

<p style="text-align: center;">London Borough of Hammersmith & Fulham</p> <p style="text-align: center;">AUDIT AND PENSIONS COMMITTEE</p> <p style="text-align: center;">16 December 2019</p>	
<p style="text-align: center;">CORPORATE ANTI-FRAUD SERVICE HALF-YEAR PERFORMANCE REPORT – 1 APRIL 2019 to 30 SEPTEMBER 2019</p>	
<p>Open Report</p>	
<p>Classification - For Decision Key Decision: No</p>	
<p>Consultation</p>	
<p>Wards Affected: All</p>	
<p>Accountable Director: Hitesh Jolapara, Strategic Director of Finance and Governance</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 2019 to 30 September 2019.
- 1.2 CAFS remains a shared service and continues to reap many benefits, including the sharing of skills and expertise, 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 All CAFS work is conducted within the appropriate legislation and through the powers and responsibilities as set out within the financial regulations section of the Council's constitution. CAFS supports the Strategic Director of Finance and Governance (and Section 151 Officer) in fulfilling their statutory obligation under the Local Government Act 1972 to ensure the protection of public funds and to have an effective system of prevention and detection of fraud and corruption.

- 1.5 For the period 1 April 2019 to 30 September 2019, CAFS identified 46 positive outcomes, including 18 recovered tenancies. Fraud identified has a notational value of over £500,000 and is detailed in the following table.

Activity	Half-year 2018/19		Half-year 2019/20	
	Fraud proved	Notional Values (£'s)	Fraud proved	Notional Values (£'s)
Housing Fraud	10	8,650	2	2,000
Right to Buy	12	16,600	4	6,000
Advisory Reports (pro-active)	2	4,500	4	15,000
Prevention subtotal	24	29,750	10	23,000
Tenancy Fraud (Council and Registered Providers)	14	162,700	18	259,900
Internal Staff	1	4,000	3	11,500
High/Medium risk fraud (e.g. NNDR, Procurement, Blue Badge)	1	5,864	5	5,000
Low-risk fraud (e.g. Freedom passes, Council Tax SPD)	2	3,544	5	3,379
Detection subtotal	18	176,108	31	279,779
Fraud loss recoveries <i>[incl. Proceeds of Crime]</i>	3	29,930	5	198,177
Press releases and publicity	1	7,850	-	-
Deterrence subtotal	4	37,780	5	198,177
Total	46	243,638	46	500,956

- 1.6 Between 1 April 2019 to 30 September 2019, CAFS investigated 231 cases, including 99 new referrals, and concluded 92 investigations. A conclusion could mean support of a successful prosecution, successful prevention that stops fraud, a detection that identifies fraud and stops it continuing, an action that deters fraud, or no further action where there is no case to answer.

- 1.7 The table below shows this activity and details the fraud types that make up the closed cases and live cases as at the start of the current financial year.

Activity	Cases	Fraud types	Closed	Live
Live cases as at 01/04/19	120	Tenancy & Housing cases	64	114
New referrals received	99	Internal Staff	3	1
Closed investigations	92	High/Medium risk fraud	15	2
Positive outcomes	46	Low-risk fraud	5	2
Live cases as at 01/10/19	127	POCA	5	8

2. WHISTLEBLOWING

- 2.1 The Council's whistleblowing policy continues to be the primary support route for staff wishing to report a concern.
- 2.2 Since April 2019 CAFS received three referrals via the whistleblowing process. All have been investigated, although two remain on-going. Additionally, an outstanding investigation referred before April 2019 has since been closed.

Allegation	Outcome	Case status
2018/19		
i. Data protection	No fraud found – recommendations made to improve controls	Closed
2019/20		
i. Contractor charges	Investigation remains on-going	Ongoing
ii. Codes of conduct	Investigation remains on-going	Ongoing
iii. Conflict of interest	No fraud found – recommendations made to improve controls	Closed

- 2.3 Where appropriate, cases details are reported in Appendix 1.

3. ANTI-FRAUD AND CORRUPTION STRATEGY

- 3.1 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*.

- 3.2 The strategy places emphasis on 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.

4. ACKNOWLEDGE

Maintain a robust anti-fraud response.

- 4.1 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*)
- 4.2 Responding solely with reactive referrals often fails to provide the levels of coverage required to provide a robust anti-fraud response.
- 4.3 CAFS continue to dedicate resources to pro-active operations which either review the fraud risk of a Council service, and informs the fraud risk register, or counter-fraud drives that detect, deter and disrupt fraud.
- 4.4 Combining pro-active work plans with reactive capability increases the chances of fraud detection but also acts as a robust preventative measure, especially if overt activities disrupt potential fraudsters.
- 4.5 Details of concluded risk reviews and pro-active counter fraud activity are reported in Appendix 1.

5. PREVENT

- 5.1 In addition to the specialist investigative role, CAFS continue to provide advice and support across the organisation, including the Council's partners and contractors.
- 5.2 Advice varies between fraud risk, fraud prevention and detection, money laundering and other criminal activity as well as misconduct and misuse of public funds. Some of the matters may progress to a criminal investigation, but in all cases, appropriate action, including disciplinary or loss recovery, is taken.
- 5.3 This element, along with the 'preventative – deterrent' nature of CAFS work is hard to quantify but where appropriate CAFS will highlight this activity within their reports to this Committee.

Corporate investigations

- 5.4 Corporate investigations are fraud cases which relate to employee fraud or more complex third-party fraud investigations. It also includes activity undertaken by CAFS, which supports the prevention aspect of the Anti-Fraud and Corruption Strategy.
- 5.5 Since 1 April 2019 work in this area has included:

- Report received that an individual previously investigated by CAFS was issuing forged and counterfeit parking permits to residents. A joint operation conducted with Parking services which included a series of vehicle to vehicle checks. No suspect permits were identified.
- A fraud awareness session was provided to contract managers as part of the procurement ethics and conduct work being undertaken. The presentation by CAFS was entitled "fraud in contracts and procurement" and was well-received by attendees.
- Investigations into fraudulently claimed empty property exemptions for business rates (NNDR). Visits to several retail outlets found no evidence to support the allegations.
- Fraud awareness article sent to residents in Banim Street Sheltered Housing following a tenancy fraud. (Further work is being undertaken with the shelter scheme managers, and more awareness sessions are to be scheduled).
- National Anti-Fraud Network (NAFN) alert informed councils that fraudsters were targeting NNDR and Council Tax accounts with stolen credit/debit cards. Appropriate departments were alerted to this emerging fraud risk.
- An eLearning fraud awareness course, designed by CAFS, has been used by Hertfordshire, Thurrock and Castlepoint councils. Depending on the feedback from these pilots, CAFS will be exploring the commercial potential of further courses.

Housing/Tenancy Fraud

- 5.6 CAFS provides an investigative service to all aspects of housing, including the verification applications for housing support, as well as requests 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.
- 5.7 For the period 1 April 2019 to 30 September 2019, CAFS had successfully recovered 18 properties which were being misused, and these have now been allocated or made available to those in genuine need of housing support.
- 5.8 Properties recovered include one four-bedroom and four three-bedrooms which are in high demand by families needing support and assistance. Full details of successful investigation activity regarding social housing are detailed in the table below.

Landlord	Location	Postcode	Size (bedrooms)	Reason for recovery	Outcome
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Council	Crefeld Close	W9	2	Subletting	Property surrendered
Council	Fulham Palace Road	SW6	2	Subletting	Property surrendered
Council	Joanna House	W6	2	Non-residency	Property surrendered
Council	Linacre Court	W6	2	Non-residency	Property surrendered
Council	Michael Stewart House	SW6	1	Subletting	Court possession
Council	Churchward House	W14	1	Abandonment	Court possession
Council	Barclay Close	SW6	2	Succession	Property surrendered
Council	Longford Court	W12	3	Subletting	Property surrendered
Council	Kenneth Younger House	SW6	3	Abandonment	Court possession
Council	Cathnor Rd	W12	2	Subletting	Property surrendered
Council	Hammersmith Grove	W6	1	Subletting	Property surrendered
F/Mosaic	Mellitit St	W12	2	Abandonment	Property surrendered
Council	Arthur Henderson House	SW6	3	Subletting	Property surrendered
Council	Sinclair Road	W14	2	Subletting	Court possession
Council	Bentworth Road	W12	3	Succession	Property surrendered
Council	St Dunstans Road	W6	4	Subletting	Property surrendered
Council	Alex Gossip House	SW6	2	Abandonment	Property surrendered
Council	Banim St	W6	1	False identity	Property surrendered

5.9 Cases of note are detailed in Appendix 1.

5.10 In September, CAFS attended the Housing representatives' forum to discuss tenancy fraud and to seek ideas from tenant association representatives regarding fraud referrals and better engagement.

5.11 The suggestions from tenants will now be taken forward by CAFS, who will work to ensure a broader range of options is made available to residents for reporting suspicions of possible fraud. This includes a revised referral leaflet which CAFS has started to distribute to libraries and community centres across the borough.

Right to Buy (RTB)

5.12 CAFS apply an enhanced fraud prevention process to all new RTB applications, including anti-money laundering questionnaires as well as financial and residential verification.

5.13 For the period 1 April 2019 to 30 September 2019, CAFS has successfully prevented four 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.

5.14 The prevention work undertaken by CAFS in respect of RTB continues to protect valuable Council stock, although there has been a decline in RTB applications 2015/16. The table below shows the steady decline in the number of applications received and the number completed since 2015/16.

Financial year	RTB applications	Sales complete
2015/16	247	80
2016/17	203	56

2017/18	146	30
2018/19	109	19

Schools

5.15 CAFS continue to provide advice and support across the organisation, including the Council's maintained schools. Activity in this area has primarily been focused on preventing fraud and has included;

- Dissemination of a Fraud Alert to Hammersmith & Fulham schools highlighting the risks of potential spam emails that pretend to be from the Headteacher or Chair of Governors. The messages targeted schools during the summer holidays to request immediate payments from school funds.
- For the second year running the Schools, Admission officers were provided access to the fraud tool, AppCheck to assist with the validation of school placement applications as well as offering advice and guidance where anomalies on forms were found.
- CAFS supported completion of the local authority assurance certificate for Dedicated School Grants. It was noted that three cheque frauds had been perpetrated against two LBHF schools. The fake cheques totalled £26,332, but in each instance, the school had followed the correct procedure for issuing and therefore full refunds were obtained from the bank.

National Fraud Initiative (NFI)

5.16 A vital component of the anti-fraud and corruption strategy is making better use of information and technology.

5.17 The Council participates in the National Fraud Initiative (NFI) is an exercise that matches electronic data within and between public and private sector bodies to prevent and detect fraud and error.

5.18 To date over 580 matches have been processed, 67 cases where fraud or error was identified (including correcting Council records), and 85 matches remain under review.

5.19 The tables below highlight the number of reports received from the NFI exercise and the outputs to date.

Report Type	Number of Reports	Fraud & error	Fraud & error value*
Blue Badges	4	55	-
Parking Permits	11		
Council Tax Reduction Scheme	33		
Housing Benefit	19	9	£42,167

Pensions	13		
Housing Tenants	20		
Right to Buy	2		
Waiting List	4	3	£9,720
Personal Budgets	4		
Residential Care Homes	3		
Alcohol Licence	3		
Creditors	11		
Procurement	2		
	129	67	£51,887

*notional values calculated by the Cabinet Office

5.20 The table below highlights successes generated from the NFI exercises to date.

All Positive Results for London borough of Hammersmith & Fulham			
Report No	Data match	Match ID	Comments
232.0	Waiting List to Housing Tenants	3	Waiting list applicant removed from housing register due to already being a social tenant.
172.1	Blue Badge to DWP deceased	-	55 cases where the Blue Badge required cancellation
231 and 241	Waiting list to housing tenants and welfare benefit	1 and 3	An imposter using the identity of a man who used a wheelchair in Northern Ireland was identified. Investigation resulted in him handing over his falsely acquired passport, and the recovery of a Freedom Pass and a Council tenancy.

Case 1, Appendix 1

6. PURSUE

Deterrence

6.1 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)

6.2 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.

6.3 For the period 1 April 2019 to 30 March 2019, CAFS fully recovered £198,177 via POCA. This includes £116,014 in respect of two housing benefit cases that were initially brought to justice in 2016/17.

6.4 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.

Anti-Fraud Activity 1 April 2019 to 30 September 2019

Source	Fraud Review	Details	Risk
Whistleblowing	<p>A whistleblowing referral was made to the CAFS via People and Talent.</p> <p>The referral raised concerns regarding the adopted processes of a service, with specific reference to data protection breaches and the falsifying of statistical records.</p> <p>CAFS was tasked to investigate both allegations.</p>	<p>The investigation revealed the following;</p> <ul style="list-style-type: none"> • An item of controlled stationery was not GDPR compliant, although no reportable data protection breaches had been made. • No evidence was found that statistics had been falsified or intentionally manipulated. <p>The report recommended the following;</p> <ul style="list-style-type: none"> • The item of controlled stationery must be withdrawn, and management tasked to explore alternative methods for capturing this information that is both GDPR and the Data Protection compliant. • The service needs to review the current Key Performance Indicators regarding job brokerage reported to the Corporate dashboard, ensuring it represents output against primary objectives. • The investigation also identified the need for a review of partnerships arrangements to ensure that joint working is equitable for all parties, especially the Council, and support the service's objectives. 	N/A

Anti-Fraud Activity 1 April 2019 to 30 September 2019

Whistleblowing	A referral was received by CAFS, which raised concerns regarding a potential conflict of interest within a department whose activities included significant procurements.	<p>The investigation revealed the following;</p> <ul style="list-style-type: none">• Allegations had previously been brought to the attention of the Head of Service. The potential conflict had been treated, and any associated risks mitigated.• A new potential conflict was identified and reported to management. <p>Recommendations to management</p> <ul style="list-style-type: none">• CAFS recommended that management examine the new information to decide whether a conflict of interest exists.• In examining the new potential conflict, management should also assess any potential risks and take appropriate action to mitigate them. If no direct conflict is found, work should still be considered to ensure they minimise the risk of any perceived conflicts.	N/A
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Anti-Fraud Activity 1 April 2019 to 30 September 2019

Service review	<p>BRACKENBURY PRIMARY SCHOOL: Playscheme revenue</p> <p>An investigation by CAFS found that revenue received for after school activities had not been banked for a significant period. Instead, it had remained held in the school safe. No evidence of fraud was found, but control weaknesses were identified.</p> <p>As part of the investigation, CAFS undertook a service review to check all anti-fraud controls to assess their effectiveness.</p>	<p>The playscheme, Play@Brackenberry, was run by dedicated Play Workers. A child's after school attendance was fee-based, and payments received from parents took the form of cash, cheques and Child Care Vouchers.</p> <p>When the play scheme's manager left the service, unbanked cash receipts were discovered. The discovery highlighted weaknesses in the accounting procedures, although no loss had been incurred and the investigation found no evidence of fraud.</p> <p>Recommendations for improved controls were agreed with the service. During these discussions, considerations were given as to how the service should be provided in the future, and an internal service review was undertaken.</p> <p>This internal review recommended that Family Support Services should be commissioned to provide the service, and this was agreed and implemented.</p> <p>The onsite After School and Holiday Care is now entirely operated by Family Support Services who provide a wide range of activities.</p>	N/A
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Anti-Fraud Activity 1 April 2019 to 30 September 2019

Risk Review	<p>Local Support Payment Scheme</p> <p>The local support scheme is designed to ensure that, in a crisis or an emergency, residents who are most at risk can receive access to the support they need.</p> <p>The local support scheme replaced community care grants and crisis loans for general living expenses. It is administered on our behalf by Kensington and Chelsea Council.</p> <p>Perceived fraud risks included:</p> <ul style="list-style-type: none"> • False applications • Collusion and insider fraud 	<p>Applications for local support payments can only be made for living expenses or for essential items following an emergency or to help people to settle in the community.</p> <p>Payments are made in three different ways;</p> <ol style="list-style-type: none"> 1. Vouchers are provided that can be exchanged for household equipment or furniture, removal expenses or utility connections. 2. Gift cards that can be used in high street supermarkets for food and essential products. 3. In exceptional circumstances, post officer vouchers can be awarded, which can be exchanged for cash. <p>Payments covering 2017 to date were reviewed and analysed to identify any potential discrepancies. This included the amounts paid, method of payment, method of stock control (gift cards) and the clients in receipt of the award. Closer scrutiny was applied to the post officer vouchers, which involved a much higher level of testing, more analytics and data matching.</p> <p>No discrepancies were identified, and controls were found to be reasonable and proportionate to the risk of fraud.</p>	<p>Fraud risk register</p> <p>Risk score reduced</p> <p>↓</p> <p>LOW = 4</p> <p>Impact = Low 2 [Low financial loss, a low political risk with low media coverage; low reputational risk]</p> <p>Likelihood = Unlikely 2 [Controls adequate and review found no discrepancies]</p> <p><i>Previously: Medium impact (3) and Possible likelihood (3)</i></p>
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Anti-Fraud Activity 1 April 2019 to 30 September 2019

	Case Description
1.	<p>IDENTITY FRAUD – A National Fraud Initiative (NFI) data match suggested that the tenant of a Banim Street property held the tenancy for two social housing properties. The one in Banim Street, and a second in Belfast, Northern Ireland. The matched linked them by name, date of birth and national insurance number (NINO).</p> <p>Following liaison with the Northern Ireland Housing Executive, a simultaneous visit was conducted to both addresses. In NI, the tenant was able to provide a post office account statement and a social security letter to verify NINO. In Banim Street investigator found the tenant. His appearance matched the data of birth although officers noted that he spoke with an American accent. He provided investigators with a UK passport as identity and was insistent that this was his true identity. He also told investigators that he had been aware that someone in Belfast was using his identity.</p> <p>Investigators contacted the National Document Fraud Unit asking for the UK passport details to be checked and discovered that this document, the one shown to them in Banim Street, had been revoked. Records showed that the passport had been obtained using fraudulent documentation and following investigations by the Police Service Northern Ireland (PSNI) the passport a stop had been placed on it.</p> <p>Enquiries with PSNI revealed that their NI resident had been named as a suspect in several fraud crimes committed in England. However, when they questioned their resident, it transpired that he had never left NI. When copies of the passport were matched against his identity, it was apparent that he was the victim, having had his identity taken, and not the criminal. PSNI disseminated their findings to Action Fraud.</p> <p>Officers now focused their enquiries on the true identity of the Banim Street tenant and discovered that he had been charged and sentenced for the crimes referred to Action Fraud by PSNI. The frauds consisted of posing as an ex-American serviceman or as an American businessman to befriend victims and steal money and assets. He had served his time for these crimes. Still, the fact remained that he had obtained social housing using false documentation, as well as accessing additional services he may not have been entitled to if his true identity was known.</p> <p>On advice from HM Passport Office, a revocation letter was sent to the tenant, and he was invited to several interviews, all of which he failed to attend. He did, however, contact the investigating officer who explained to him the importance of returning the passport and the consequences of him using it again.</p> <p>In consultation with Housing, a Notice Seeking Possession was issued outlining that he had gained the tenancy by deception by falsely presenting himself to the Council as someone he wasn't, and by using false documentation to conduct the fraud. The tenant did not challenge the notice and returned the keys to the Banim Street property in early September.</p> <p>The passport was returned to the investigator before the tenancy was relinquished. This has since been passed back to HM passport office who were very grateful for the Council's hard work and assistance in this matter.</p>

Anti-Fraud Activity 1 April 2019 to 30 September 2019

2.	<p>CONFLICT OF INTEREST - CAFS received a referral from Human Resources that an employee may have failed to declare secondary employment and the potential conflicts of interest associated with this.</p> <p>A subsequent investigation corroborated the allegations and proved that a Council employee had failed to declare being the Director of a company when completing a declaration of interest form. These enquiries revealed that the employee had also failed to update this declaration when a second company was formed.</p> <p>The investigation report and evidence amassed by CAFS was presented at the subsequent disciplinary proceedings, which resulted in a dismissal.</p>
3.	<p>RIGHT TO BUY (RTB) – CAFS undertake a preventative role in the RTB process vetting all new applications to ensure eligibility. When a new request for a two-bedroom flat in Queen Caroline Street was received, initial checks raised concerns. The application had been made on behalf of the tenant, by his son. In the form, the son was offering to finance most of the purchase.</p> <p>Initial enquiries then revealed the son was linked to a property in Cambridgeshire, and that it was the equity in that property which he was trying to release to support his father's RTB. These enquiries began to suggest that the son lived in Cambridgeshire and was not resident in LBHF.</p> <p>The investigation then established that the tenant had been moved into care, which suggested that this change prompted the son to make the RTB application rather than lose the tenancy.</p> <p>The evidence amassed was sufficient to refuse the RTB, and although the son tried to claim succession in an attempt to keep the tenancy, evidence showed he did not qualify, and a notice to quit was promptly served.</p> <p>The son finally relinquished the tenancy returning the keys to a vacant property which has since been allocated to a family in need of housing support.</p>
4.	<p>ABANDONMENT – A referral was received from the housing officer after several visits a property in Kenneth Younger House were unsuccessful, and the tenant's lack of contact with the housing department suggested they may have vacated the address.</p> <p>The subsequent investigation managed to trace the tenant to a care home out of the borough, placed by family members who failed to alert the Council.</p>

Anti-Fraud Activity 1 April 2019 to 30 September 2019

	<p>The property was therefore swiftly recovered, and the Council obtained vacant possession of the three-bedroom flat.</p>
<p>5.</p>	<p>TENANCY FRAUD – An anonymous tip-off reported via the Council’s fraud hotline (020 8753 1273) suggested that the tenant of a flat on Cathnor Road, W12 was living in Brentford and subletting her H&F address.</p> <p>Several visits to the property revealed the tenant’s brother was subletting the address while our tenant lived and worked in Brentford.</p> <p>The tenant was interviewed under caution, but she refused to accept she had done anything wrong. However, as soon as legal proceedings commenced, she relinquished her tenancy ahead of the first court appearance.</p> <p>A two-bedroom property has now been recovered and allocated to someone in genuine need of assistance.</p>
<p>6.</p>	<p>SUCCESSION FRAUD – Following the death of a tenant in Barclay Close, the next of kin submitted a succession request which included his sister and niece. The application stated that all three had lived with the tenant at the time of their death. Now they all expected to succeed to the three-bedroom property jointly.</p> <p>Initial enquiries suggested the sister and niece lived in the Watford area and so the matter was referred to CAFS to investigate.</p> <p>An early morning visit to the address found the next of kin resident but no signs of the sister or niece. Additionally, when officers asked which school the niece attended the next of kin was unable to provide the school’s name or even describe the uniform once officers began to probe deeper. Intelligence showed the niece attended a private school in Bushey, Hertfordshire.</p> <p>Investigators conducted an evening visit but again neither the sister or the niece was resident.</p> <p>The latest visit prompted a response from the sister, via the charity Shelter, who demanded that both the sister and the niece be included in the succession and become named tenants at the address.</p> <p>The investigators managed to find a link to an address in Watford, and they visited the property. A male answered the door but refused to cooperate with the officers or answer their questions. However, when the investigators returned to the office, they found an email from the sister. In her message, she withdraws her, and her daughter's, application for succession.</p> <p>In view, the above, the Housing and Allocation Team were able to liaise with the next of kin and agree that he be transferred to a more suitably sized one-bedroom accommodation allowing the three-bedroom Barclay Close property to be allocated to a family in genuine need of assistance.</p>

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7.	<p>TENANCY FRAUD – Referral to CAFS suggested that the tenant of a flat in Longford Court, Emlyn Gardens, was living overseas.</p> <p>Initial intelligence was unable to identify an alternative address for the tenant. However, it did suggest that the tenant left the UK to go to Poland two years ago.</p> <p>Because of the intelligence investigators conducted an unnotified visit to the property where they discovered the property being sublet. The subtenant allowed officers to inspect the property where they found a notice board in the kitchen, which was displaying the bank account details of the tenant instructing the subtenant to pay the rent to this account. Contact details were left with the subtenant, and the tenant contacted officers the following day.</p> <p>The tenant said that he was in Poland looking for his wife and children and had left a friend to look after the flat while he was away for a few weeks. However, when the investigator challenged him about the length of time he was away, he became defensive. The officer further explained that the Council would begin legal proceedings to recover the address and pursue any money the tenant may have gained using proceeds of crime act.</p> <p>The following day the subtenant returned the keys to the Council on behalf of the tenant. Vacant possession of the three-bedroom property was obtained.</p>
8.	<p>SUCCESSION FRAUD – Following the death of a tenant in Bentworth Road, the next of kin failed to notify the Council and the property remained vacant unbeknown to the Council.</p> <p>Housing officers were alerted to this and made enquiries with the next of kin. They suggested that after the tenant's death, a family relative continued to live there having resided with the deceased at the time of their death. They were, therefore, claiming succession.</p> <p>Investigators amassed evidence to show that the tenant had lived alone for several years. When the next of kin was confronted with this information, they returned the keys to the three-bedroom property forthwith.</p>