

Contents

The Counter Fraud key
contacts in connection with
this report are:

Alex Brown

Head of Counter Fraud t: 01895 556811

e: abrown@hillingdon.gov.uk

	Page
1. INTRODUCTION	3
2. EXECUTIVE SUMMARY	3
3. COUNTER FRAUD ACTIVITY IN Q1	4
4. COUNTER FRAUD PERFORMANCE IN Q1	8
5. FORWARD LOOK	9
APPENDIX A - CFT Q1 KPI PERFORMANCE	10
APPENDIX B - CFT Q1 FINANCIAL PERFORMANCE	11
APPENDIX C – GLOSSARY OF TERMS	12

2025/26 Quarter 1 2.

1. INTRODUCTION

The Role of the Counter Fraud Team

- 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.
- 1.2 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.

The Purpose of the Counter Fraud Progress Report

- 1.3 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 2025). 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.
- 1.4 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 2025 to 2028), which provides an opportunity for the HCF to be held to account in this respect.

2. EXECUTIVE SUMMARY

- As in recent years the economic environment coupled with local Government Financial challenges has created a perfect storm for fraud to thrive. To combat this, Hillingdon Council has continued to invest and support its Counter Fraud Service, so that it is strategically placed across areas of high risk. This approach has continued to deliver positive financial savings in 2025/26 with Q1 yielding c£4.1m against a target of £8.8m.
- 2.2 The majority of the CFT's work in Q1 has been undertaken in the area of Housing in particular reactive investigative work due to tenancy fraud. Currently the team are investigating 129 cases of Housing fraud which is consistent with previous quarters. In addition to these ongoing cases a large number of investigations have concluded in Q1, leading to the team recovering 27 properties at a notional saving of c£1.9m. The high number of properties recovered in the first quarter not only provides much needed Housing stock to those in need but demonstrates the CFT are on track to deliver a significant amount of property recovery in line with previous years.
- 2.3 During Q1 the CFT has continued to **visit emergency accommodation** provided by the Council to residents who have approached as homeless. During visits, **the CFT uncovered 5 clients were not occupying their emergency accommodation, which led to accommodation closures on all 5 cases saving c£153k.** This work is vital to ensure the Council has enough accommodation to support those in need during a time when demand is increasing. A further 9 cases are under investigation worth c£242k.
- As in previous financial years the team will continue to prioritise its work in identifying Businesses for rates that are unknown to the Council. This work involves in house proactive activity alongside data from our external suppliers. In Q1 the CFT have identified 2 businesses that were undeclared for rates, billings have now been sent out totalling c£1.6m.

2025/26 Quarter 1 3.

- 2.5 The CFT are currently involved in a Council wide Debt & Income project. The team have been piloting debt recovery visits in the area of Adult Social Care Debt. Though this is not fraud related the Council is utilising the CFT skill set in relation to conversation management, lines of enquires and negotiation tactics to increase debt recovery. This approach has led to the collection of c£19k of one-off lump sum payments and 15 payment plans set up that will recover a further c£63k over the next 12 months. This work will continue, and wider discussions are currently ongoing to introduce other areas of debt to the visiting programme.
- 2.6 As part of the CFT's transformation work that has been mentioned in previous progress reports, the management team are working with colleagues in Digital to enhance processes through the use of technology and the digitalisation of processes. The services meet regularly to push this project forward and have now mapped out existing processes in some areas ready for change. In addition, new technology has been trialled so officers can be fully mobile with access to all systems whilst in the field.

3. COUNTER FRAUD ACTIVITY IN QUARTER 1

3.1 Housing Fraud

- 3.1.1 The CFT has continued its success in property recovery from previous years in Q1. This has led to a consistently high number of properties recovered from the previous financial year, with the CFT returning 27 properties to Housing resulting in a notional saving of c£1.9m or actual budget savings of c£725k. Q1 has seen a large part of the CFT's resources deployed in Housing with the team working across multiple fraud risks and continuing with investigations of cases consisting of non-occupation, sub-let, wrongful succession and deceased.
- 3.1.2 The Key Performance Indicator (KPI) 4 (refer to <u>Table 5</u> in <u>Appendix A</u>) requires the CFT to recover 30% of properties associated with tenancy fraud referrals. This quarter the CFT has achieved 67% of tenancy fraud referrals resulting in property recovery. As per <u>Table 1</u> below, the case type of property recovery shows that non-occupation is still the highest area of tenancy fraud risk.

Case Type	Q1*	£k/value**
Abandonment	0	£0
Deceased	13	£910k
NFI Fraud Hub	2	£140k
Non-Occupation	8	£560k
Other	1	£70
Sub-Let	1	£70k
Wrongful Succession	2	£140k
Total Properties Recovered	27	£1,890k

Table 1 ~ Housing Tenancy Fraud Cases

- 3.1.3 Tenancy fraud remains the highest fraud risk faced by the Council, with the CFT currently investigating 129 cases relating to tenancy fraud. The team have been granted 7 possession orders following legal proceedings, which are awaiting enforcement action, and a further 41 criminal and civil cases are currently with our legal team.
- 3.1.4 In Q1 the team have also continued with proactively identifying cases of unknown deceased tenants with the assistance of the NFI Fraud Hub. The details of this work can be found in subsection 3.6 of this report. This work, though not classed as fraud, has continued to contribute to the number of properties recovered.

2025/26 Quarter 1 4.

^{*} As at end of Q1 (30th June 2025).

^{**} Tenancy Fraud Forum valuation.

- 3.1.5 The Council's **Key Amnesty campaign was launched in Q1 and ran for 6 weeks,** designed to highlight to residents that **social housing fraud is a crime,** and any cases will be investigated by the Council. The amnesty gave anyone mis-using their council property, an opportunity to **surrender their tenancy** within a set period of time with no further legal action being taken. To raise awareness of the amnesty, an extensive communications campaign was run across the Council's social media platforms, Hillingdon People and Council website. Posters were put up in libraries, noticeboards across the borough and in public areas of the Civic Centre. The campaign was also picked up by other counter fraud professionals on their Linked-In accounts and other social media platforms. The campaign resulted in **one property being recovered, alongside an increase of housing fraud referrals by 78%** during the amnesty period.
- 3.1.6 In Q1, the CFT has continued with a proactive project conducting residential checks on the bungalow stock within the borough. The purpose of the project was to highlight potential cases of non-occupation or sub-letting. In total 353 properties have been visited so far which has resulted in one bungalow recovered due to non-occupation and additional savings of c£2k for incorrect claims of council tax discounts. Additional outcomes will be reported in Q2 based on a further 3 cases having been highlighted for potential non-occupation and 22 cases are still undergoing further enquiries.
- 3.1.7 The CFT have continued to proactively look at internally sourced data which can highlight discrepancies and result in property recovery or other financial savings such as council tax discounts and exemptions. These data projects include key fob usage in some of our low- and high-rise buildings, highlighting concerns of non-occupation, and council tax exemptions against social housing stock. In Q1 the CFT have recovered 12 properties from analysing data and acting proactively to ensure the housing stock is utilised efficiently.
- 3.1.8 The ongoing pressures in the current economic climate continue to cause an increase in demand for housing and the need for **Bed and Breakfast (B&B) emergency accommodation.** Therefore, for 2025/26, the CFT will continue its rolling proactive project conducting residency checks to all emergency accommodation placements, to highlight any instances of non-occupation or subletting. In Q1 the CFT has closed 5 emergency accommodation units due to non-occupation, resulting in savings of c£153k. A further 9 cases have been opened highlighting concerns of suspected non-occupation.
- 3.1.9 The CFT carries out verification checks on all Right to Buy (RTB) applications submitted to the Council, to provide assurance that those who apply are eligible for the significant discount and that the funds used for the purchase abide by money laundering regulations. In Q1 the CFT has cancelled one RTB application saving c£98k and have 8 cases under investigation for suspicion of sub-letting and non-occupation, with 3 cases referred to our Legal department to instigate criminal proceedings based on fraud offences. The CFT has also closed two RTB applications at verification stage due to the failure to provide financial information.
- 3.1.10 As part of the commitment to a risk-based approach the verification of housing allocations has been returned to the service area to continue as a business as usual function as the previous work carried out by the CFT has significantly reduced the risk in this area. The Key Performance Indicator (KPI) 2(a) in previous reports has been retired as a result of this change.

3.2 Revenues Fraud & Inspections

3.2.1 In the area of Revenues, the CFT has continued to maintain a high level of performance and again exceeded their KPI target (refer to <u>Table 5</u> at <u>Appendix A</u>). In Q1, as detailed in <u>Table 3</u> below, the CFT has conducted 1,841 inspections, with 1,836 (99%) visited within the 10-day KPI target.

Table 3 ~ Revenues Inspections Performance 2025/26

Revenues Inspections				Q1*
Total comple	number eted	of	inspections	1,841
Percentage within 10 day target			99%	

*As at end of Q1 (30th June 2025).

- 3.2.2 During Q1 the CFT has identified a further **22 previously unlisted properties** made up of 'Beds in Sheds'. As a result, an additional c£29k of loss prevention savings has been identified following the issue of revised Council Tax bills to the liable parties. Throughout the financial year the CFT will continue to work with other Council departments to identify beds in sheds and take appropriate action.
- 3.2.3 During Q1 the CFT have continued the programme of internal Revenues Maximisation and carried out a day pro-active monitoring to identify unlisted buildings and changes to the use of land. This has identified two previously unlisted business premises with additional billing in Q1 issued to businesses to the value of c£1.6m.

3.3 Social Care

- 3.3.1 In Q1 CFT officers have been conducting a pilot exercise to recover outstanding social care debt by visiting residents to establish their means to pay and make arrangements for outstanding debt to be recovered. This groundbreaking work has resulted in initial payments of £19,768 being made during Q1 with a further 15 payments plans being established which will result in additional c£63k being recovered over the next 12 months.
- 3.3.2 With preventive controls and reactive processes in place across fraud risks within Social Care, Q1 marks a successful quarter for the team with c£61k in loss prevention savings identified. These positive outcomes have stemmed from a range of workstreams including the Financial Assessment verification process, tracing service users and the verification of residents receiving Section 17 support.
- 3.3.3 In line with the CFT's risk-based loss prevention work within Financial Assessments has continued throughout Q1, with the team conducting 160 financial assessment verifications, 8 of which are undergoing further checks. The verification process is designed to identify anomalies, such as hidden capital or assets prior to financial support being administered and to provide assurance that only eligible applicants are provided support.
- 3.3.4 Section 17 of the Children's Act 1989 places a duty on the Council to safeguard and promote the welfare of children in need. Section 17 support offers a range of services that includes providing accommodation and/or financial assistance to eligible applicants. The CFT undertake verification checks for all Section 17 applicants who approach Social Care.

 Table 4 over the page, illustrates the outcomes derived from the preventive measures in place that ensure services provided are only accessed by those who meet the eligibility criteria.

Section 17 Cases	Q1
Total number of cases reviewed	14
Total number verified as accurate	10
Total number of cases closed	1
Total number of cases under further checks	3
Loss Prevention Savings	£3544

Table 4 ~ Section 17 Verification Cases 2025/26

3.3.5 In addition to verification checks the CFT also conduct a proactive Section 17 project, with counter fraud officers deployed to highlight cases of sub-letting and non-occupation of Social Care accommodation. With placements provided both inside and outside of the borough, counter fraud officers have begun conducting unannounced visits to all 88 service users, with outcomes expected to be reported in Q2.

3.4 Blue Badge

3.4.1 Cases from previously reported Blue Badge operations and referrals from residents have continued to progress during Q1 with the successful prosecution of 5 Blue Badge cases. The evidence of these criminal cases was heard at Ealing Magistrates Court with a total of £1,338 in prosecution costs awarded to the Council and £1,240 in fines issued to offenders. A further 7 cases are due to be heard in court, with outcomes expected to be reported in Q2.

3.5 Onsite Immigration Official

3.5.1 Q1 marked a successful quarter in the area of immigration with £10,265 in loss prevention savings identified. These savings can be contributed to the team's proactive approach within in Social Care by highlighting a change in 3 service users immigration status and the collaborative steps taken by CFT and the Children's Resources Finance Team to support each service user to access public funds. These changes in immigration status relieves the Council from financially supporting each service user and encourages independence. Further savings have been identified and re awaiting feedback from service areas. These outcomes will be reported in Q2.

3.6 London Counter Fraud Hub

- 3.6.1 The CFT is recognised as a leading member of the London Counter Fraud Hub. The hub is designed to bring London Boroughs together, sharing data to identify fraud, loss or error. This innovative approach will also use the power of data to uncover cross borough frauds.
- 3.6.2 The unique capabilities of the LCFH are now embedded in the CFT and this is producing referrals automatically every two weeks identifying cases where the Council may not be aware of tenants passing away. This has maximised loss prevention by ensuring that cases are identified at an early stage. A total of **two council properties** have been recovered and returned to use as a result of information provided by the LCFH during Q1.

3.7 National Fraud Initiative

3.7.1 The National Fraud Initiative (NFI) is a data matching exercise co-ordinated by the Cabinet Office and conducted every 2 years. The NFI matches data from over 1,300 organisations, including councils, the Police, hospitals and almost 100 private companies to identify potential fraud and error.

^{*} As at end of Q1 (30th June 2025).

- 3.7.2 The CFT have dedicated significant resource in to analysing the Data provided by the 2024/25 National Fraud Initiative exercise which has led to savings in a variety of work streams.
- 3.7.3 Information received from the NFI has led to **the closure of 40 Housing Register applications** where applicants had failed to declare changes in their circumstances and were no longer entitled to seek housing assistance from the council. A further 62 cases are with the Housing Team to review.
- 3.7.4 Reviewing cases where the NFI had identified changes in the income and capital of recipients of Council Tax Reduction (CTR) has led to overpayments of c£35k which will be added to revised Council Tax Billing.
- 3.7.5 The Resident Hub have assisted with processing NFI records which indicated that the Council had not been notified when blue badge holders had passed away leading to 181 blue badges being cancelled removing them from circulation and helping to prevent misuse of the scheme.
- 3.7.6 The NFI identified 4 cases of polygamous employment where Council employees were simultaneously working for more than one authority. Investigations by the CFT have led to 2 employees resigning from employment with Hillingdon, one being issued with a final written warning and one further employee being dismissed for gross misconduct. One case remains under investigation with a view to criminal proceedings being issued.

3.8 Other Counter Fraud Activities

- 3.8.1 As part of the CFT's strategic objectives, the team has been embedding and promoting a counter fraud culture throughout the Council, by regularly undertaking fraud awareness sessions to service areas. These sessions give teams the tools to identify, and report suspected fraud or loss. During Q1 the CFT conducted **fraud awareness sessions** with Housing staff.
- 3.8.2 Following the CFT being shortlisted at the annual Counter Fraud Awards in Q4 last year, the CFT have continued to be recognised as a leading authority in combatting fraud. During Q1 a Counter Fraud Manager from the CFT was invited to present at a meeting of the South West London Fraud Partnership and as a main speaker at the Tenancy Fraud Forum annul conference to share best practice in tackling temporary accommodation fraud. This has resulted in a number of other authorities contacting the CFT to discuss the approach to this type of work.
- 3.8.3 Also during Q1 the CFT were invited to address the Cabinet Office department responsible for the operation of the NFI and NFI FraudHub systems to provide feedback on the current use of the systems and offer input into future developments.

4. COUNTER FRAUD PERFORMANCE IN Q1

4.1 Attached at <u>Appendix A</u> is <u>Table 5</u> which sets out the Q1 performance by the CFT against the nine KPIs. Also attached at <u>Appendix B</u> is <u>Table 6</u> 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 £8.8m for 2025/26.

4.2 The CFT has achieved a consistent level of performance across KPI's throughout the quarter. The details of this are that **9 out of 9 KPI's are above targeted performance**. The management team are pleased that all KPI's have been met and will be working closely with the team to ensure this level of performance is sustained.

5. FORWARD LOOK

- As part of the CFT's transformation programme the management will be designing a Power BI dashboard to capture all fraud activity, outcomes, KPI's and ROI. The build phase will take place over Q2 and Q3 with a view that it will replace the current progress reports to committee.
- 5.2 With data at the centre of CFT activity, further data matching work to proactively detect fraud will take place in Q2. The team plans to undertake further Housing data matching and start data matching in the area of Social Care once the Legislative Reform Order has passed through parliament.
- 5.3 As part of the CFT's fraud awareness package officers will refresh the current e-learning module. The module will cover subjects including fraud, money laundering, bribery and reporting. The CFT will then look to release the new module as part of international fraud awareness week in November.
- 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 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 APCIP Head of Counter Fraud 30th June 2025

2025/26 Quarter 1 9.

APPENDIX A: Table 5 - CFT KPIs and Actual Performance

CFT KPIs	Target	Q1*	25/26*	24/25
Percentage of fraud referrals risk assessed within 3 working days	95%	100%	100%	99%
Verification work timescales for completion:				
Right to Buy case completion within 28 working days	95%	100%	100%	98%
b. Financial Assessments completion within 7 working days	95%	100%	100%	100%
c. Section 17 reviews completion within 7 working days	95%	93%	93%	100%
Investigation plan completion within 5 working days of case allocation	95%	100%	100%	100%
Tenancy fraud referrals received resulting in property recovery	30%	67%	67%	71%
Investigations resulting in loss prevention/financial saving outcome	40%	36%	36%	47%
Revenue inspections completed within 10 working days of referral date	95%	99%	99%	99%

^{*} As at end of Q1 (30th June 2025).

2025/26 Quarter 1 10.

APPENDIX B: Table 6 - CFT Quarter 1 2025/26 Financial Performance

Work Area	Description	Quarter 1*	Quarter 2	Quarter 3	Quarter 4	2025/26*
	Right to Buy discounts	£98,800	£0	£0	£0	£98,800
Housing	Property Recovery (notional savings)	£1,890,000	£0	£0	£0	£1,890,000
	Other savings/loss prevention	£233,404	£0	£0	£0	£233,404
Social Care	Section 17 and UASC**	£3,544	£0	£0	£0	£3,544
Social Cale	Financial Assessments	£11,295	£0	£0	£0	£11,295
	Direct Payments	£0	£0	£0	£0	£0
	Other (Including Debt Visits)	£129,830	£0	£0	£0	£129,830
	Single Person Discount	£7,307	£0	£0	£0	£7,307
	Council Tax Reduction & arrears	£37,323	£0	£0	£0	£37,323
Revenues	Unlisted Buildings	£29,366	£0	£0	£0	£39,366
	Housing Benefit Overpayments	£1,086	£0	£0	£0	£1,086
	NNDR	£1,639,354	03	£0	£0	£1,639,354
Blue Badge	Simple Caution & Financial Penalty	£2,578	£0	£0	£0	£2,578
Immigration Officer	Housing Homelessness Applications**	£0	£0	£0	£0	£0
	Social Care Savings	£10,265	£0	£0	£0	£10,265
	Loss Prevention Savings	£403,774	£0	£0	£0	£403,774
	Notional Savings	£3,246,832	£0	£0	£0	£3,246,832
Totals	Cashable Savings	£452,271	£0	£0	£0	£452,271
	Costs awarded and penalties	£2,578	£0	£0	£0	£2,578
	Total	£4,105,455	£0	£0	£0	£4,105,455

^{*} As at end of Q1 (30th June 2025).

2025/26 Quarter 1 11.

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

APPENDIX C - 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 coordinated 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.

2025/26 Quarter 1 12.

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.

Tenancy Fraud Forum Valuation: 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.

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.

2025/26 Quarter 1 13.