership, no immigration status, or misrepresentation of circumstances. With a high demand for social housing assistance these checks continue to highlight their importance, as applicants may have been successful in obtaining a council property that they were not entitled to.

Table 2 ~ Housing Tenancy Verification Cases 2021/22

Housing Tenancy Verification Cases	Q1	Q2	Q3	Q4	Total
Total number of cases reviewed	756	511	492	341	2100
% Identified by CFT for rejection	29%	24%	25%	26%	24%
Total number of applications closed	1	3	6	6	16

3.3 Revenues

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

3.3.2 Per **Table 3** below, the CFT **achieved a marked improvement** in both output and successfully completed inspections within the defined KPI target. The CFT were also able to deliver significant loss prevention savings from the introduction of the Revenue Maximisation project.

Table 3 ~ Revenues Inspections Performance 2021/22

Revenues Inspections	2021/22	2020/21	Improvement
Total number of inspections completed	9,138	6,005	+ 3133 / + 52%
Percentage within 10 day target	97%	59%	+ 38%

3.3.3 The CFT continued to proactively identify Beds in Sheds within the borough and a **total of 23 unregistered dwellings** during the year have been added to the Council Tax list. These previously unlisted properties resulted in **loss prevention savings of c£49k**. The identification of Beds in Sheds will continue to be a priority for the CFT with further proactive projects planned for 2022/23.

3.4 Revenue Maximisation

3.4.1 The shift to focus on areas of loss prevention within NNDR has proven to be highly successful. As a result of the introduction of the Revenue Maximisation Project, a total of **c£1.3m of previously uncollected revenue** was identified. This area of work highlighted the benefits of utilising open source and in house data streams to identify previously unlisted and or amended businesses and properties and demonstrates the risk of financial loss within this area.

3.4.2 The initial success of this project has since led to a working partnership with external data providers which commenced in Q3. It is envisaged that several unregistered businesses will be identified by this approach. The CFT will continue to prioritise and develop this workstream into 22/23 with further positive outcomes expected to be achieved.

3.5 National Fraud Initiative

3.5.1 The Council's participation in the NFI project yields financial savings beyond that of the CFT, details of which are captured by the Cabinet Office and reported based on their assessment of the estimated impact of the NFI's work. The figure identified for the most recent ongoing exercise are **savings of c£49k**. These are confirmed savings that have been achieved from the Council Tax Single Persons Discount annual exercise.

3.5.2 An NFI data match resulted in the **recovery of 1 property** by utilising internal data sets that were matched against information held by the Department of Work & Pensions (DWP). This match identified a family sized property where the tenant was recently deceased, whilst the tenancy remained active.

3.5.3 Per **Table 4** (over the page), the results for the **NFI loss prevention work by the CFT in 2021/22 were total savings of £59,949.28**. This is a positive return for the year and provides assurance to the organisation that failing to disclose a change in circumstances and or ineligible claims for discounts will be reviewed and amended.

3.5.4 The bi-annual NFI exercise is expected to be released during Q3/Q4 of 2022/23. With the introduction of the newly formed Data Analytics Unit, we are expected to see an increase in NFI outcomes for 2022/23.

Table 4 ~ NFI Savings in 2021/22

Area of Saving	Q1	Q2	Q3	Q4	Total
Single Person Discount	£1,130.07	£30,388.18	£14,037.38	£1,326.64	£46,882.27
Council Tax Exemption	-	-	-	-	-
Council Tax Reduction	-	-	£667.16	£134.82	£801.98
Housing Benefit	-	£,1638.14	£627.53	-	£2,265.67
Housing Tenancy	-	-	-	£9,999.36	£9,999.36
Totals	£1,130.07	£32,026.32	£15,332.07	£11,460.82	£59,949.28

3.5.5 The CFT has joined several other London councils in agreeing to join the NFI backed **London Counter Fraud Hub (LCFH)**. This project is very much in its infancy and a working group has been set up to create an agreed framework to move the project forward. It is envisaged that the LCFH will proactively help to identify instances of cross borough fraud and loss. Most London based councils are expected to complete their on-boarding process by the end of 2022. The NFI team are also in the process of updating their website to include enhanced functionality and introduce new tools to aid investigations. These are welcomed improvements that will add much needed data analytic elements to their service.

3.5.6 The CFT works closely with its counterparts in the DWP, forming a collaborative approach to benefit investigations whereby Council Tax Reduction (CTR) is in payment. Due to the lingering impact of the pandemic the DWP investigators are slowly transitioning back to normal investigative duties. Communication from the DWP suggests that joint working should resume in Q2 of 2022/23.

3.6 Grant Verification

3.6.1 The CFT continued to work closely with colleagues from Exchequer Services to assist with the verification of local businesses in relation to the **new grant schemes introduced by central government**. Several grant schemes were made available to support local businesses during the lockdowns that came into force during the year. Assurance verification processes were reviewed and re-implemented to mitigate the risk of fraudulent applications and to ensure funding was used for its intended purpose.

3.6.2 A number of new grants were introduced that included one off payments and or incremental payments over a set period of time. The CFT were involved in **1063 verification checks** for the different grants. These checks included utilising Cabinet Office software, such as Spotlight and NFI bank account verification tools. Inspection visits were also conducted to verify proof of trading. This provided assurance to ensure that only genuine businesses were accessing much needed funds during this difficult period. As a result of these checks there are **2 businesses that are under formal investigation** for potential fraudulent grant applications.

3.7 New Homes Bonus

3.7.1 During Q2 the CFT undertook a project to identify properties that had been classified as long-term empty but were found to be occupied. 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.

3.7.2 Following the conclusion of the project, the work conducted by the CFT led to a **£380k increase** to the provisional £2,765k figure that was provided by the Local Government Council for the Consultation Budget relating to the New Homes Bonus Scheme. This area of work directly impacted the amount of grant money that would be allocated to the Council.

3.8 Small Business Rates Relief

3.8.1 A total of **409** checks were conducted that involved unannounced visits along with interrogation of internal systems. As a result of these SBRR checks **27** premises required a change of occupier, **38** premises were identified as unoccupied and will require further monitoring. Every identified eligible business result in additional central government funding being received by the Council.

3.9 Blue Badge Fraud

3.9.1 In 2021/22 the team carried out 3 proactive operations targeting identified hotspot areas for parking offences. The first two operations were coordinated within the parking schemes at Ruislip Lido and the surrounding residential area. Following concerns over visitors to the area misusing Blue Badges were raised by residents to their Councillors. The operations took place during peak times and included a weekend to account for increased likelihood of misuse. A total of **50 badges** were checked which resulted in **6 Simple Cautions** being administered. A further 4 expired badges were also seized, and a fixed penalty notice issued.

3.9.2 The third proactive operation was intelligence driven. Officers focussed their efforts on Hayes Town Centre and around Botwell Leisure Centre to ensure that parking for blue badge holders was readily available during the busy festive period. During this successful operation a total of **24 badges were checked**, resulting in **5 simple cautions** being administered.

3.9.3 The Council is committed to preventing and detecting Blue Badge fraud through the work of the CFT. 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. The CFT will continue its proactive work within this area in 2022/23 and will be reporting outcomes to the residents via our different media platforms.

3.10 Social Care

3.10.1 Throughout 2021/22 the CFT continued to engage with Social Care regarding fraud risks across the service. This has led to the introduction of new initiatives across Financial Assessments (FA) and Direct Payments. This increase in counter fraud activity means that the **CFT is now embedded across all the main fraud risks within Social Care**.

3.10.2 During 2021/22 the CFT introduced a **new verification initiative for all FA applications**. This process was designed to highlight any irregularities such as hidden assets or capital which would lead to a financial burden on the Council. In total the team **received 410 verification requests** with 11 requiring additional checks and 1 currently under investigation.

3.10.3 The CFT also investigates FA cases where an applicant has failed to declare or misrepresented their assets or income. **In 2021/22 investigations into 2 cases has led to loss prevention savings of c£45k**. In this area of work 1 case is still under investigation. The HCF expects further outcomes in this area of work during 2022/23.

3.10.4 The CFT undertook verification checks for all applicants who approached Social Services for Section 17 accommodation and financial assistance. This gives key stakeholders assurance that those in need of this vital funding are genuine and eligible. As Per **Table 5** (over the page), the team reviewed 21 cases of which **5 cases were closed**, resulting in **loss prevention savings of £70,684**.

Table 5 ~ Section 17 Verification Cases 2021/22

Section 17 Cases	Q1	Q2	Q3	Q4	2021/22
Total number of cases reviewed	6	7	7	6	26
Total number verified as accurate	4	6	6	3	19
Total number of cases undergoing further checks	0	0	0	2	2
Total number of cases closed	2	1	1	1	5
Loss Prevention Savings	£26,256	£13,128	£13,128	£18,172	£70,684

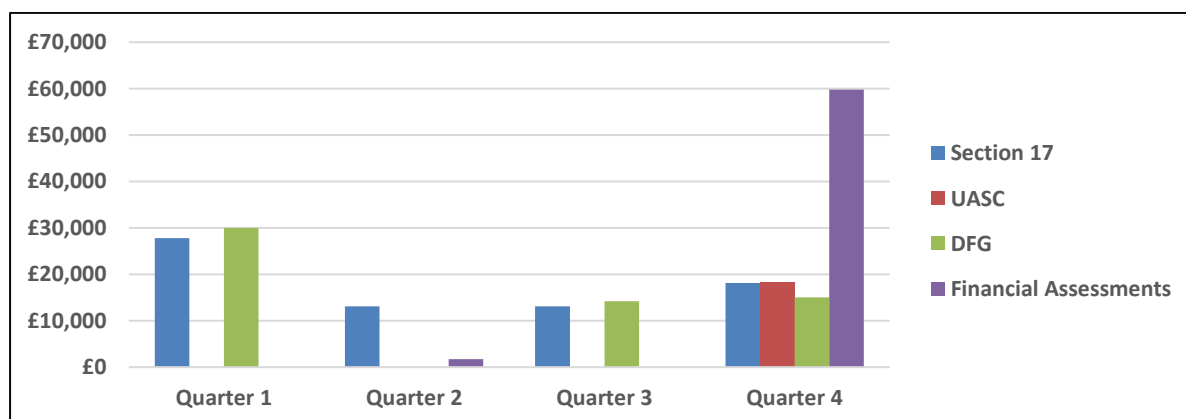
3.10.5 This financial year the CFT has engaged with the Corporate Collections Team (CCT) to support debt recovery within Social Care. The team’s investigative and intelligence gathering skills set can aid in the collection of funds owed by individuals for their care. In total **35 tracing enquiries** have been passed to the CFT to identify the whereabouts of the debtor(s) or to identify assets and/or capital for those that refuse to pay. **In this area of work the CFT has provided evidence to support the repayment of c£14k in debt owed.**

3.10.6 A proactive project in Q3 took place involving **residency checks to all Unaccompanied Asylum-Seeking Children (UASC)** residing in shared accommodation supported by the Council. The purpose of this project was to verify that the shared accommodation was utilised in the correct manner and to identify concerns of sub-letting or non-occupation. The team **identified 2 cases** of non-occupation, **resulting in savings of £18,207.30** with 2 further cases under investigation.

3.10.7 The CFT throughout 2021/22 has continued to investigate cases in relation to **Disabled Facilities Grant (DFG)**. The DFG scheme has strict eligibility criteria and is means tested to determine an applicant’s contribution. In total the team **cancelled 4 DFG applications**, these cases involved instances where applicants were ineligible for funding due to non-occupation of the property, or they had failed to declare finances and assets which in turn would make them ineligible for the grant. **The financial savings in this area of work totalled £59,209**, with 3 further cases under investigation.

3.10.8 As per **Chart 6** summarises the loss prevention outcomes of the team for the work carried out within Social Care. Over the course of 2021/22 the CFT have continued to raise their profile within these services and engage positively with stakeholders, which has **delivered loss prevention savings of £211,141**, with most of these savings delivered in Q4.

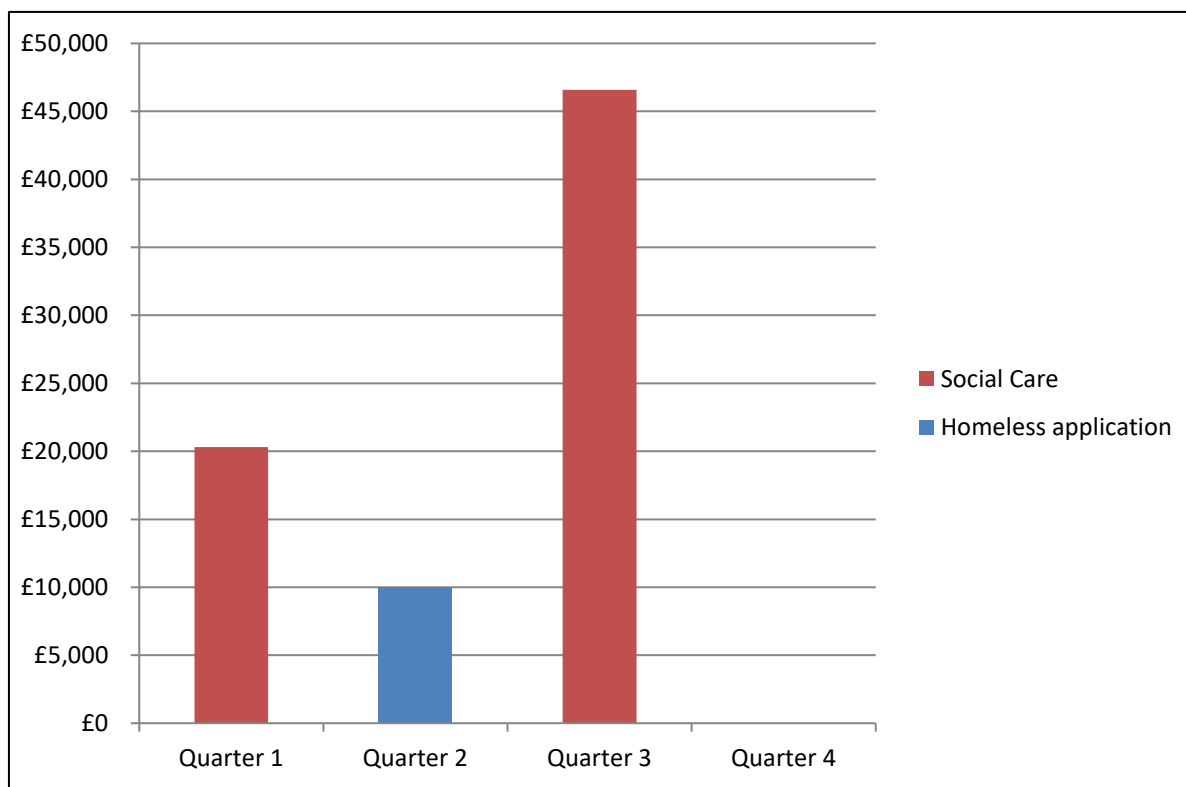
Chart 6 - CFT Loss Prevention Outcomes in Social Care 2021/22



3.11 Onsite Immigration Officer (OSIO)

3.11.1 **Chart 7** below, summarises the outcomes for the work of the OSIO within 2021/22. This is based on prudent estimates of the costs of Council services that are linked to immigration issues where the OSIO has been able to directly assist with by providing Home Office information. The total value of the OSIO work for 2021/22 is prudently estimated at **£76,894.00**.

Chart 7 - OSIO Loss Prevention Outcomes 2021/22



3.11.2 The OSIO outputs have been hindered by a combination of staff continuing to work remotely during the early part of the year and a prolonged period of sickness for the OSIO. The service was completely unavailable during the vast majority of Q4 due to the OSIO being on long term sick leave. The HCF with the team will prioritise improving outcomes in this area of work throughout 2022/23.

3.12 Fraud Awareness Campaign

3.12.1 The CFT continued to **embed an effective counter fraud culture** within the Council. A total of **22 Fraud Awareness sessions** were conducted both in person and virtually over the course of the year. Each presentation was tailored to incorporate the different fraud risks encountered by each service area. To coincide with **International Fraud Awareness Week** in November, a Fraud Awareness stand was manned by members of the team in the Pavilion's Shopping Centre. Officers were able to interact with residents and members of the public to raise awareness about fraud and to share fraud prevention advice.

3.12.2 The Council's various social media platforms have been utilised by the CFT to raise awareness of the different types of fraud scams that had become prevalent over the course of the pandemic. Tweets and online posts were shared to encourage residents to report suspected instances of fraud. A hashtag handle **#fraudawarenessfriday** was created to accompany the regular postings that were made on behalf of CFT by the Comms Team. Examples of the CFT's media campaign can be found in **Appendix F**. There has been a notable correlation between the quality and quantity of referrals following on from the Fraud Awareness campaign.

4. Analysis of the Counter Fraud Team Performance 2021/22

- 4.1 The CFT introduced a suite of KPIs in 2018/19 which were agreed and implemented in liaison with CMT and the Audit Committee. The KPI's allow effective measurement of performance and enable the team and the HCF to be better held to account by CMT and Audit Committee. The table at **Appendix B** sets out the performance by the CFT against the KPIs throughout 2021/22 by quarter and previous years.
- 4.2 As illustrated in **Appendix B**, performance against KPIs have significantly improved across **6 of the 9 KPIs**. The team has also **achieved 8 of the 9 KPI targets**. Moving forward the team will focus on sustaining this level of performance into the new financial year.
- 4.3 As per the new Counter Fraud Strategy 2022-25, the teams KPI's have been reviewed and updated to reflect the CFT's work across the organisation. In some areas the KPI targets have been increased to challenge CFT's performance. These new KPI's will be implemented in 2022/23.
- 4.4 The table at **Appendix A** provides a detailed breakdown of the loss prevention performance of the Counter Fraud Team during 2021/22. The table highlights the **significant increase in Revenue's outcomes** since the introduction of the revenue's maximisation project.
- 4.5 During 2021/22 the CFT has actively sought to obtain data from each London Borough relating to counter fraud activity and produced benchmarking information which is set out at **Appendix D**. This data relates to reported figures in counter fraud annual reports to oversight committees for 2020/21. There is a significant inconsistency between authorities in terms of what they each report to their oversight committees and the variation in values they each place on individual activities. As a result, this makes comparison between authorities in terms of individual counter fraud work areas difficult to quantify.
- 4.6 Nevertheless, there are several areas of general commonality (as set out in **Appendix D**), including the performance on housing fraud and Blue Badge which are present across most London Boroughs.

5. Forward Look 2022/23

- 5.1 Looking ahead to 2022/23, the CFT as part of the Council's Counter Fraud Strategy 2022-25 will continue to develop its risk based approach, focussing on the areas of highest fraud risk within services. Key to this is the continued engagement with service areas on fraud risk and controls to support and underpin the Council's "Fraud Universe" which steers the CFT Annual Operational Work Plan.
- 5.2 Moving ahead, there are a number of key priorities for the CFT. These include:
- Currently there are three vacancies within the team following a mini restructure, which has created operational capacity, **recruitment** to these roles is a priority. The HCF expects that the CFT will be fully resourced by the middle of Q2 2022/23;
 - **Implementation of the Counter Fraud Annual Operational Work Plan 2022/23**, with a full and ongoing reassessment of the fraud risk profile of the Council to ensure the CFT adapts to any emerging risks;
 - To continue to embed a counter fraud culture across the Council through a successful **programme of Fraud Awareness**, alongside engagement with key stakeholders regarding fraud issues internally and externally;

- A continued focus on identifying businesses that are not listed for ratings through our **Revenues Maximisation Project**, to increase the NNDR collectable by the Council, using open source data and intelligence gathering;
- Develop our input into the **London Counter Fraud Hub**, using data from service areas to highlight fraud, loss or error;
- **Sustain the level of performance the team achieved in 2021/22 into 2022/23**, by focusing on our strategic objectives, KPI's and the financial loss prevention target by deploying a risk based approach to fraud;
- Continue to work closely with **Social Care key stakeholders around the risk of fraud in particular the Adult Social Care charging reform**, with the view to conduct further proactive and reactive counter fraud activity in this area; and
- Embrace and participate in a cohesive **new finance directorate** with Internal Audit, Counter Fraud and Finance working collaboratively towards common objectives.

5.4 The CFT would like to take this opportunity to formally record its thanks for the co-operation and support it has received from the management and staff of the Council, CMT and the Audit Committee during 2021/22.

Alex Brown APCIP
Head of Counter Fraud
24th June 2022

CFT Loss Prevention Performance 2021/22

Work Area	Description	Q1	Q2	Q3	Q4	2021/22
Housing	Right to Buy discount	£0	£108,000	£112,300	£108,000	£328,300
	Property Recovery (notional savings)	£180,000	£126,000	£306,000	£144,000	£756,000
	Other savings/loss prevention	£0	£4,122	£0	£9,999	£14,122
Social Care	Section 17 and UASC*	£27,775	£13,128	£13,128	£18,172	£72,203
	Financial Assessments and Direct Payments	£0	£1,754	£0	£59,767	£61,521
	Disabled Facilities Grant	£30,000	£0	£14,209	£15,000	£59,209
Revenues	Single Person Discount	£3,247	£37,172	£18,629	£6,057	£65,105
	Council Tax Reduction	£4,930	£4,081	£4,623	£5,542	£19,176
	Beds in Sheds	£12,367	£13,202	£12,224	£11,517	£49,310
	Housing Benefit Overpayments	£23,312	£41,419	£74,718	£20,443	£159,892
	NNDR**	£5,866	£1,165,672	£37,003	£154,196	£1,362,737
Blue Badge	Simple Caution & Financial Penalty	£500	£100	£200	£300	£1,100
Immigration Officer	Housing Homelessness Applications	£0	£9,999	£0	£0	£9,999
	Social Care Savings	£20,303	£0	£46,592	£0	£66,895
Totals	Loss Prevention Savings	£78,078	£132,882	£186,229	£229,145	£626,334
	Notional Savings	£208,299	£1,158,240	£412,171	£295,510	£2,074,220
	Cashable Savings	£21,423	£232,428	£41,026	£51,623	£346,500
	Costs awarded and penalties	£500	£1,100	£200	£300	£2,100
	Total	£308,299	£1,524,650	£639,626	£576,578	£3,049,154

* 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.

KPIs and Actual Performance 2021/22

CFT KPIs	Target	Q1	Q2	Q3	Q4	21/22	20/21
1. Percentage of fraud referrals risk assessed within 3 working days	95%	100%	100%	99%	99%	99%	87%
2. Verification work timescales for completion:							
a. Housing Allocations completion within the target date set by Housing	95%	99%	99%	99%	99%	99%	95%
b. First Time Buyer completion within 5 working days	95%	100%	N/A*	N/A*	N/A*	100%	33%
c. Right to Buy completion within 28 working days	95%	100%	100%	100%	100%	100%	100%
3. Investigation plan completion within 5 working days of case allocation	95%	100%	95%	98%	100%	99%	90%
4. Tenancy fraud referrals received resulting in property recovery	20%	39%	23%	38%	29%	33%	41%
5. Investigations resulting in sanction (prosecution/penalty/caution)	10%	12%	4%	2%	2%	5%	5%
6. Investigations resulting in loss prevention/financial saving outcome	25%	44%	51%	64%	56%	55%	39%
7. Revenue inspections completed within 10 days of raising	95%	94%	97%	98%	99%	97%	59%

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

Proactive Counter Fraud Projects 2021/22

Proactive Project & Rationale	Project Outcomes
<p><u>Temporary Accommodation Residency - Q1</u></p> <p>The CFT carried out unannounced residency checks on all service users residing in Temporary Accommodation properties.</p> <p>The purpose of the project was to identify any sub-letting of accommodation, instances of non-occupation, as well as verifying those that had applied for social housing and ensuring that they were still eligible.</p>	<ul style="list-style-type: none"> • Number of properties visited - 192 • Number of properties verified - 184 • Properties Recovered - 2 • Investigations continuing - 6 • Financial Savings - £36k
<p><u>Section 17 Residency - Q1</u></p> <p>The CFT carried out a project conducting residency checks for all Section 17 Social Care service users. The objective of this project was to verify that the accommodation provided was being lawfully occupied and identify any fraud being committed through subletting, non-occupation, or not meeting the eligibility criteria for funding and assistance.</p>	<ul style="list-style-type: none"> • Number of cases reviewed - 26 • Number of cases validated - 25 • Cases recommended to cease funding - 1 • Loss prevention through terminating funding - £13,128
<p><u>Empty Properties New Homes Bonus - Q2</u></p> <p>The New Homes Bonus (NHB) is a grant paid by central government to local councils to incentivise housing growth in local areas. The CFT worked alongside colleagues within Exchequer Services, to identify properties that were recorded as empty but were in occupation, counting towards the NHB.</p> <p>CFT completed desk-top enquiries and information gathering along with unannounced visits to properties where checks indicated that a visit was required.</p>	<p>As a result of this work, the Council's provisional NHB grant figure has been calculated at £2,765k. This is a £380k increase in the original figure that included in the Consultation budget presented to Cabinet in December 2021.</p> <p>The NHB is calculated on a NET figure of the total number of properties that are brought into occupation against the number that become long term empty in the same period.</p>
<p><u>Beds in Sheds - Q2 and ongoing</u></p> <p>'Beds in Sheds' is the term used to describe buildings or annexes on private properties that have been erected without the Valuation Office being made aware and that can be considered habitable. This means that the building or annexe should be charged Council Tax.</p> <p>The CFT carried out unannounced visits to properties that were highlighted via referrals and intelligence checks. This will remain an ongoing project throughout 2022/23.</p>	<ul style="list-style-type: none"> • Number identified for bringing into Council Tax - 23 • Investigations continuing - 5 • Income generation - £49,309

<p><u>Outstanding Gas Safety Inspections - Q2</u></p> <p>Working collaboratively with internal departments, the CFT conducted unannounced visits to all social housing properties that were overdue a gas safety check of 12 months or longer.</p> <p>The purpose of this project was to reduce the number of properties that were overdue a gas safety inspection, whilst also identifying potential cases of non-occupation or subletting.</p>	<ul style="list-style-type: none"> • Number of properties visited - 36 • Number of gas inspections completed - 31 • Properties Recovered - 2 • Financial Savings - £36k • Legal costs savings - £12k • Investigations continuing - 3
<p><u>Unaccompanied Asylum-Seeking Children - Q3</u></p> <p>The CFT carried out a visiting programme in which residency checks were conducted on all accommodation units occupied by Unaccompanied Asylum-Seeking Children.</p> <p>The purpose of the visits was to ensure that service users were in occupation, and still eligible for their placements. Reviews of their circumstances also highlighted potential savings, including assistance with claiming public funds.</p>	<ul style="list-style-type: none"> • Number of properties visited - 98 • Number of properties verified - 90 • Investigations continuing - 6 • Closed Accommodation - 2 • Financial Savings - £18,207.30
<p><u>Small Business Rates Relief - Q3</u></p> <p>The Small Business Rates Relief (SBRR) scheme is designed to reduce the amount of business rates payable by small businesses. This reduction is available to ratepayers who occupy a property with a rateable value of no more than £15k.</p> <p>This is an important area of work as it helps to support small local businesses and the Council receives guaranteed income from central government for every eligible business identified.</p>	<ul style="list-style-type: none"> • 409 businesses checked • 27 businesses required a change of occupier • 38 premises identified as unoccupied
<p><u>Blue Badge - Q2 & Q3</u></p> <p>The CFT conducted two proactive blue badge operations within the parking management schemes at Ruislip Lido and surroundings, along with a third operation in Hayes Town during the peak shopping Christmas period.</p> <p>Checks were carried out on all badges that were displayed, to ensure that the eligible holder was present. The operations included seizing expired badges, which removes them out of circulation from potential misuse in the future.</p>	<ul style="list-style-type: none"> • Number of badges checked - 74 • Number of badges seized - 12 • Number of fraudulent uses of badges - 11
<p><u>Key Amnesty Campaign - Q3</u></p> <p>The first ever Key Amnesty campaign was launched, which was designed to highlight to residents that social housing fraud is a crime and that the Council will investigate and take action.</p> <p>The campaign gave an opportunity for anyone who was mis-using their council property, to surrender their tenancy, without any legal action being taken against them.</p>	<ul style="list-style-type: none"> • Number of properties returned - 3 • Notional Savings - £54k

<p><u>National Fraud Initiative (NFI) - Ongoing</u></p> <p>The National Fraud Initiative (NFI) Recheck is an annual data match where SPD data is matched against the Electoral Roll.</p> <p>The CFT continues to work on these matches which has highlighted various savings and loss prevention across areas such as Housing and Exchequer Services.</p>	<ul style="list-style-type: none">• Number of properties returned - 1• Financial Savings - £59,948
<p><u>B&B Emergency Accommodation - Q4</u></p> <p>The CFT carried out a project conducting unannounced residency checks for all clients residing in Bed and Breakfast emergency accommodation.</p> <p>The objective of this project was to verify that the accommodation provided was being occupied and to also identify cases of subletting, non-occupation, or misrepresentation of circumstances.</p>	<ul style="list-style-type: none">• Number of clients visited - 180• Number of clients verified - 163• Accommodation Recovered - 1• Investigations continuing - 16

Counter Fraud Benchmarking 2020/21

London Borough	Council Properties Returned	RTB Cancelled	Housing Applications Closed	Council Tax & CTRS	Blue Badge Outcomes*	Social Care
Barking & Dagenham						
Barnet	3	2	1		1	
Bexley	4		57		13	
Brent		1		£251,765		
Bromley					57	
Camden	49					
City of London	2		5	£1,280		
Croydon	5	2	7			
Ealing	5		8	£115,394		£54,973
Enfield	40	8	15	£54,249	4	£268,000
Greenwich	6				1	£16,179
Hackney	11	1			5	
Hammersmith & Fulham	6	1				
Haringey	21	69				
Harrow	2	5		£6,828		
Havering	2	4				
Hillingdon	22	2	14	£69,876	3	£131,000
Hounslow	4	40		£29,156		£7,144
Islington						
Kensington & Chelsea	11	7	9		19	
Kingston	7	13	27	£44,737	1	
Lambeth	65	5		£18,869	74	£240,000
Lewisham	1	1	2			
Merton	3		1			
Newham	10	6	16			
Redbridge						
Richmond	16	2	6	£281		
Southwark						
Sutton	10		1			
Tower Hamlets	22	4				
Waltham Forest	14	8		£37,514		
Wandsworth	27	16	2		34	
Westminster (City of)	12	24	9		15	

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

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

Glossary of Terms

Beds in Sheds

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

Blue Badge

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

Direct Payments

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

Disabled Facility Grant

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

Financial Assessments

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

Fraud Hub (LCFH)

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

National Fraud Initiative

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

New Homes Bonus

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

Onsite Immigration Enforcement Official

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

Right to Buy

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

Revenues Maximisation

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

Section 17

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

Small business Rates Relief

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

Unaccompanied Asylum-Seeking Children

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

Social Media Campaigns



Published on Twitter 7th May 2021

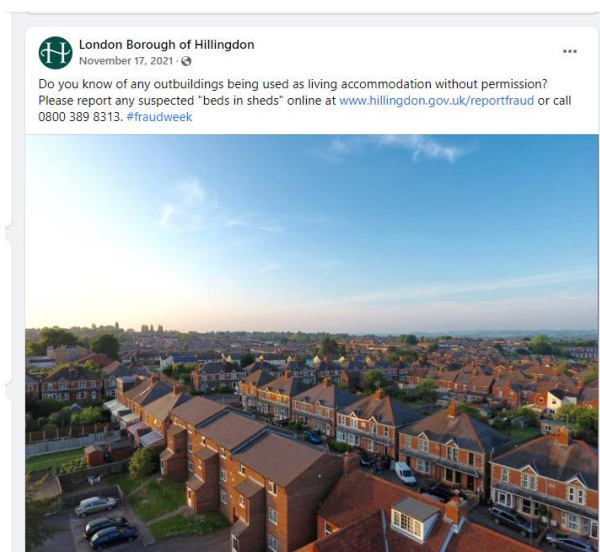


Published on Twitter 16th November 2021

Stamping out Blue Badge fraud

This summer, an operation was carried out by the council at Ruislip Lido to check that disabled Blue Badge permits were being used legally. Between Monday 26 July and Sunday 22 August, 50 badges were inspected by officers from the council's business assurance counter fraud team. Eight badges were seized for improper use, including four expired badges. Following the operation, officers from the council's parking services and business assurance counter fraud teams launched investigations into three cases of suspected misuse. One investigation has already concluded, and an offender has been issued with a fine and caution for misusing their Blue Badge.

Cllr Martin Goddard, Cabinet Member for Finance, said: "Blue Badges are there to help people who are disabled and in genuine need. While the majority of residents use their badge correctly, unfortunately a small minority abuse the system. "Thanks to the recent work carried out by our teams, we're catching up with those we've found breaking the law. If you suspect someone is misusing a Blue Badge, please report it." Blue Badges provide parking concessions for people with disabilities, allowing them to park closer to their destination. To find out more and check the eligibility criteria, visit www.hillingdon.gov.uk/blue-badges. Report suspected Blue Badge fraud at www.hillingdon.gov.uk/reportfraud, call 0800 389 8313 (Monday to Friday 9am to 5pm) or email fraud@hillingdon.gov.uk. Successful prosecutions result in a criminal conviction and a fine of up to £1,000.



Published on FaceBook 17th November 2021

Tenancy fraudsters face justice after 10-year deception

A three-year council investigation has resulted in a mother and son from Hayes being prosecuted for tenancy fraud. For 10 years, Doreen Bailey, aged 68, and her son Neil Mockford, aged 38, failed to inform the council that Doreen no longer lived at her council property at Hobart Lane, Hayes. Both pleaded guilty to fraud by failure to disclose information and making false representations to continue the tenancy. At Isleworth Crown Court on Tuesday 14 September, Bailey and Mockford were each sentenced to 120 hours unpaid work and a £500

penalty. Mockford was also given a nine-month suspended prison sentence. The property was recovered by the council in 2019. The case came to light following an anonymous tip-off, which started the investigation. Officers from the council's counter fraud team discovered that between 2008 and 2018, Doreen Bailey (previously known as Mockford) claimed to be living at the four-bedroom property despite moving to a different address in Hayes after remarrying in 2008. In February 2012, she falsely signed her tenancy verification form in her former surname, declaring

she was still occupying the Hobart Lane property. Her son – who was living in the property – continued the deception by falsely completing electoral records (on eight occasions) declaring his mother was staying at the council property. He was also caught lying to enforcement officers who visited the property in June 2018. He claimed that she was on holiday at the time of the visit but was unable to explain when she would return. Their fraudulent activity meant the council was potentially out of pocket by £161,000 – the equivalent cost to house a family in

need in emergency accommodation over a 10-year period. **Cllr Martin Goddard, Cabinet Member for Finance**, said: "For more than a decade, Bailey and Mockford cheated the housing system and thought they could get away with it. However, thanks to the work of our counter fraud team, their blatant dishonesty and attempts to cover up their fraudulent scheme caught up with them. "I hope this case serves a reminder to those who think they are above the law. We won't hesitate to take the same action against anyone else caught making fraudulent claims."

Published in Nov/Dec 2021 issue of Hillingdon People