

**Counter Fraud Progress
Report to Audit Committee:
2022/23 Quarter 1**

30th June 2022



HILLINGDON
LONDON

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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, 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 1 (Q1) period (1st April to 30th June 2022). 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 Q1.
- 1.2.2 The progress 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 Strategy 2022 to 2025), which provides an opportunity for the HCF to be held to account in this respect.

2. Executive Summary

- 2.1 The new financial year has started on a positive note for the CFT, with Q1 proving to be the **most successful quarter to date. A total of c£2.3m of financial savings** have been identified within the different workstreams. In particular the successes in Housing and Revenues have led to the identification of these significant savings. These outcomes should be considered against a financial savings target for 2022/23 of £3.5m.
- 2.2 As in 2021/22, tenancy fraud has remained a high risk area in Q1, with the CFT currently investigating a significant number of cases (114). The risk in this area has increased post Covid and the CFT has seen a sustained high level of positive outcomes and investigations in tenancy fraud for 3 consecutive quarters. **In Q1 the team has successfully recovery 15 properties** due to non occupation or sub letting. This work is vital to the Council, bringing housing stock back into use for those in genuine need.
- 2.3 The Revenue Maximisation project has now been embedded into counter fraud activity since Q3 of 2021/22. The project uses internally held and externally available open-source data to discover previously unlisted businesses. This work is conducted in house by the CFT and collaboratively with 2 external suppliers. **In total c£1.3m of uncollected revenue has been identified.** The HCF notes that there have been some exceptional items found in this area of work, leading to significant one-off savings. Although this is positive, it is unlikely that the CFT will continue to find savings of this level, as the project goes on. However, the CFT will look to sustain performance outcomes in this area.
- 2.4 The Onsite Immigration Officer (OSIO) from the Home Office has now returned from long term sick. The OSIO has cleared the backlog of outstanding immigration status checks and is proactively working with services to identify those that may no longer be entitled for assistance from the Council. **This work has led to loss prevention savings of c£42k in the area of Social Care.** The HCF expects further positive outcomes in this area throughout the financial year.

- 2.5 In Q4 of 2021/22 the CFT **embarked on implementing a new approved resourcing structure**. This new structure has been designed to increase officer capacity to ensure the CFT meets all its strategic objectives in 2022/23 including its loss prevention financial target. **The two new Counter Fraud Officer roles created within the structure have been recruited to** with both successful candidates now in post. Unfortunately, during Q1 three members of staff have handed in their notices including 2 Counter Fraud Analysts and 1 Counter Fraud Manager. The HCF and the management team are actively working on the recruitment process to fill these positions.

3. Analysis of Counter Fraud Activity in Quarter 1

3.1 Housing Fraud

- 3.1.1 Tenancy fraud has formed a large part of the team’s counter fraud activity during Q1, with the CFT undertaking proactive projects and investigations into subletting and non-occupation. As per **Table 1** (below), the continued work of the CFT has led to the recovery of **15 Council properties**, whilst also identifying **c£22k** in loss prevention savings.
- 3.1.2 Currently the CFT have **114 ongoing investigations** of suspected housing fraud. These cases consist of non-occupation, sub-let, wrongful succession and abandonment. Of the **114** ongoing investigations, **9** have been referred to our in-house legal team to commence legal proceedings, and **3** cases have resulted in possession being granted following successful applications to court.

Table 1 ~ Housing Tenancy Fraud Cases

Housing Tenancy Fraud Cases	2022/23*		2021/22	
	Cases*	£k/value**	Cases	£k/value
Total number of properties recovered	15	£840k	42	£756k
Total number of ongoing cases	114	£6,384k		

* As at end of Q1 (30th June 2022).

** As of the 2022/23 financial year, the CFT will be using the new Tenancy Fraud Forum valuation for property recovery. Working in conjunction with the London Boroughs’ Fraud Investigators’ Group (LBFIG) a new formula has been created to determine how much tenancy fraud costs. The formula considers the annual average temporary accommodation cost per family, the average duration for tenancy fraud, as well as the average investigation, legal and void costs. The agreed calculation for tenancy fraud within the borough is now valued at **£56k** per property (**Previously £18k**). The new calculation allows Hillingdon Council to accurately calculate financial savings by factoring in local figures.

- 3.1.3 The Key Performance Indicator (KPI) 4 (refer to **Table 6** in **Appendix A**) targets an outcome of a Council property to be recovered for 30% of tenancy fraud referrals received. Q1 has demonstrated the CFT’s commitment to effectively investigate housing fraud by **recovering properties from 37% of tenancy fraud referrals**. As in previous quarters this high level of performance can be partly attributed to the quality of referrals received by the CFT from Housing Services.
- 3.1.4 As part of the CFT’s proactive fraud prevention work, in-depth checks are carried out for all **Right to Buy (RTB)** applications. **5 cases of suspected RTB fraud** are currently being investigated, with 2 of the suspected fraudulent cases now in the final stages of notice due to the CFT’s investigations. Updated loss prevention savings in relation to these cases will be presented within the Quarter 2 (Q2) progress report.

- 3.1.5 Q1 has seen the commencement of the **Annual Temporary Accommodation housing project** in which the CFT conduct unannounced visits to each property to confirm occupancy and verify the details of the current resident(s). This also ensures that any changes of circumstances are reflected correctly across internal systems, and the data that we hold is accurate. In total **225 properties have been identified**, of which 160 have been visited. Currently, the project has highlighted **2 cases of mis-claimed single person discount**. The project is in its early stages and further updates will be provided in the Q2 report.
- 3.1.6 The proactive visits for the **Bed and Breakfast (B&B) emergency accommodation project** were concluded in Q1. A total of 181 B&B properties were subject to unannounced residency checks. These visits identified 7 cases of suspected non-occupation and subletting for further investigation, with 1 case closed resulting in savings of **c£10k**. The remaining 6 cases are currently under review with further positive outcomes expected in Q2.
- 3.1.7 Whilst Hillingdon Council no longer offer the First Time Buyer (FTB) scheme, the CFT continues its **fraud prevention work** by conducting **post-sale residency checks** on properties purchased through the scheme. Currently, **1 FTB case is under investigation** for suspected sub-letting whilst another investigation has successfully concluded resulting in a **financial saving of more than c£14k**.
- 3.1.8 As outlined in **Table 2** below, as part of the CFT's loss prevention activity, the team are responsible for undertaking checks on eligible applicants who register for social housing. **During Q1 the CFT has successfully completed 257 verifications**. These checks include gathering information on applicants' income, assets and their current living arrangements.

Table 2 ~ Housing Tenancy Verification Cases

Housing Tenancy Verification Cases	Q1*	2021/22
Total number of cases reviewed	257	2,100
% Identified by CFT for rejection	20%	24%
Total number of applications closed	3	16

* As at end of Q1 (30th June 2022)

- 3.1.9 During Q1, the CFT **closed 3 Social Housing applications**. Without the CFT's additional checks, applicants who no longer have a housing need, have no immigration status, who own their own property elsewhere or are over the threshold for savings or assets may have been successful in acquiring a council property that they were not entitled to.
- 3.1.10 KPI 2a (refer to **Table 6** in **Appendix A**) targets an outcome of **95%** of Housing allocation verifications to be completed within the target date set by the Housing department. During Q1, the CFT have overachieved this target by completing **99% of housing allocations** within the set target date. The success of achieving this target is based on efficiencies implemented within the team's verification process as well as through risk-based changes.
- 3.1.11 As listed above the CFT has conducted a significant amount of counter fraud activity within the area of Housing. With the unprecedented levels of tenancy fraud found over the last 3 quarters, this level of activity is likely to continue throughout the financial year.

3.2 Revenues Fraud & Inspections

3.3.1 Per **Table 3** below, in Q1 the CFT has **conducted 2,077 inspections, with 2,068 (99%) visited within the 10-day KPI target**. The CFT has consistently maintained a high level of performance to exceed their KPI target (refer to **Table 6** at **Appendix B**). The team has been proactive in adapting to meet the demands of the role whilst adding value by maximising the Councils revenue stream.

Table 3 ~ Revenues Inspections Performance 2022/23

Revenues Inspections	Q1*	2022/23	2021/22
Total number of inspections completed	2,077	2,077	9,138
Percentage within 10 day target	99%	99%	97%

* As at end of Q1 (30th June 2022).

3.3.2 A total of **20 previously unlisted properties** including **4 Beds in Sheds'** have been identified via proactive projects and referrals from internal or external sources. All these properties have been added to the Council Tax listings. A further six properties are pending a decision from the Valuation Office Agency (VOA). As a result, over **£35k of loss prevention savings** have been identified following the issuance of revised Council Tax bills to the households in question.

3.3.3 The **Revenues Maximisation** project has continued to successfully identify previously unlisted or amended businesses. A **total of £1.3m** of previously uncollected revenue has been identified with **83%** of the total due to the proactive efforts of the CFT. The remaining 17% is attributed to the teams work with external partner agencies. Further positive results are expected to be reported in Q2 once confirmation has been received from the VOA. As mentioned previously within this report, these exceptional items are of significant value to the Council and highlight the importance of the project, although it is expected as the project continues the identification of high value items will decrease significantly. The project is still expected to identify uncollected revenue but at progressively lower value.

3.3 Energy Rebate Scheme

3.3.1 The Energy Rebate Scheme has been introduced by the Government to assist households with the rising energy costs. A £150 non-repayable council tax rebate will be issued to all qualifying households in council tax bands A to D.

3.3.2 The CFT have been assisting Exchequer Services (ES) by conducting **Spotlight bank account verification checks** for residents who have been asked to supply their bank account information to receive the payment. **Over 20,000 bank accounts** have been checked and the findings shared with ES colleagues to ensure only verified applicants will receive the much-needed funds.

3.6 Social Care Counter Fraud Work

3.6.1 Loss prevention and counter fraud activity within Financial Assessments (FA) has continued throughout Q1, with the CFT receiving **92 verification requests**. The verification process ensures that appropriate checks are conducted for all applicants applying for funding towards their care costs. These checks identify any anomalies such as hidden assets, income or capital prior to any funds being administered. From the 92 verification requests received this quarter, there are currently **15 cases undergoing further checks**.

3.6.2 Q1 has seen the successful conclusion of an ongoing FA investigation which led investigators to uncover financial loss across numerous fraud risks. An applicant's financial correspondent was found to have produced a tenancy agreement in a deliberate attempt to lower the applicant's financial contribution costs and failed to disclose an annex at the property. **This joint approach resulted in combined savings of over c£4k** and further demonstrates the effectiveness of the CFT's collaborative approach to ensure public funds are protected.

3.6.3 Verification checks are undertaken by the CFT for all applicants who approach Social Services for **Section 17 accommodation** and financial assistance. **Table 4** below, illustrates the outcomes and highlights the importance of these low volume, yet high monetary value cases. The CFT evidenced in **1 case** that an applicant was already adequately housed and financially supported by another borough, therefore financial assistance from the Council for the family was not required, **resulting in savings of over c£13k**.

Table 4 ~ Section 17 Verification Cases 2022/23

Section 17 Cases	Q1*	2021/22
Total number of cases reviewed	5	27
Total number verified as accurate	1	20
Total number of cases closed	1	5
Total number of cases under further investigation	3	2
Loss Prevention Savings	£13,128	£70,684

* As at end of Q1 (30th June 2022).

3.6.4 **The CFT identified savings of over c£4k for fraudulently claimed direct payments**, that had been in payment since 2018. Officers were able to evidence that family members were claiming for care payments from carers who were no longer residing in the country. Counter fraud work in this area is still under development, with the CFT engaging with key stakeholders on multiple fraud risks in Direct Payments. The HCF expects further proactive and reactive counter fraud activity will be undertaken in this area throughout the financial year.

3.7 Blue Badge Fraud

3.7.1 Q1 saw the first Blue Badge operation of 2022/23 and **the team's first ever operation targeting blue badge misuse near various train stations across the borough**. Working collaboratively with Parking Services, Counter Fraud Officers were deployed to deter Blue Badge misuse and take enforcement action against those found to be flouting the scheme.

3.7.2 For the first time no Blue Badge misuse was identified during the operation. The legitimate use demonstrates and provides assurance that misuse within these commuter locations can be considered as a low risk.

3.7.3 Following on from the team's proactive project, the CFT participated in a **London wide Blue Badge Day of Action** which saw 18 boroughs participate in a co-ordinated approach to tackle Blue Badge misuse. The day of action enabled all participating boroughs to work collaboratively in ensuring that genuine badge holders were able to access the disabled parking facilities on offer across London.

- 3.7.4 Parking Services supported the CFT’s involvement with Civil Enforcement Officers deployed alongside Counter Fraud Officers at known hot spot areas in and around Uxbridge High Street. The day of action was **extremely successful with the immense effort of everyone involved shown in Table 5 below.**

Table 5 ~ Day of Action Results 2022

Day of Action Results	18 Boroughs	LBH
Total number of badges inspected	1899	53
Blue Badges Seized	61	9

- 3.7.5 The successful contribution and outcomes achieved by the CFT saw **5 of the 9 badges seized** were due to the badges having expired, with the remaining **4 cases currently under investigation for misuse.** The day of action and the CFT’s contribution will be **published by London Council’s and will be featured in Hillingdon People.** This positive media coverage outlines the Council’s zero tolerance towards Blue Badge misuse.
- 3.7.6 In addition to the proactive counter fraud activity undertaken by the team in Q1, the team saw the conclusion of an ongoing blue badge investigation from the 2021/22 Blue Badge operation. A fixed penalty notice of **£100 and Simple Caution were administered.**

3.8 Onsite Immigration Official

- 3.8.1 The Onsite Immigration Official’s (OSIO) returned to full operational capabilities during Q1 resulting in a **significant increase in loss prevention savings.** With enhanced access to Home Office data for the purpose of assessing cases involving immigration related issues, the **OSIO identified savings of over c£42k.** These savings relate to the proactive monitoring of asylum applications, whereby service users are identified as no longer being eligible to receive financial support, accommodation or access to care provisions due to changes in their immigration status.
- 3.8.2 A working group made up of the Brokerage, Direct Payments, Children’s Resources Finance Teams’ and the CFT has been formed following the return of the OSIO. This collaborative approach has been instigated to encourage greater interaction and engagement with the OSIO. The working group will enable the sharing of knowledge and expertise of colleagues working within areas where there are known fraud risks and to increase loss prevention outcomes within Social Care.

3.9 Other Counter Fraud Activities

- 3.9.1 As part of the CFT’s commitment to strengthening the counter fraud culture within the Council, the team are continuing to carry out fraud awareness sessions to colleagues throughout the organisation. During Q1, multiple fraud awareness sessions were conducted to various services including Sheltered Housing accommodation scheme managers and Members & Complaints team. The purpose of these sessions is to raise awareness and discuss the different types of potential fraud that could occur within service areas. These sessions have proven to be successful, with the CFT receiving a fraud referral directly from one session, which has led to a tenancy fraud investigation with a positive outcome expected to be reported in Q2.
- 3.9.2 Throughout Q1 the CFT has continued to work in conjunction with colleagues from other Council services to conduct desk-based checks on the households that have applied to join the Homes for Ukraine scheme. These checks provide assurance to CMT that the applicants are in a suitable position to accept Ukrainian families fleeing from their country.

- 3.9.3 Following a successful recruitment process in Q1 the CFT **has hired 2 Counter Fraud Officers** as part of its new structure. Both officers have started in their new roles and are currently receiving training from experienced staff members. Unfortunately, 3 members of staff have handed in their notices. This will leave a resourcing gap for a period of time during Q2. The Management team are currently progressing all 3 vacancies through the recruitment process, with at least 2 of the positions to be filled during Q2.

4. Analysis of the Counter Fraud Team's Performance in Quarter 1

- 4.1 Attached at **Appendix A** is **Table 6** which sets out the Q1 performance by the CFT against the nine KPIs. Also attached at **Appendix B** is **Table 7** which provides an overview of the financial performance of the team in Q1 within each of the main areas of counter fraud activity. The CFT's financial performance should be considered against a target of £3.5m for 2022/23.
- 4.2 The CFT has achieved a consistent level of performance across all KPIs this quarter. The details of this are that **all 9 KPI's are above targeted performance**. The HCF will continue to prioritise and monitor the team's performance closely to ensure this high level of performance continues.

5. Forward Look

- 5.1 As we look forward into Q2 of 2022/23, the CFT will undertake various proactive projects to identify fraud, loss or error, including the revenues **Empty Properties project**. The proactive project aims to identify those long term empty properties that are now occupied which will maximise the Councils income through the New Homes Bonus Scheme.
- 5.2 With **114 live investigations into tenancy fraud** the CFT will prioritise this area of work, deploying significant resources to support the conclusion of these investigations and recover any properties where appropriate. Further proactive residency check projects are also planned in this area during Q2.
- 5.3 In Q2 the CFT will have 3 vacancies at various stages of the quarter. The priority is **to recruit to these vacancies** to ensure the team is fully resourced in all areas of counter fraud, so all proactive and reactive work streams are delivered in line with the Counter Fraud Annual Operational Work plan.
- 5.4 The CFT plans to upload its first sets of data into **the London Counter Fraud Hub** during Q2. The data matching exercise will look to highlight any instances of fraud, loss or error with high risk matchings being investigated by the CFT.
- 5.5 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 during this quarter. There are no other counter fraud matters that the HCF needs to bring to the attention of CMT or the Audit Committee at this time.

Alex Brown ACFS APCIP
Head of Counter Fraud

30th June 2022

Table 6 ~ CFT KPIs and Actual Performance

CFT KPIs	Target	Q1*	21/22
1. Percentage of fraud referrals risk assessed within 3 working days	95%	99%	99%
2. Verification work timescales for completion:			
a. Housing Allocations completion within the target date set by Housing	95%	99%	99%
b. Right to Buy case completion within 28 working days	95%	100%	100%
c. Financial Assessments completion within 7 working days	95%	100%	N/A**
d. Section 17 reviews completion within 7 working days	95%	100%	N/A**
3. Investigation plan completion within 5 working days of case allocation	95%	98%	99%
4. Tenancy fraud referrals received resulting in property recovery	30%	37%	33%
5. Investigations resulting in loss prevention/financial saving outcome	40%	43%	55%
6. Revenue inspections completed within 10 working days of referral date	95%	99%	97%

* As at end of Q1 (30th June 2022).

N/A** = New KPI that has been introduced in the Counter Fraud Strategy for 2022 – 2025.

APPENDIX B**Table 7 ~ CFT Quarter 1 2022/23 ~ Financial Performance**

Work Area	Description	Quarter 1*	Quarter 2	Quarter 3	Quarter 4	2021/22
Housing	Right to Buy discounts	£0	£0	£0	£0	£328,300
	Property Recovery (notional savings)	£840,000	£0	£0	£0	£756,000
	Other savings/loss prevention	£22,491	£0	£0	£0	£14,122
Social Services	Section 17 and UASC**	£13,128	£0	£0	£0	£72,203
	Financial Assessments and Direct Payments	£4,758	£0	£0	£0	£61,521
	Disabled Facilities Grants	£0	£0	£0	£0	£59,209
	Direct Payments	£4,369	£0	£0	£0	
Revenues	Single Person Discount	£5,697	£0	£0	£0	£65,105
	Council Tax Reduction & arrears	£6,910	£0	£0	£0	£19,176
	Beds in Sheds	£35,995	£0	£0	£0	£49,310
	Housing Benefit Overpayments	£5,456	£0	£0	£0	£159,892
	NNDR***	£1,391,666	£0	£0	£0	£1,362,737
Blue Badge	Simple Caution & Financial Penalty	£100	£0	£0	£0	£1,100
Immigration Officer	Housing Homelessness Applications**	£0	£0	£0	£0	£9,999
	Social Care Savings	£42,335	£0	£0	£0	£66,895
Totals	Loss Prevention Savings	£72,644	£0	£0	£0	£626,334
	Notional Savings	£2,028,372	£0	£0	£0	£2,074,220
	Cashable Savings	£271,789	£0	£0	£0	£346,500
	Costs awarded and penalties	£100	£0	£0	£0	£2,100
	Total	£2,372,906	£0	£0	£0	£3,049,154

* As at end of Q1 (30th June 2022).

** 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.

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 Grants

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

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.

Revenue 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 mitigate 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.