


<p>London Borough of Hammersmith & Fulham</p> <p>AUDIT, PENSIONS AND STANDARDS COMMITTEE</p> <p>17 JULY 2018</p>	
<p>CORPORATE ANTI-FRAUD SERVICE END OF YEAR REPORT 1 APRIL 2017 TO 31 MARCH 2018</p>	
<p>Report of the Director of Audit, Fraud, Risk and Insurance – David Hughes</p>	
<p>Open Report</p>	
<p>Classification: For Information Key Decision: No</p>	
<p>Consultation: N/A</p>	
<p>Wards Affected: None</p>	
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1. EXECUTIVE SUMMARY

- 1.1 This report provides an account of fraud related activity undertaken by the Corporate Anti-Fraud Service (CAFS) from 1 April 2017 to 31 March 2018.
- 1.2 CAFS remains a shared service covering three Councils and continues to reap the benefits of sharing skills and expertise, identifying best practice and the streamlining of anti-fraud related policies and procedures.
- 1.3 CAFS continues to provide the London Borough of Hammersmith & Fulham with a full, professional counter fraud and investigation service for fraud attempted or committed against the Council.
- 1.4 Since April 2017 CAFS identified 149 positive outcomes, including over 100 tenancy and housing-related successes. For the period 1 April 2017 to 31 March 2018, fraud identified by CAFS has a value of over £1.2million and is detailed in the following table.

	2016/17	2017/18
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Activity	Fraud proved	Notional Values (£'s)	Fraud proved	Fraud Value (£'s)	Notional Values (£'s)
Housing Fraud (including applications, assignments & successions)	17	261,000	25	38,600	450,000
Right to Buy	42	4,363,800	52	107,780	5,356,000
Pro-active operations	-	0	7	10,500	10,500
Prevention subtotal	59	4,624,800	84	156,880	5,816,500
Tenancy Fraud (Council and Registered Providers)	21	990,000	26	186,950	1,247,000
Internal Staff	4	32,000	2	1,500	28,000
High/Medium risk fraud – NNDR, Procurement, ASC/FCS	19	397,800	7	745,632	1,080,281
Low-risk fraud – Parking, Accessible Transport, and Council Tax SPD	18	15,667	12	5,090	12,336
Detection subtotal	62	1,435,467	47	939,172	2,367,617
Proceeds of Crime awarded	8	662,073	7	78,907	360,314
Proceeds of Crime repaid from award	6	310,551	4	30,794	30,794
Press releases and publicity	10	-	7	14,500	14,500
Deterrence subtotal	24	972,624	18	124,201	405,608
Total	145	7,032,891	149	1,220,253	8,589,725

2. RECOMMENDATION

2.1 Note the fraud work undertaken during the year 1 April 2017 to 31 March 2018.

3. REASONS FOR DECISIONS

3.1 To inform the Committee of the actions taken in accordance with the Council's Anti-Fraud and Corruption Strategy and the successful outcomes achieved through the counter fraud response in 2017/18.

4. ANTI-FRAUD AND CORRUPTION STRATEGY

4.1 The Council's Anti-Fraud & Corruption Strategy is based on three key themes: Acknowledge, Prevent and Pursue, and is aligned with the National Strategy: *Fighting Fraud and Corruption Locally*.

4.2 The Strategy places emphasis upon the following anti-fraud activities:

- i. **Acknowledge:** recognising and understanding fraud risks and committing support and resource for tackling fraud to maintain a robust anti-fraud response.

- ii. **Prevent:** preventing and detecting more fraud by making better use of information and technology, enhancing fraud controls and processes and developing a more effective anti-fraud culture.
- iii. **Pursue:** punishing fraudsters and recovering losses by prioritising the use of civil sanctions, developing capability and capacity to investigate fraudsters and developing a more collaborative and supportive law enforcement response.

5. ACKNOWLEDGE, PREVENT, PURSUE

(i) ACKNOWLEDGE

Committing support and resource for tackling fraud

- 5.1 CAFS have recognised the need for a support officer to help facilitate and co-ordinate CAFS investigations. To meet this demand, we have now created and recruited to a new "Assistant Investigator" post; the successful candidate was an apprentice who had previously worked within CAFS on the apprenticeship scheme before her substantive appointment.
- 5.2 During the forthcoming financial year officer development will continue, and it will include the CIPFA Accredited Counter Fraud Specialist course and refresher training for officers who already hold a Counter Fraud Accreditation.

Maintain a robust anti-fraud response

- 5.3 There are three critical elements of the operational plan that underpins and drives the Anti-Fraud and Corruption Strategy, and CAFS refer to this as the *Fraud Resilience Triangle*. The triangle is formed of:
 - 1) Fraud Risk Register (*Acknowledge*)
 - 2) Pro-Active Work Programme (*Prevent*)
 - 3) Reactive Referrals (*Pursue*)
- 5.4 Responding solely with reactive referrals often fails to provide the levels of coverage required to maintain a robust anti-fraud response. Therefore, during 2017/18 CAFS have begun to dedicate resources to pro-active operations and fraud reviews.
- 5.5 Guided by the fraud risk register, CAFS undertook five reviews during the year, and details of actions are reported in *Appendix 1*.
- 5.6 Combining pro-active work plans with reactive capability increase the chances of fraud detection. But regardless of how successful a proactive fraud operation may be in detecting fraud, it can always serve as a deterrent if the work is done visibly and if it is performed in areas that fraud perpetrators may consider operating.

(ii) PREVENT

Corporate investigations

- 5.7 Corporate investigations are defined as fraud cases which relate to employee fraud or other third party fraud which does not fall within a particular CAFS service areas such as Housing or Tenancy Fraud.
- 5.8 Since 1 April 2017 work in this area has resulted in:
- Business rate fraud including;
 - The successful prosecution and imprisonment (18 months) for an offender who tendered counterfeit documents to avoid a business rates liability, and
 - The detection of a business rate fraud which resulted in the removal of charitable relief and repayment of £988,000
 - Pension fraud
 - Single person discount fraud
 - Accessible transport fraud

Housing/Tenancy Fraud

- 5.9 CAFS provides an investigative service to all aspects of housing, including the verification applications for housing support, as well as applications for the succession or assignment of tenancies. CAFS also investigate allegations of subletting or other forms of tenancy breaches as well as the checking of all right to buys.
- 5.10 For the period 1 April 2017 to 31 March 2018, CAFS had successfully prevented four false successions/assignments and removed 21 persons from the housing register when investigations revealed they were no longer in need of support.
- 5.11 CAFS have also recovered 25 properties including two four-bedroom and two three-bedroom properties, all of which are in high demand and can now be allocated to families in genuine need of assistance. Of the 25 recoveries, 16 involved the return of keys and vacant possession without the need for lengthy and costly legal action and ensuring properties could be promptly reallocated.
- 5.12 A further seven cases are currently lodged with the Council's solicitors awaiting a court date.

Right to Buy (RTB)

- 5.13 CAFS apply an enhanced fraud prevention process to all new RTB applications, including anti-money laundering questionnaires as well as financial and residential verification.
- 5.14 For the period 1 April 2017 to 31 March 2018, CAFS have successfully prevented 52 Right to Buys from completion, where suspicion was raised as to the tenant's eligibility or financial status. In many instances, these have been as a result of the tenant voluntarily withdrawing their application once checking commenced.
- 5.15 In three cases, the checks undertaken to verify the RTB have uncovered additional criminality, namely subletting, and resulted in the properties being recovered as well as the RTBs being stopped.
- 5.16 The prevention work undertaken by CAFS in respect of RTB continues to protect valuable Council stock.

National Fraud Initiative (NFI)

- 5.17 A vital component of the of the anti-fraud and corruption strategy is making better use of information and technology. To this effect, CAFS participate in the National Fraud Initiative (NFI) which is a data matching exercise carried out by the Cabinet Office.
- 5.18 The exercise matches electronic data within and between public and private sector bodies to identify inconsistencies which then require further investigation.
- 5.19 The Cabinet Office refer the high-risk cases as "recommended matches" and expect Councils to prioritise them. CAFS identified 1,250 recommended matches, and the table below shows the result of CAFS progress:

Fraud identified	Errors	On-going	Closed no fraud	Outstanding
15	117	32	1,044	42

- 5.20 The 15 fraud cases were individuals being removed from the Council's waiting list because they had now acquired housing outside of Hammersmith & Fulham and were no longer eligible. The Cabinet Office valued the fraud identified as £45,360.
- 5.21 The cases recorded as error all involved housing benefit where the recipient had a change in circumstance but had failed to inform the Council, e.g. increased income. Once all 117 benefit claims had been corrected a total of £337,548 was identified as being overpaid.

(iii) PURSUE

Deterrence

5.22 Stopping fraud and corruption from happening in the first place must be our primary aim. However, those who keep on trying may still succeed. It is, therefore, essential that a robust enforcement response is available to pursue fraudsters and deter others.

Proceeds of Crime Act 2002 (POCA)

5.23 Prompt and efficient recovery of losses is an essential component in the fight against fraud, and the Proceeds of Crime Act is a crucial part of the Council's counter fraud strategy.

5.24 For the period 1 April 2017 to 31 March 2018, CAFS were awarded compensation of £78,907 of which £30,794 has been recovered. A further £15,900 was paid to HM Courts Service before the end of the financial year, but this has yet to be paid to the Council's accounts and will be recorded next year. Currently, four cases are lodged with Legal Services.

5.25 The Act remains a powerful deterrent and is deployed by the Council where appropriate to recover fraud losses and deter potential fraudsters. The use of POCA by CAFS makes fraudsters aware that every effort will be made by the Council to recoup losses and confiscate assets gained as a result of criminal activity.

6. LOCAL GOVERNMENT TRANSPARENCY CODE

6.1 The Local Government Transparency Code 2015 sets out key principles for local authorities in creating greater transparency through the publication of public data.

6.2 The Government believes that in principle all data held and managed by local authorities should be made available to local people. The Government believes that local people are interested in how their authority tackles fraud and have introduced a mandatory requirement in respect of fraud data.

6.3 The table on the following page shows current activity in respect of the required data for the financial year ending 31st March 2018:

Information	17/18
Number of occasions they use powers under the Prevention of Social Housing Fraud (Power to Require Information) (England) Regulations 2014, or similar powers	101
Total number (absolute and full-time equivalent) of employees undertaking investigations and prosecutions of fraud	6.5
Total number (absolute and full-time equivalent) of professionally accredited counter fraud specialists	4.5
Total amount spent by the authority on the investigation and prosecution of fraud, and	£445,600

Information	17/18
Total number of fraud cases investigated	174

7. EQUALITY IMPLICATIONS

7.1 There are no equality implications arising from this report.

8. LEGAL IMPLICATIONS

8.1 The Corporate Anti-fraud Service is responsible for ensuring that investigations are carried out in accordance with relevant legislation and work with Legal Services on identifying and pursuing cases which are suitable for prosecution.

9. FINANCIAL IMPLICATIONS

9.1 The Counter Fraud Plan is delivered within the service budget.

10. IMPLICATIONS FOR BUSINESS

10.1 There are no implications for business arising from this report.

11. COMMERCIAL IMPLICATIONS

11.1 There are no commercial implications arising from this report.

12. IT IMPLICATIONS

12.1 There are no ICT implications arising from this report.

13. RISK MANAGEMENT

13.1 The Counter Fraud Strategy and plan are developed and delivered to cover dealing with reactive fraud referrals, carrying out proactive fraud exercises to assist management in putting effective anti-fraud controls in place.

LOCAL GOVERNMENT ACT 2000
LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT

None.

PRO-ACTIVE OPERATIONS

Source	Fraud Review	Details	Risk
<p>Fraud Risk Review</p>	<p>Special Events and Filming</p> <p>The objectives of the Fraud Risk Review are to understand the business processes and the prevalent fraud risks, review the existing anti-fraud controls and assess the overall fraud risk for inclusion in the Fraud Risk Register.</p>	<p>A review of the service's assessment of the risk of fraud and the controls in place to prevent and detect it.</p> <p>The key risks identified included bribery and corruption and cash handling, but officers found these risks were mitigated through transparency, low-value transactions and minimal cash transactions.</p> <p>The Risk Review assessed the fraud risk a Low with recommendations for improvement agreed in the following areas:</p> <ul style="list-style-type: none"> • Due diligence: Checks on applicants are undertaken as part of a due diligence process. • Spot checks: Unannounced site visits to ensure compliance with the agreed filming contract or event specifications. 	<p>LOW - 3</p>
<p>Pro-active counter fraud work plan</p>	<p>Procurement Cards</p> <p>The objectives of this activity were to undertake a review of procurement cards and to establish the level of fraud risks by examining;</p> <ul style="list-style-type: none"> • Policy and procedures • Supervisor and managerial controls • Substantive testing of transactions 	<p>A review of the Procurement Cards revealed that there were only 16 cards issued and that all transactions, which are limited, are published as part of the Council's transparency data.</p> <p>Currently, Corporate Finance, who oversees the service, is planning to move to a new managed service provider for the Procurement Cards.</p> <p>Given the pending changes, the policy and procedures, supervisory and managerial controls were all reviewed as satisfactory, and a deep delve transactional review will be undertaken when the new managed service provider is in place.</p>	<p>Findings of the exercise have reduced the level of fraud risk in this area.</p> <p>Reduced ↓</p>

<p>Investigation led to Service Review</p>	<p>Housing Department</p> <p>The application forms used for:</p> <ul style="list-style-type: none"> • Tenant change of name • Succession • Assignment <p>The objective of this review was to assess the forms currently in use and evaluate the deterrence to fraud and the robustness for anti-fraud purposes.</p>	<p>CAFS was asked to investigate an assignment application by a tenant. As part of the investigation, the tenant's assignment forms were reviewed, during which CAFS officers identified several areas for improved controls.</p> <p>CAFS undertook a review of all applications to ensure they contained robust questions and asked for appropriate information.</p> <p>Revised declarations were recommended for three forms including the succession application form which required additional questions. These included the addition of address history to bring the form into line with housing applicants, and questions regarding property ownership and other assets were also enhanced.</p> <p>On the assignment form recommendations included the introduction of a section for the existing tenant and the proposed tenant focusing upon current financial circumstances and asset ownership.</p>	<p>The introduction of improved controls at application stage has reduced the risk of fraud.</p> <p style="text-align: center;">All recommendations accepted</p> <p style="text-align: center;">Reduced ↓</p>
<p>Counter fraud work plan</p>	<p>RTB improvements</p> <p>The audit of the Right to Buy process in 2016/17 identified four areas for improvement, and these were treated as actions for completion in the 2017/18 Counter fraud work plan:</p>	<p>All actions have been completed, and they were;</p> <ol style="list-style-type: none"> 1) Version controlled process maps and form. 2) Homebuy have developed their processes so that a set of spreadsheets detailing the ongoing cases is shared with CAFS and Legal on a regular basis to ensure no case is overlooked. 3) Legal Services will not complete sales without Anti-Money Laundering (AML) approval from CAFS. Once AML and background checks are complete, Legal and, Homebuy are notified of the findings. 4) Checks to only be carried out once a case has been "admitted" and risk assessed. A record of the final communication with Homebuy on the outcome is retained. 	<p>The changes had improved processes and ensured documented procedures are made available, but no changes to the level of fraud risk.</p> <p style="text-align: center;">No change ↔</p>

<p>Pro-active counter fraud work plan</p>	<p>Data Analytics</p> <p>Applying analytic data techniques, including Benford's Law, against payment data to identify discrepancies for further investigation.</p> <p>Using analytics gives the work;</p> <ul style="list-style-type: none"> • Credibility • risk-based analysis • coverage, and • focus 	<p>Quarter one, two and three data for all Council payments and all Procurement Card transactions analysed. The payment frequencies and amounts showed no significant peaks or troughs which might signify potential fraud or require closer inspection or sampling.</p>	<p>The analytics provide assurance but insufficient data to amend risk scores which remain unchanged.</p> <p>No change ↔</p>
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NOTEWORTHY INVESTIGATIONS

	Case Description
1.	<p>TENANCY FRAUD – CAFS were sent a referral that suggested the tenant of an Aspen gardens flat was living in Berkshire. Searches of finance records revealed a mortgage which was traced to a property in Wokingham, Berkshire, purchased in 2013.</p> <p>There was no evidence to suggest the Aspen Gardens address was being sublet, but when the tenant was found at the Wokingham address it became clear this was her main and principal home, and not her H&F property.</p> <p>Following a long informal interview, the tenant agreed to surrender the property back to the Council and the two-bedroom property was returned for reallocation.</p>
2	<p>PROCEEDS OF CRIME (POCA) - In January 2017 a tenancy fraudster, who sublet her Cairns House flat, was found guilty following a four day trial at Isleworth Crown Court. She was sentenced to 18 months' imprisonment, suspended for two years with a requirement that she completes 250 hours of unpaid work. Additionally, the Council also served POCA papers, claiming that she had made unlawful profit from the subletting.</p> <p>In December 2017, almost a year later, a confiscation hearing took place before His Honour Judge Ferris. The Council showed credits to the defendants account more than £35,000, and it was argued that these credits were the proceeds of her crime, namely illegally subletting social housing and the Judge found in favour of the Council.</p> <p>However, the defence also claimed their client had no assets to repay any amounts, but the Council's Financial Investigator was able to show hidden assets totalling £20,000.</p> <p>The Council were awarded a confiscation order for the sum of £20,000, and the defendant ordered to pay within three months, or else the defendant will face a period of imprisonment of six months. The defendant was also ordered to pay costs of £750 within six months.</p>
3.	<p>TENANCY FRAUD – CAFS were alerted to a potential fraud when the Council Tax Department received information that suggested a council tenant in Seagrave Road was now living overseas and that his property was left empty.</p> <p>Unnotified visits to the property were unsuccessful, but the door to door enquiries with neighbours suggested that the tenant had moved to Northern Ireland. One neighbour even confirmed that they had helped him arrange a removal service via the internet.</p> <p>Further background and financial enquiries corroborated the intelligence, and a notice seeking possession was served. This prompted the tenant to contact the scheme manager and keys were returned providing housing with vacant possession of a one-bedroom property.</p>

<p>4.</p>	<p>TENANCY FRAUD/RTB – As part of the fraud prevention programme CAFS review and verify all Right to Buy (RTB) applications, and it was during this process that several discrepancies were identified on an RTB for Vereker Road.</p> <p>Several visits were made to the address to discuss the application further, but the door was answered by a young male who said the tenant was not at home but refused to provide any further information. This was the fourth occasion the investigator had failed to see the tenant, and now the officer suspected possible subletting.</p> <p>The investigation then revealed a possible link for the tenant with Holland and checks with the Home Office, and financial enquiries found the tenant living in The Hague. Contact was finally made with the tenant, and it transpired that she had vacated the UK over two years ago and began a new life in Holland, but was considering returning to the UK.</p> <p>When challenged regarding her intention to return it became clear this was not true, and when the investigator began to explain the options the Council were considering, the tenant agreed to return the property with vacant possession forthwith and withdraw their RTB immediately.</p>
<p>5.</p>	<p>TENANCY FRAUD/RTB – As part of the fraud prevention programme CAFS review and verify all Right to Buy (RTB) applications, and it was during this process that several discrepancies were identified on an RTB for Ashcroft Square where background checks indicated that the tenant was not resident. Suspicion was heightened following several unsuccessful visits. Eventually, the tenant's sister contacted officers, saying she lived there with the tenant who was away at present.</p> <p>Further to this initial contact, a prearranged visit was undertaken, and investigators were greeted by the tenant who showed them around the property. However, the investigators soon realised there were none of the tenant's belongings at the address, no clothes or any children's toys (the tenant had two children). Officers cautioned the tenant at the property and explained that she would need to attend a formal interview.</p> <p>Before the interview under caution, officers made further enquiries across the East Midlands, and they found a trail which led them further north, linking the tenant linked to a property in Leeds, held in her husband's name.</p> <p>A week before the interview the tenant contacted the Council to withdraw her RTB application and contacted the investigating officer to say she was no longer in need of the Ashcroft Square address and terminated her tenancy forthwith. Vacant possession was accepted without the need for lengthy and costly legal action, ensuring the property could be promptly reallocated.</p>
<p>6.</p>	<p>TENANCY FRAUD – CAFS were alerted to a potential subletting case in Swanscombe House, W11. Allegations suggested the tenant was no longer resident but subletting to a family. The property, a one-bedroom flat, was visited on several occasions, but the tenant was never</p>

	<p>found at home.</p> <p>CAFS investigations identified the tenant to have a partner and children, all living in Erconwald Street, W12. This was verified during an unnotified visit to the address, and the tenant was called to an interview under caution.</p> <p>She initially denied subletting and refused to verify that the Erconwald address was her main and principal home. However, after the interview the tenant called the investigating officer and surrendered his tenancy forthwith, providing the Council with vacant possession.</p>
<p>7.</p>	<p>TENANCY FRAUD – CAFS were contacted by Education Welfare who had received information that the family had removed the children from education to live abroad.</p> <p>CAFS traced the family passports which confirmed the family were living between three countries and sometimes with the tenant's mother in Birmingham. A Notice to Quit was served forthwith, and in December 2017 the Council were awarded outright possession with immediate effect. The two-bedroom property in Crane Court, W12 has now been allocated to a family in genuine need of housing support.</p>
<p>8.</p>	<p>BUSINESS RATES FRAUD (NDR) – CAFS were alerted to a potential fraud when the liable business rates individual refused to pay an outstanding debt.</p> <p>A commercial premise (shop) in Greyhound Road had a debt of £44,756 but was adamant that the liable person was the previous leaseholder of the shop. However, the Business Rates Department were concerned by the documentation provided to support this.</p> <p>Investigators tracked down the person, named in the correspondence as the leaseholder, and she confirmed that she had never met the owner of the premises, and had never been to the premises. Her husband has been an old leaseholder, but that was before the dates concerned.</p> <p>During the period of the investigation, the owner of the premises began to make contributions towards the repayments (£30,000), but the investigation had amassed evidence of intent to defraud the Council by avoiding debt.</p> <p>A summons was issued with three charges under the Forgery and Counterfeiting Act 1981 as well as three charges under the Fraud Act. This led to a pre-trial hearing at Southwark Crown Court where the owner of the premises pleaded guilty to four of the six counts, and therefore a trial was listed to hear counts 5 and 6, set for July 2017, but on the first day, he pleaded guilty to all charges.</p> <p>On 27 July 2017 at Southwark Crown Court, the defendant was sentenced to 18 months' imprisonment, and order to repay the debt in full and costs of £7,368 within 12 months.</p>

<p>9.</p>	<p>PROCEEDS OF CRIME – In October 2016 CAFS investigated and successfully prosecuted a council tenant who was caught renting out her home in White City while living and working in the United Arab Emirates (UAE).</p> <p>During the investigation, officers searched the address but found no evidence of her living there. A warrant for her arrest was granted, and she was found re-entering the UK when she was arrested and two USB sticks seized.</p> <p>Forensic examination found the data stick held tenancy agreements between her and subtenants, and also gave useful leads regarding undeclared finances. This led officers to uncover bank statements which showed credits under the description "rent," as well as incoming payments from Abu Dhabi.</p> <p>Having restrained these assets, the CAFS Financial Investigators served Proceeds of Crime papers upon sentencing where she was handed a 12-month prison sentence, suspended for two years, after admitting to illegal subletting.</p> <p>A confiscation order was awarded for £29,488.46 the amount deemed to be "criminal benefit," and in September 2017 the defendant paid the amount in full rather than face a custodial sentence.</p>
<p>10.</p>	<p>TENANCY FRAUD – CAFS were alerted to a potential fraud when allegations were received regarding subletting activity at a property in Da Palma Court.</p> <p>The investigation found evidence to suggest at least four individuals had been subletting the address from the tenant, who investigators discovered was living in Omagh, Northern Ireland.</p> <p>The tenant was asked to attend an interview under caution, but ahead of the meeting on 31 July 2017 the tenant returned the keys to the Council, and vacant possession was obtained with immediate effect. Following a short void period, the one-bedroom property has now been allocated to someone in genuine need of support and assistance.</p>
<p>11.</p>	<p>TENANCY SUCCESSION – A case was referred to CAFS to verify the succession application for a property in St. Stephens Avenue following the death of the tenant.</p> <p>An application to succeed the property was made by the son of the tenant, who said he had lived with his late father at the address since 1980. However, investigations traced the son to an address in Slough, where he was liable for council tax and registered to vote. Furthermore, financial enquiries established that the vast majority of transactions (i.e., ATM withdrawals) occurred in the Slough area.</p> <p>Visits to the address were unsuccessful, although officers did manage to gain entrance to the communal hallway where they found a large</p>

	<p>number of unopened letters all addressed to the son. He was asked on several occasions to attend an interview at the Town Hall but failed to attend any of the appointments.</p> <p>Finally, the application for succession was declined, and possession of the two-bedroom flat was obtained by the Council, unchallenged.</p>
12.	<p>TENANCY FRAUD – CAFS were alerted to a potential abandonment case via the Anti-Social Behaviour (ASB) Coordinator. ASB's intelligence showed that a one-bedroom flat in Clifton House, W12 had been the subject of a drugs enforcement operation in April 2017. During the search of the residency, three males were arrested, but the tenant was not at the property. He was later arrested at a Westminster address.</p> <p>Following the police action visits to the property were unsuccessful, and there were no signs of anyone returning to the property. CAFS was unable to trace the tenant to the address in Westminster but managed to obtain a mobile number.</p> <p>The tenant was contacted and verbally invited to attend an interview under caution. He stated that he had not lived at Clifton House for over a year but refused to give a forwarding. He refused to attend an interview but verbally agreed to return the keys, and the Council received vacant possession one week later.</p>